

Responsible procurement policy

Eurotecniche S.r.l. is a company specialized in the design, production and distribution of products and machinery for the treatment and finishing of surfaces. Since we are aware of the significant adverse effects associated with extraction, trade, management and export of minerals from conflict and high-risk areas and we also recognise that we have a responsibility to respect human rights and not to contribute to conflicts, we undertake to adopt the following policy of responsible procurement of precious metals from areas affected by conflict and high risk according to the dictates of the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas":

- We will not tolerate, help, facilitate or contribute in any way to:
 - any form of torture, cruel, inhuman or degrading treatment,
 - any form of forced or compulsory labour, that is, work or service extorted from a person under threat of punishment and for whom that person has not volunteered;
 - illegal and/or unacceptable forms of child labour;
 - other human rights violations and abuses such as widespread sexual violence;
 - war crimes or other serious violations of international human law, crimes against humanity or genocide.
- We will immediately suspend business relations with upstream suppliers if we identify the reasonable risk that they will source from or be linked to parties involved with the serious violations set out above.
- We do not tolerate any direct or indirect support to non-state armed groups or to public or private security forces illegally controlling mining sites, transport routes and upstream actors in the supply chain; illegally taxing or extorting money or minerals at access points to mining sites, along transport routes or at points where minerals are traded; or illegally taxing or extorting money from intermediaries, export companies or international traders.
- We will immediately resolve the relationship with upstream suppliers for whom the reasonable risk has been identified that they are sourcing from or related to parties directly or indirectly supporting non-state armed groups.
- We believe that the only role that security forces, public or private, should have in mining sites, surrounding areas and along transport routes is to maintain the rule of law, safeguarding human rights and ensuring the safety of workers, equipment and infrastructure, and protect the mining site or transport routes from interference with legitimate mining and trade.
- If we or any Enterprise in our Supply Chain enters into contracts with public or private security forces, we will require them to be recruited in accordance with the Voluntary Principles on Security and Human Rights; in particular, we will support measures for the adoption of selection policies that ensure that individuals or units of security forces known to be responsible for serious human rights violations are not employed.
- We intend to work with central or local authorities, international organisations and civil society organisations to help find workable solutions to improve transparency, proportionality and responsibility for payments made to public or private security forces for security services, and to avoid or minimise exposure of vulnerable groups to the adverse effects associated with the presence of such security forces, public or private, in mining sites.

- In accordance with our company's specific position in the supply chain, we intend to define, adopt to immediately implement a risk management plan with suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces committing abuse or acting illegally as described above, if we identify the existence of such a reasonable risk. In such a case, once mitigation attempts have failed, we intend to suspend or terminate business with upstream suppliers within six months of the adoption of the risk management plan.
- We do not intend to offer, promise, give or ask for bribes to conceal or falsify the origin of minerals or to falsify taxes, charges and charges paid to governments for the extraction, trade, transport or export of minerals.
- We intend to support efforts and implement measures to help uncover and eliminate money laundering or terrorist financing where we identify a reasonable risk related to the precious metal supply and distribution chain.
- We apply appropriate due diligence that takes into account the risk associated with the counterparty before initiating any business relationship, we continuously monitor transitions in order to assess the risk of contributing to conflicts, money laundering or terrorist financing or serious human rights violations, and we implement a strategy to respond to the identified risks.
- We maintain documentation relating to counterparties and precious metal transactions to demonstrate that adequate and consistent due diligence has been applied.
- We define a continuous training program for all personnel involved in the precious metals supply chain.
- The company is one of the founders of the Onlus Elios of Bassano Del Grappa, which aims to develop medical-scientific projects putting in synergy the local excellence of the health sector and the industrial world, through the dual social and entrepreneurial approach, to implement the public health service of the territory, making it more effective and innovative, in compliance with local, national, European and international health policies promoted by the World Health Organization.

Eurotecniche S.r.l. provides the following e-mail address info@eurotecniche.com to enable each employee, actor in the supply chain and stakeholders to express any concerns related to the precious metal supply chain or any other identifying risk.

Mussolente, 10th November 2021

Direction

