

COMMERCIAL AND SOCIAL ETHICS POLICY RJC

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This Code of Ethics is directed toward all corporate bodies and their members, management, employees, external collaborators and consultants, agents, attorneys and any person who acts in the name of, or on behalf of, Chrysos SpA. In general, it is intended for all those whom Chrysos SpA comes in contact with during the course of doing business.

Chrysos S.p.A Management is committed to carrying out and conducting its business activities with the utmost respect for ethical standards, guaranteeing integrity, transparency and compliance with the current laws in force.

More specifically, it is committed to:

- not participating in bribery;
- · not tolerating money laundering or the financing of terrorist activities;
- developing the "Know Your Counterpart" activity, in compliance with current laws and regulations;
- · making known in full detail the various characteristics of products being sold;
- taking adequate measures to guarantee the proper handling and security of product shipments;
- respecting the principles of confidentiality and the protection of confidential data;
- exercising the utmost vigilance regarding the supply chain, specifically the supply of gold;
- guaranteeing adequate security measures for product inside the facilities during shipments, in order to prevent theft, damage or erroneous shipments;
- maintaining the safety and well-being of all employees, visitors and other relevant business associates.

As a further testament of its commitment to protecting the environment, Chrysos S.p.A Management is certified ISO 14001:2015.

Chrysos S.p.A Management believes in, and is committed to, respecting fundamental human rights and the dignity of each individual, in accordance with the Universal Declaration of Human Rights sanctioned by the United Nations.

To this end, Chrysos S.p.A. is committed to:

- not tolerating the use of child labor;
- not resorting to any form of forced labor and not restricting the freedom of movement of employees and subordinates;
- guaranteeing and improving health and safety standards at the production site and in all activities;
- not discriminating based on race, ethnicity, country of origin, religion, disability, sex, sexual orientation, or age, in order that all persons are granted equal opportunity free of discrimination due to factors unrelated to their ability to perform the job;
- not engaging in corporal punishment under any circumstances and prohibiting the use of degrading treatment, harassment, abuse, coercion or intimidation of any kind;
- outlining a company policy to manage disciplinary disputes with respect to inappropriate behavior in accordance with RJC/COP established provisions;
- complying with current legislation, in terms of working hours and pay, and in the absence of these required laws, to adopting the prevailing rules within the sector;
- promoting local community development nearby where Chrysos S.p.A. operates, thus contributing to the economic and social well-being of the local population.

This ethics policy is reviewed annually and disseminated to all employees by affixation on the notice board.

Date	Issued by Management
11/29/2018	Bernardi Francesco