

This document collects the ethical-social principles and values on which the corporate policy of **Quadrifoglio Spa** is based, and is aimed at employees, shareholders, customers, suppliers, external collaborators, business partners, and any other subject who can act in the name and on behalf of **Quadrifoglio Spa**

1. Programmatic Policy

Quadrifoglio Spa, heir to a 40-year history that began in the heart of the goldsmith district of Arezzo, is a company specializing in the production of semi-finished gold products and components for high quality gold and jewelry, sold all over the world to goldsmith laboratories and industries. They appreciate quality and reward the company's reliability and technical competence. We provide our customers with a vast catalog of components for jewelry, many of which have a high technological content; We also produce semi-finished products in gold and silver based on the customer's design, developing them at a technical and prototyping level entirely within the company thanks to the strong know-how we have. **Quadrifoglio spa** stands out, in fact, for its high technological capacity: the company includes a laboratory where the semi-finished products requested by the customer are developed and the technology necessary for their realization is designed.

Quadrifoglio S.p.a. has its registered office in the factory located in Arezzo, Via G. Ferraris n. 236, has a production unit in Castiglion Fiorentino, Via Tevere n. 109, and employs a total of 63 employees.

Respect for the person, legality, worker protection and respect for the environment represent the ethical and social values that have always been part of the company policy of **Quadrifoglio S.p.a.**

For these reasons, with the aim of improving the promotion and respect of these values, since 2016 **Quadrifoglio S.p.a.** has decided to become a Member of the Responsible Jewellery Council (RJC), a non-profit organization with regulatory tasks, established to promote ethically responsible, human rights, social and environmental practices throughout the diamond supply chain, of gold and platinum.

RJC has developed a gold standard for the jewelry supply chain and a credible mechanism for ascertaining responsible business practices through third party verification.

As an RJC Member, **Quadrifoglio S.p.a.** is committed to conducting its business in accordance with the RJC Code of Practices (COP), as well as integrating ethical, human, social and environmental considerations into our daily activities, business planning and decision-making processes.

As a member of the RJC, **Quadrifoglio S.p.a.** is aligned and compliant with OECD guidance Annex 2 and RJC COP certified according to the COP 2019 standard.

To this end, we have formalized our social responsibility policy (available at www.quadrifogliospa.com), we have self-assessed the compliance of our activities with the RJC standard and taken the necessary measures to meet the requirements of the certification standard, and we make available to customers and interested parties all the data useful to substantiate the results that our company has obtained from the application of this standard.

Quadrifoglio S.p.a. carries out periodic checks to ascertain that the principles set out in this policy are effectively implemented and respected. To this end, the RJC Control Committee was set up consisting of three different liaison and control figures in the field of environment and safety, human rights and security.

The RJC Committee meets once a year and the periodic Security meeting has been identified as a meeting point to address these issues.

2. Human Rights Policy and Social Policy

Quadrifoglio S.p.a., in addition to compliance with the reference legislation to which it is subject in all the countries in which it operates, is committed to identifying, mitigating and, where possible, preventing potential violations of human rights linked to its activities. To this end, **Quadrifoglio S.p.a.** declares to:

- undertake to support the protection of human rights and fundamental freedoms according to the principles stated in the Universal Declaration of Human Rights of 1948 and in subsequent international conventions on human rights;
- recognize and respect the principles established by the fundamental conventions of the ILO "International Labor Organization" and in particular the right of association through the free registration of workers in trade unions, the prohibition of forced and child labor through employment relationships exclusively related to Ccnl
- Do not tolerate any form of discrimination in the workplace in terms of hiring, pay, overtime, access to training, promotion, termination of employment or retirement based on race, ethnicity, caste, nationality of origin, religion, different ability, gender, sexual orientation, union membership, political affiliation, marital status, pregnancy, physical appearance, AIDS, or age, or any other applicable basis prohibited by applicable labor and workers' rights legislation;
- undertake not to practice corporal punishment and to prohibit degrading treatment, abuse, coercion and any form of intimidation;
- undertake not to procure material in areas where there are armed conflicts, widespread violence or other risks of harm to human rights.

Quadrifoglio S.p.a. it offers all "suitable for work" individuals equal opportunities without discrimination on the basis of factors unrelated to their ability to carry out their work.

Quadrifoglio S.p.a. is committed to supporting the development of the communities where it operates, with the aim of contributing to the economic and social well-being of the area. The company promotes charitable and solidarity initiatives and provides its contribution and support to projects for the requalification of the heritage of artistic and cultural interest of the community where it operates.

3. Commercial, Anti-Corruption, Anti-Bribery and Anti-Money Laundering Policy

Quadrifoglio S.p.a. undertakes to carry out and conduct its business with the utmost respect for ethical standards, ensuring integrity, transparency and compliance with applicable laws. To this end, the Company declares its commitment to:

- not to practice subordination, corruption and extortion and to contribute to the fight against such crimes and unfair practices;
- not to accept payments, gifts, discounts, advantages or promises and / or other utilities that can even be interpreted as exceeding normal commercial or courtesy practices and that could influence the independence of judgment or induce to ensure any advantage or treatment of favor;
- not to carry out transactions and / or operations that could compromise the principles of fair competition and competition or that could constitute an attempt to influence business or decision-making processes;
- avoid conflicts of interest;

- not tolerate money laundering and the financing of terrorist activities;
- apply adequate due diligence that takes into account the risk associated with the counterpart before starting any business relationship and carefully monitor our supply chain and exercise "Know Your Counterpart" activities;
- make known in full and in detail the characteristics of the precious metals sold and ensure the correspondence of weight, functionality, finish and title of their products, ensuring their compliance and quality through systematic checks with effective and cutting-edge precision tools;
- adopt adequate systems and measures to ensure the integrity and safety of product shipments as well as to prevent theft, damage and replacements;
- respect the rights of consumers, in particular by applying fair business, advertising and marketing practices and by adopting the necessary measures to guarantee the safety and quality of its products;
- respect the principle of confidentiality and protection of personal data based on current legislation.

4. Environmental Policy

Quadrifoglio S.p.a., aware that the commitment to environmental protection and sustainable development represents an important value of business ethics, undertakes to carry out its activities in full respect of the environment and in compliance with current legislation, and to have an effective emergency plan in case of harmful consequences for the environment deriving from its activity.

With this in mind, the company undertakes to eliminate or in any case reduce the use of toxic substances, to dispose of the waste produced responsibly and correctly, to use energy and water efficiently, and in any case to minimize the impact of its activities on the environment.

This special attention to the environment has led **Quadrifoglio S.p.a.** to adopt systems for reducing environmental impact, such as:

- its own system for reducing the fumes emitted;
- an exclusive and efficient water recycling system;
- extensive use of solar panels to reduce energy consumption.

A lot of attention and innovation have earned her the official recognition of Ecoefficient Company: the Tuscany Region, in fact, has assigned **Quadrifoglio S.p.a.** the logo "Toscana Ecoefficiente 2005" in the thematic area "use of materials" for the initiative "Replacement of water systems waste", and in 2008 the award "Toscana Ecoefficiente 2008 "for the initiative aimed" at the recovery and reuse of liquid waste from the copper emptying process in the production of empty goldsmiths".

In addition to full compliance with the legislation on heavy metals, Quadrifoglio guarantees the full safety of its products, also as regards the perforating elements, the production of which in fact takes place starting from Italian alloys.

Furthermore, in order to respect the environment and prevent any environmental damage, **Quadrifoglio S.p.a.** undertakes to adequately and constantly train its employees and to carry out periodic environmental risk assessments (with particular reference to waste, water and emissions).

5. Occupational Health, Safety and Hygiene Policy

Quadrifoglio S.p.a. promotes the appropriate actions necessary to protect the safety and health of its workers and people who come into contact with the company, and to this end undertakes to:

- comply with current legislation on health, safety and hygiene in the workplace;
- train and inform employees;
- prepare and maintain a system for identifying and controlling risks to the health and safety of workers;
- define and implement technical, organizational and managerial interventions in order to prevent - where possible - and / or reduce the risks inherent to the health and safety of workers in the workplace;
- ensure and maintain the safety and well-being of employees, visitors, customers and suppliers.

6. Security Policy

Quadrifoglio S.p.a. undertakes to protect industrial property (such as trademarks, patents, distinctive signs, designs, industrial models, intellectual property, etc.) both its own and others. In this regard, **Quadrifoglio S.p.a.** has prepared specific procedures aimed at protecting against theft, damage or replacement of products within its premises and during shipments.

Quadrifoglio S.p.a. it also informed its employees on the importance and duty of respecting the confidentiality and industrial property of both the company and its business partners.

Quadrifoglio S.p.a. finally undertakes to:

- Respect the mandatory regulations;
- Periodically review this Policy;
- Establish measurable goals of compliance from the RJC code;
- Communicate these objectives to all interested parties;
- Implement all the necessary actions to identify and eliminate potential gaps between the planned policy and the company practices actually carried out.

Arezzo, 04/08/2021

High Management

