



COMPANY POLICY ON RESPONSIBILITY AND CHAIN OF CUSTODY OF PRECIOUS METALS

Progold recognizes that the responsible management of precious metals and their traceability along the entire value chain are essential elements for ensuring trust, integrity, and sustainability in the jewelry and industrial sectors.

Through this Policy, the company defines its principles and commitments regarding **operational responsibility, materials control, and chain of custody**, ensuring that the sourcing, processing, and marketing of precious metals take place according to ethical, transparent, and verifiable criteria.

Progold S.p.A. conducts its supply chain due diligence in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, including the risks listed in Annex II.

RESPONSIBILITY ALONG THE SUPPLY CHAIN

Progold is committed to:

- Operating responsibly throughout all stages of the precious metals supply chain, from sourcing to delivery of the finished product.
- Identifying, assessing, and managing risks associated with the origin and movement of materials.
- Preventing any direct or indirect involvement in illicit or unethical activities.

RESPONSIBLE SOURCING

The company is committed to:

- Selecting reliable suppliers aligned with Progold's ethical, social, and environmental principles.
- Requiring responsible and transparent behavior along the supply chain.
- Promoting sourcing practices that protect people, the environment, and the communities involved.

CHAIN OF CUSTODY AND TRACEABILITY

Progold ensures that:

- Precious metals are managed through structured processes that guarantee their identification, segregation, and traceability.
- Information related to materials is accurate, documented, and verifiable.
- Physical and documentary flows are controlled throughout all operational phases.

INTEGRITY OF MATERIALS AND PROCESSES

The company is committed to:

- Managing precious metals in a safe and controlled manner, preventing losses, contamination, or improper use.
- Ensuring consistency between incoming materials, processing activities, and finished products.
- Implementing procedures that guarantee reliability and operational continuity.



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TRANSPARENCY TOWARDS CUSTOMERS AND STAKEHOLDERS

Progold is committed to:

- Providing clear and accurate information regarding the origin, management, and traceability of precious metals.
- Communicating responsibly about the characteristics of its products and processes.
- Maintaining relationships based on trust, fairness, and collaboration.

ROLES, RESPONSIBILITIES AND TRAINING

The company ensures that:

- Roles and responsibilities for the responsible management of materials and the chain of custody are clearly defined.
- Personnel involved are adequately trained and aware of the relevant principles and procedures.
- A culture of responsibility and traceability is promoted at all organizational levels.

MONITORING AND CONTINUOUS IMPROVEMENT

Progold is committed to:

- Monitoring the effectiveness of its precious metals management and traceability processes.
- Conducting internal audits and corrective actions where necessary.
- Continuously improving its practices in response to regulatory, market, and stakeholder expectations.

Chief Executive Officer

13/01/2026



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