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C.F.-P.IVA – Reg.Imp.Ar 01339430512
Cap.Soc.€ 100.000,00 i.v. – R.E.A. Ar 99090

COMPANY POLICY

"Quality, timeliness, precision gained in the several years of experience in the gold sector, flexibility, punctuality and availability of samples made on the Client's needs are the main means to compete in the foreign and Italian market.

The objectives of TOP GOLD Srl are to achieve maximum customer satisfaction by satisfying its expectations and explicit and implicit needs, through the provision of precious, as well as compliance with the needs of internal and external Stakeholders identified in the analysis of the Context.

In order to give maximum transparency to its Stakeholders TOP GOLD srl has decided to implement a quality system in accordance with ISO 9001 in order to ensure the reproducibility of its processes and to identify through risk analysis of business processes any risks or opportunities to be kept under control.

In addition, to ensure compliance with ethical, safety and environmental requirements, TOP GOLD SRL has obtained RJC certification since 2016.

TOP GOLD srl complies with applicable laws and relevant technical standards in its industry, ensuring constant information on updates and timely implementation of the same.

TOP GOLD srl is committed to comply with the RJC Principles and Rules of Procedure by informing our Stakeholders (employees, collaborators, suppliers and Customers) about the principles contained therein by disclosing the same through also sharing this Policy and annual reporting in the website.

TOP GOLD Ltd. has carried out a risk analysis not only for the purposes of 9001 but also aimed at assessing the risks to our business arising from our business associates, analyzing the most sensitive situations and implementing appropriate procedures and controls in respect of human rights, social principles and the environment.

The Company's relations with suppliers and external collaborators, in the pursuit of maximum competitive advantage, are marked by fairness, impartiality and respect for equal opportunities towards all those involved.

TOP GOLD SRL requires its suppliers and external collaborators to comply with the principles and requirements set forth in this RJC Policy and conducts an annual evaluation in accordance with the OECD guidelines.

We do not tolerate any kind of bribery of public officials, or any other party, in any form or manner, in any jurisdiction, even where such activities were in practice permitted, tolerated or not judicially prosecuted.

Company individuals involved in acts of active or passive corruption will be subject to disciplinary sanctions as provided for in the applicable CCNL. In addition, Top God srl is extraneous to any political donations.

Should Top Gold srl deem it appropriate, it may make charitable contributions or sponsorships but only



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in the face of objective evidence of serious and involved entities, as well as appropriate evidence of the use of any amount donated (purchase invoices justifying the amount donated).

Payment of bribes or acceptance of any assets is prohibited.

We will not tolerate money laundering and/or financing of terrorist activities. We are committed to the activities of Know Your Customer and Supplier.

We are committed to full and detailed disclosure of the characteristics of the products we sell.

We pledge to take appropriate measures to ensure integrity and security in product shipments. We commit ourselves to the principles of confidentiality and protection of confidential data.

We will exercise utmost vigilance in our supply chain, specifically for the supply of gold, we use only LBMA-certified gold. We are committed to ensuring measures for product security within the premises and during shipments to prevent theft, damage, or replacement.

We are committed to maintaining the safety and well-being of Employees, Visitors and other relevant Business Partners.

We believe in and are committed to respecting fundamental human rights and the dignity of the individual, according to the Universal Declaration of Human Rights as enshrined in the United Nations. We do not tolerate the use of child labor. We pledge not to use any form of forced, bonded, indentured, or prison labor, and not to restrict the freedom of movement of employees and subordinate workers.

We are committed to ensuring high health and safety standards in our premises and operations, and in addition, the Employer directly holds the role of Occupational Safety Officer.

We pledge not to discriminate on the basis of race, ethnicity, caste, country of origin, religion, disability, gender, sexual orientation, union membership, pregnancy, political affiliation, marital status, physical appearance, age, or other restriction not permitted in the workplace, so that all "Fit to Work" persons are accorded equal opportunity without discrimination on the basis of factors unrelated to their ability to perform the intended task. We pledge not to practice corporal punishment under any circumstances and to prohibit the use of degrading treatment, harassment, abuse, coercion or intimidation in any form. We pledge to establish a procedure for handling disciplinary disputes with respect to conduct that is inappropriate with respect to COP standards.

We undertake to comply with current legislation, with respect to working hours and pay; in the absence of such legal requirements, to adopt the standards prevailing in the industry.

Overtime work is voluntary and is not grounds for discrimination against workers who do not adhere to it.

We are committed to safeguarding the surrounding environment.

Amministratore Unico Serena Tavanti

