

RESPONSIBLE SUPPLY CHAIN POLICY FOR FOPE S.p.A.

1. INTRODUCTION

FOPE S.p.A. (hereinafter also referred to as "FOPE" or the "COMPANY") is a certified member of the Responsible Jewellery Council (RJC).

The RJC is a non-profit standard-setting organisation that plays a crucial role in promoting responsible practices and ethical standards in the jewellery and watchmaking industry, bringing together companies of different sizes and from different sectors (from mining to retail).

By promoting a series of standards (RJC Standards), and through third-party certification, as well as a series of collaborative initiatives, the RJC aims to build trust, transparency and sustainability throughout the entire jewellery and watchmaking supply chain, for the benefit of consumers, communities and the environment.

As a member of the RJC, FOPE undertakes to demonstrate, including through periodic audits by independent third parties, its compliance with the highest ethical, social and environmental standards throughout the entire jewellery supply chain.

FOPE prepares an annual Sustainability Report in line with the most authoritative international standards, such as the *Global Reporting Initiative (GRI)*, and ensures that it is fully accessible to the public by publishing it on its website.

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2. COMMITMENT AND COMMUNICATION

This Policy, subject to approval by Senior Management, confirms FOPE's commitment not only to operating in full compliance with the laws and regulations in force in Italy and in the various countries around the world, but also to fully promoting respect for human rights and to avoiding any action that could contribute to corruption, money laundering, the financing of terrorism, or armed conflicts.

The application of this policy is entrusted to a specially designated Company Manager.

This policy is communicated to company staff, FOPE suppliers and other business partners and made public via the company website.

It should be noted that, as an Italian company, FOPE has long since adopted its own Code of Ethics and the Organisational Model pursuant to Italian Legislative Decree No. 231/2001.

The Code of Ethics sets out the values and principles of conduct promoted by FOPE, which form the basis of this policy.

The Organisational Model pursuant to Italian Legislative Decree No. 231/2001 is a document aimed at the prevention of offences, including within the areas of focus of this policy, through the adoption of specific internal control and supervisory measures. This Policy confirms and/or supplements those measures, where applicable.

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3. GENERAL REQUIREMENTS

3.1 - Respect for Human and Labour Rights

FOPE respects and promotes human rights in accordance with the principles and guidelines contained in the Universal Declaration of Human Rights and the Declaration of the International Labour Organisation (ILO).

FOPE complies with all applicable laws and regulations in the field of business ethics, human rights and labour practices.

In particular, FOPE does not tolerate, nor does it intend in any way to profit through abusive behaviour towards human resources and, in particular, strictly prohibits any behaviour related to:

1. Any form of discrimination
2. Forced and/or compulsory labour
3. Child labour, in any form
4. Violations and abuse of any kind
5. Cruel, inhuman or degrading treatment
6. Torture and war crimes
7. Violations of international humanitarian law
8. Crimes against humanity or genocide.

3.2 - Combating public and private corruption

FOPE does not practise and does not tolerate any form of corruption, bribery or undue inducement to give or promise money or other benefits to public entities.

Similarly, FOPE does not practise or tolerate any form of corruption or incitement to corruption against private individuals.

3.3 - Combating Money Laundering and Terrorist Financing

FOPE operates in compliance with anti-money laundering legislation, in Italy and in other countries around the world, and implements appropriate controls on the management of financial resources. Similarly, FOPE combats the financing of terrorism in any form

through appropriate checks on its commercial counterparties and specific controls on the management of financial resources.

It is FOPE's firm intention to actively contribute to efforts to eliminate money laundering where a risk related to the extraction, trade, handling, transport or export of minerals is identified.

3.4 - Combating support for non-state armed groups

FOPE operates on the principle that any supportive behaviour, in whatever form it is implemented, towards non-state armed groups is to be opposed, in particular for those involved in the control of mineral extraction and trade processes.

3.5. - Reference to the Code of Ethics

With regard to the principles set out above in relation to respect for human and labour rights, combating public and private corruption, combating money laundering and the financing of terrorism, this policy also refers more broadly to the Code of Ethics adopted by FOPE.

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4. OPERATIONAL CONTROLS

4.1 - Extension to the supply chain

FOPE actively communicates this policy to its suppliers.

With specific reference to suppliers, having assessed those with the highest risk, the Company requires them to adhere to the principles set out in this policy, to the principles set out in its Code of Ethics and, where possible, also verifies the supplier's adherence to RJC certification.

4.2 - Selection of suppliers

FOPE purchases gold and diamonds only from suppliers that are certified by the RJC, either directly or indirectly (e.g. through banks).

4.3. - Supply Chain Due Diligence

FOPE takes inspiration from the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* and has begun a process of adopting a structured *due diligence* process that is and/or will be characterised by the following key components:

1. Management Systems: the company procedures adopted and the company roles promote and support responsible sourcing;
2. Risk Identification and Assessment: the risks of the supply chain are identified and assessed;

3. Risk Mitigation: a strategy is defined and implemented to respond to the risks identified;
4. Independent Audit: independent audits are carried out;
5. Reporting: the results of the process are reported annually.

FOPE plans to carry out periodic *due diligence* checks on its supply chain (which, where necessary, may also include checks of invoices and declarations of origin), to ensure compliance with the established requirements.

4.3. - KPCS: Kimberley Process

FOPE is aware of the potential link between the profits made from the extraction and trade of diamonds and the conflicts in the countries of origin, and therefore adheres to the principles of the *Kimberley Process Certification Scheme (KPCS)*, purchasing diamonds only through entities which are certified for this purpose, i.e. from exporters/entities that do not finance civil wars.

FOPE opposes any form of direct or indirect support to non-state (illegal) armed groups. Practices such as, for example, purchasing minerals from armed groups and their affiliates, receiving payments from such groups, or sourcing from groups that illegally control mining sites, transportation routes, or mineral trading points, are strictly prohibited.

If a risk of support for such groups emerges in relation to a supplier, the business relationship will be immediately suspended.

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5. WHISTLEBLOWING

FOPE has established a whistleblowing system (*Grievance Mechanism*) accessible to all parties concerned, both internally and externally, with this Policy, or who may become aware of information relevant to the Company's compliance with this Policy.

The purpose of the system is to enable interested parties to report any concerns about the correct application of this policy or actual violations in the application of this policy.

FOPE undertakes to handle whistleblowing reports in a timely, confidential and traceable manner, always providing appropriate feedback to the whistleblower.

Whistleblowing reports may also be sent anonymously: in this case, however, they will only be taken into consideration if they are precise and detailed, i.e. such that they can be investigated even in the absence of the whistleblower's details. Furthermore, in the case of an anonymous report, it will not be possible to provide feedback to the whistleblower on the outcome of the handling process.

Reports may be sent to the following email address: ethics@fope.com.

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6. TRANSPARENCY, REPORTING AND COMMUNICATION

This policy is made publicly available on the FOPE website in the Sustainability section at: <https://fopegroup.com/wp-content/uploads/>_____

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7. EFFECTIVE DATE

This policy, approved by the Chief Executive Officer (CEO), in its first version (1.0), comes into force on 1 July 2026.
