

# CODE OF PRACTICES POLICY - COP AND STANDARD CHAIN OF CUSTODY – COC

Progold has integrated its management system with:

- RJC principles and Code of Practices
- RJC Standard Chain of Custody

because it believes in its duty to preserve excellence in productions and in the need to make ethical, social, and environmental choices which govern our main activities. This way of conceiving business has led us to an approach that respects human rights from mining to selling the finished product.

In light of this, we undertake:

- not to uphold and undertake illegal business activities, bribing or corruption, money laundering and/or financing terrorism;
- to ensure our business relationships comply with ethical standards and comply with current legislation in place;
- to oppose activities which may directly or indirectly finance illegal factions for acts of war, terrorism, violence and violations of human rights. Ad we undertake to respect relevant UN resolutions, sanctions and any laws which may implement such resolutions;
- to respect international norms on human rights and national labour legislation, regarding employees and collaborators, as established in the SA8000 policy;
- to safeguard workers' safety and salubrity in the workplace, though fully respecting laws, employee prevention, sharing and training;
- to support the development of the communities we operate in, contributing to the local economic and social wealth;
- to acknowledge and respect the rights of the local communities and the value of their traditions, culture and social wealth;
- to involve our suppliers when purchasing metals from artisan and small scale miners;
- to take part in multi-stakeholder initiatives to promote responsible and legal mining practices;
- to comply with applicable environmental legislation and regulations and other requirements
- underwritten with interested parties to prevent pollution and gradually reduce the environmental impact
- of our activities, as stated in the environmental policy as per ISO14001.

Our management system supports us by ensuring:

- the implementation of the five-step framework of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAs, including the provisions of the supplement on gold;
- material traceability of the metals in our certification scope as per Due Diligence practices;
- a finance management where the transactions are completely transparent and without the risk of financing illegal practices;
- the counterparty compliance in accordance with the principles of the SA8000, RJC CoC, ISO9001 and ISO14001 standards;
- the potential risks are updated identifying preventive actions to reduce possible impacts on Progold's and the Responsible Jewellery Council's reputation even ending relations with suppliers;
- the integrity of materials and safety during transport;
- product compliance;
- a procedure for the grievance that may occur about ethical, social and environmental issues, in accordance with the principles of current applicable data protection legislation
- the respect of applicable legislation, including confidentiality and privacy aspects.

Chief Executive Officer

01/07/2023


