



## ETHICAL PRINCIPLES AND RESPONSIBLE GOLD POLICY 2025

### Introduction and Purpose of the Policy

Treemme S.p.A. Unipersonale, a Member of the Responsible Jewellery Council (RJC) since 2016, operates in the heart of the Arezzo gold district while pursuing the highest ethical, environmental, and social standards. This policy defines the principles guiding all company activities in the responsible management of gold and precious metals, in line with the requirements of the RJC Code of Practices (COP).

TREEMME S.p.A. continues to strengthen its activities (design, production, and trade) by pursuing transparency and reliability, both in its products and in its industrial and social relationships. The company values are based on ensuring the highest levels of quality and functionality of its products, as well as a constant commitment to improvement, offering goods that are safe and not harmful to public health and therefore to the final consumer.

This is made possible only when production processes and administrative/commercial practices respect regulations concerning the environment, health and safety, and the dignity and integrity of employees and collaborators.

### Fundamental Ethical Values And Principles

The company's identity is built on operational mechanisms and management systems ensuring the highest efficiency, transparency, integrity, quality, and respect toward suppliers and customers. Treemme is



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committed to ensuring full compliance with applicable laws, promoting a fair, safe, and inclusive work environment, and ensuring that all activities respect human rights and fundamental freedoms.

### **Commitment To Human Rights And Decent Work**

TREEMME acknowledges and supports the principles set out in the United Nations Universal Declaration of Human Rights, ILO Conventions, and OECD Guidelines. The company ensures that no worker is subjected to discrimination based on ethnicity, political opinion, or religion, nor coercion or inhumane treatment. TREEMME guarantees healthy and safe working conditions, fair wages, freedom of association, and strict protection of minors, applying zero tolerance toward forced or child labor. Treemme actively pursues profitability while respecting customer requirements and sector regulations, upholding free and fair competition, and never engaging in behaviors that could generate corruption of any kind in economic or institutional systems.

### **Environmental Protection And Sustainability**

Treemme adopts a responsible and sustainable approach towards the environment, minimizing the impact of its production processes through the efficient use of resources, emission reduction, and proper waste management. The company is constantly investing in innovative technologies and solutions to reduce energy consumption and improve its environmental performance.



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### **Integrity, Transparency And Anti-Corruption**

The company operates according to principles of integrity and fairness, rejecting all forms of corruption, fraud, or money laundering. Internal controls and due diligence procedures ensure compliance with tax, customs, and commercial regulations. TREEMME promotes a culture of legality and ethics at all organizational levels and throughout the supply chain.

### **Responsible Sourcing Of Gold And Precious Metals**

TREEMME sources exclusively from suppliers who comply with the principles of the Responsible Jewellery Council (RJC) and/or the London Bullion Market Association (LBMA). The company guarantees full traceability of gold and precious metals and ensures they do not originate from conflict-affected areas or illegal activities. Partners are required to adopt responsible sourcing policies, promoting ethical, recycled, and sustainable materials.

### **Relationships With Suppliers, Customers And Local Communities**

The company builds relationships based on trust, fairness, and transparency, carefully safeguarding and protecting its corporate heritage, consisting of both material assets and human knowledge.

Treemme selects qualified suppliers who share its values and cooperates with them to improve social and environmental practices throughout the supply chain, thus contributing to the effective and efficient achievement of company objectives.

The company pays particular attention to communication and interactions with the local community, working with local authorities for better understanding and application of regulatory systems, addressing community needs, and supporting social and economic development.



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These principles are implemented through:

- The adoption of internal procedural systems ensuring compliance with national and international regulations governing employment contracts, human rights, political, religious, and trade-union freedoms; tax and customs obligations; anti-money laundering laws; and prohibitions against seeking undue advantage through corruption of institutional or commercial partners.
- Ongoing communication with external partners to prevent non-conformities, improve internal control processes, promote business practices aligned with TREEMME's principles, and share sector information.
- Voluntary adherence to verification procedures conducted by external institutions regarding internal organization, production chain, and responsible sourcing of precious metals. This is according to guidelines issued by the OECD and other qualified associations promoting responsible sourcing of gold and ethical, social, and environmental practices in the precious metals supply chain. TREEMME SPA sources gold exclusively from RJC- and/or LBMA-certified suppliers.
- Active commitment to promoting a culture of legality and ethical behavior among clients and suppliers, especially concerning the gold supply chain, by encouraging partners to:
  - transform and produce using materials that do not originate from conflict zones, illegal activities, or sources that violate human rights;
  - produce in ways that respect the environment and communities involved in industrial processes;
  - promote the rights and dignity of workers and all persons interacting with the company.



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Within this corporate policy, TREEMME S.p.A. Unipersonale commits to:

- upholding transparency, reliability, and legality;
- selecting commercial and industrial partners who can guarantee respect for human rights and child protection according to UN resolutions and who can ensure that precious metals originate from legitimate sources not involved in financing conflicts, terrorism, or money laundering;
- operating in full compliance with the RJC Code of Practices;
- integrating and promoting ethical, human rights, social, and environmental considerations in daily operations, corporate planning, and decision-making processes.

TREEMME S.p.A. Unipersonale reaffirms its commitment to operating in full compliance with ethical, social, and environmental principles, ensuring that all activities align with Responsible Jewellery Council requirements. This Policy is distributed at all corporate levels and made available to commercial partners and the public as a statement of transparency and responsibility.

Arezzo, November 2025

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