

SUPPLY CHAIN POLICY

This Supply Chain Policy represents the commitment of **TREEMME S.p.A.** Unipersonale to ensuring responsible, ethical, and transparent management of its activities and business relationships throughout the entire supply chain. As a certified member of the Responsible Jewellery Council (RJC) since 2016, Treemme confirms its alignment with the United Nations Guiding Principles on Human Rights, the fundamental Conventions of the International Labour Organization (ILO). It also follows the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

In accordance with this policy, TREEMME undertakes to provide evidence, through independent external verification, that:

- a) it respects human rights in accordance with the Universal Declaration of Human Rights and the Fundamental Labour Rights of the International Labour Organization;
- b) it does not engage in or tolerate bribery or corruption, money laundering, or the financing of terrorism;
- c) it supports transparency in state payments and security forces that operate in a manner compatible with protecting the rights related to the extractive industry;
- d) it does not provide direct or indirect support to illegal armed groups;
- e) it establishes processes through which stakeholders can raise concerns related to the jewellery supply chain.

1. Respect for human rights and prevention of serious abuses

TREEMME S.p.A. Unipersonale commits to not tolerating, benefiting from, or contributing to serious human rights violations. This includes torture, cruel or degrading treatment, forced or child labour, human







rights abuses, war crimes, or genocide. The company will terminate any collaboration with parties involved in such practices, implementing preventive monitoring processes and corrective action plans.

2. Direct or indirect support to non-governmental armed groups

TREEMME rejects any form of direct or indirect support to illegal armed groups or organizations that profit from the trade of gold or other precious materials. Zero tolerance is applied toward making payments to, assisting, or supplying equipment to non-governmental armed groups or their affiliates who illegally:

- control mining sites, transportation routes, gold trading points, and upstream actors in the supply chain and/or
- tax or extort money or gold from mining sites, along transportation routes or trading points, or from intermediaries, export companies, or international traders.

Should the company, during enhanced due diligence, identify a reasonable risk of sourcing from or being linked to a party providing such support to non-governmental armed groups as described above, it will immediately cease all engagement with suppliers upstream in the supply chain.

3. Public or private security forces

TREEMME recognizes that the role of public or private security forces is to ensure the safety of workers, facilities, equipment, and property in accordance with the law, including laws protecting human rights. Treemme will not provide direct or indirect support to public or private security forces that commit abuses as outlined in paragraph 1 or that act unlawfully as described in paragraph 2. Any engagement with upstream suppliers will be immediately terminated in such cases.

4. Active corruption or false declaration on the origin of gold

The company maintains a zero-tolerance policy toward any form of corruption, fraud, or false







declarations concerning the origin of materials. It is strictly prohibited to offer, request, or accept bribes or improper benefits; conceal or misrepresent the origin of gold or other precious metals; or make false declarations regarding taxes, duties, tariffs, and royalties paid to governments for the extraction, trade, handling, transport, or export of precious materials.

5. Prevention of money laundering and terrorist financing

TREEMME adopts internal control measures to identify and prevent the risk of money laundering and terrorist financing in relation to its activities and supply chain. All business partners must ensure equivalent compliance procedures.

6. Reporting mechanisms and continuous improvement

The company promotes transparent communication channels to allow employees, suppliers, and stakeholders to safely and confidentially report any irregularities or concerns. Treemme is committed to periodically reviewing and updating this Policy to ensure the continuous improvement of its ethical and sustainability standards.

TREEMME S.p.A. Unipersonale considers social and environmental responsibility an essential element of its growth and reputation. All suppliers and collaborators are required to adopt behaviors consistent with this Policy and applicable international regulations..

Arezzo, November 2025

TREEMME S.p.A. Unipersonale



