

The following document collects principles and social-ethical values in which LIRA srl's company policy imprint itself, it is directed to workers, associates, customers, suppliers, external cooperators, company's partner, and any other stakeholder who might act in name and on behalf of Lira srl.

1. Programmatic Policy

Established in 1946 by Bruno and Rodolfo Fattori, Lampa firm specialized since its origin in precious metal's recovery and refinement. The business prosecuted thanks to Marco Fattori's effort, Rodolfo's son, who brought significant innovations and enriched services offered to customers. In 1996 was opened in Florence, located in the historic center, two steps away from Ponte Vecchio - florentine's artisan goldsmith beating heart – a gold and silver's semi-finished product store, silver's laminates, semiprecious rocks, corals and pearls, gold and silversmith's equipment. In March 2010 the business passed to Marco's daughters who constituted Lira Srl company, historical Lampa's heir. Philosophy which animated the company for over sixty years represent a still position even for the new management. From 2010 we are Banca d'Italia's authorized Gold Professionals Operators for gold trade and from 2017 we are OAM's registered members for buying and selling second hand precious metals. In 2021 we started a new service dedicated for galvanic's companies, to recover precious metals from accessories, metal scraps and galvanizing baths.

Lira Srl is a Responsible Jewellery Council's member. (RJC)

RJC is an organization which sets standards to promote an ethical behavior, human rights and kind practices all along the whole diamonds, gold and platinum jewellery's supply chain.

RJC developed a new jewel's supply chain benchmark and reliable mechanisms to verify responsible commercial practices through third parts audit.

As RJC's member, we commit to manage our business in accordance with RJC's procedure code, we pledge to integrate ethical consideration, about human rights, social and environmental daily operations, business planning activities and decision-making processes.

Respect for person, legality, workers protection and environmental respect depict ethical-social values which since the beginning are part of Lira Srl's company policy.

For such reasons, aiming to improve promotions and respect of these values, since 2021 Lira Srl decided to become Responsible Jewellery Council's Associate member, a profitless and regulatory tasks organization, made up to promote responsible praxis from an ethical, human rights, social and environmental point of view for the whole production chain of diamonds, gold and platinoids.

RJC tuned a standard for the whole goldsmith's production chain, and a reliable operative praxis assessment mechanism through third parts audit.

As RJC's Associate member, LIRA Srl engages to perform in accordance with the RJC's Procedure Code (COP), as well as integrate ethical regard, human rights related, social and environmental during daily operations, business planning and decision-making processes.

AS RJC's member, Lira Srl aligned to perform its own activities in accordance to OECD Guidance Annex 2 and commits to achieve the certification which certifies company's compliance to RJC's COP 2019 standard. To that end, we formalized our RJC's programmatic policy, we self-assessed the accordance among our activities and the RJC's standard then adopted necessary measure to fulfill the certification's standard requirements. And we make available to any customer or stakeholder each useful data to prove results which our company obtained applying this standard.

LIRA Srl performs recurring checks to ascertain which every statement principles its actually and effectively applied and respected. To that end the Board takes charge to make controls regarding environment, safety, human rights and security matters.

2. Social and Human rights Policy

Lira Srl besides respecting the actual reference legislation to which it is subject in whole those country within operates, committed to detect, mitigate and whereas possible prevent, human rights potential violation linked to own activities. For such end Lira Srl declares to:

- engages to sustain fundamental freedoms and human rights protection according to 1948's universal declaration of human rights and into next human rights international conventions;
- recognize and respect fundamental conventions established by ILO "International labor organization" especially granting workers the association right through their open union's registration, minor and forced labor prohibition throughout labor relations headed exclusively by CCNL, prohibiting to discriminate, gender, age, ethnicity, religion, union or political, sexual orientation, language or different ability, and applicable legislation in matter of labor and workers right;
- committing to not practice bodily punishment and prohibit humiliating treatment, abuses, coercion and any other threat form;
- we dedicate to not stock up materials by armed conflict's zones, widespread violence or other human rights lesion, in order to not contribute financing the very conflict.

Lira Srl, engages to sustain those community whereas operates, aiming to contribute the social and economic territory's welfare. The company encourage beneficial and solidarity initiative and gives share and support to artistic and cultural heritage retraining into communities whereas operate.

3. Business Politics, Anti-corruption, Anti-concussion, Anti-money laundering

Lira Srl pledge to perform its activity respecting ethical standards, granting integrity, transparence and compliance to current laws. For such end, the Company declares its commitment to:

- not practice subordination, corruption and concussion to contribute fighting against those crimes and unfair practices;
- not accepting payments, gifts, sales, advantages or promises or other utilities which can be interpreted as excess than normal commercial practices or courtesy that can influence judgment's independence or induce to ensure any advantage or favored treatment.
- not undertake transaction and operation which might compromise loyal competition or constitute an attempt to affect deals or decision-making processes.
- avoid conflicts of interest;
- not tolerate money laundering and terroristic financing activities;
- apply an adequate due diligence which considers the associated counterpart risk before starting any commercial relation and supervise carefully our supply chain exercising "Know Your Counterpart" activity;

- disclose entirely and particularly sold precious metal's features and ensure weight correspondence, functionality, refinement and purity title, granting compliance and quality throughout systematic controls with effective and forefront instruments;
- adopting adequate measure and systems to grant safe and intact shipments to prevent thefts, damages and substitution;
- respect consumers rights, applying business loyal practices, advertising and marketing adopting necessary measures to grant product's safety and quality;
- respecting confidentiality principle and personal data safety according with current laws.

4. Environmental policy

Lira srl operates with precious metals, refining and scraping, into goldsmith and galvanizing bath fields.

The company target is representing a benchmark for every operator in our field including firms, labs, craftsman, goldsmith an gold school.

As company we commit to adhere a Business Management System ISO 14001:2015 conformed, in order to ensure a full correspondence among compliance duties and to grant a relentless improving our environmental print, needful condition to integrate our activities in a broader "sustainable development" picture.

For this purpose, active and specific environmental programs were set, periodically verified and revised to reduce the impact and optimize resource availment. These programs are related to highly significant deemed aspects such as: atmosphere emissions, waters managing, energy, raw materials and refuses.

Constituted company target for the next twelve months:

Containing non-renewable resources (methane) expenditure throughout working cycles optimization.

Personnel awareness improving about environmental frictions linked to performing our activities.

Burning plants improving to optimize incinerate operations, achieving energetic saves and improve environmental print.

Lira srl is heavily committed about pollution preventing, deploys every possible environmental risk reduction form of its activity; induce suitable measures of prevention and protection with monitoring and control systems; its hierarchy adequate respond to events with an appropriate training of its technical and administrative personnel.

Lira srl decided to adheres and become an RJC "Responsible Jewellery Council" member. The RJC's certification is based on Code of Practices (COP) standard.

Sustainability it's always more theme of the moment. There's an increased consumers and institutions awareness about social and environmental sustainability.

The whole staff, managerial and operating, it's called to cooperate actively to improve the Business Environmental Management, relatively to its expertise.

To grant compatibility amid activities and environmental safeguard, Lira srl's commitment do not only involves its own personnel but also suppliers, inasmuch,

thanks to their share is possible to achieve high environmental standards.

Furthermore encourages the widest availability to cooperate, involving and participating with territorial institutions, entity of control and others stakeholders, aiming to arrange to most fit environmental's measure of prevention and protection.

5. Health Policy, Safety and Labor's Hygiene

Lira Srl promotes appropriate necessary actions to regarding worker's safety and protection and all those people who get in touch with the company, for such end commits to:

- Respecting the effective legislation in matter of health, safety and hygiene in work place;
- Training and informing personnel;
- Arranging and maintaining a control and recognition system for worker's safe and health.
- Defining and applying technical, organizational and managerial intervention to prevent - whereas possible - and/or reducing health and safe inherent risks linked to the work place.
- Assuring and maintaining safe and wellness for workers, visitors, customers and suppliers.
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6. Security Policy

Lira Srl commit to safeguard its intellectual property and other's. In this regard, Lira Srl arranged suitable procedures to thief's, damages or substitution product defense inside its room or during shipments.

Lira Srl also informed its personnel about relevance and dutifulness to respecting intellectual property's confidentiality of its own and partner's.

Lira Srl is committed in the end to:

- respecting actual laws;
- periodically reviewing current Policy;
- establishing measurable targets accordingly to RJC' Code;
- communicating those targets to every stakeholders,
- implementing every necessary action to detect and cut out potential gaps among programmatic policy and business practice effectively carried out.

Firenze, 08/09/2021

CEO

