

PROCUREMENT POLICY TENABLE

LUSI SRL, recognising that the extraction, trade, handling and export of precious metals from conflict-affected and high-risk areas may entail risks of significant negative effects and adopting respect for human rights and the desire not to contribute in any way to conflicts, undertakes to adopt, disseminate and raise awareness of this policy among its suppliers. The company undertakes to refrain from any action that contributes to conflict financing and to comply with the relevant United Nations sanctions resolutions or, where applicable, national laws enforcing such resolutions.

The company, as an RJC member, through independent external verification, provides evidence that:

- respects human rights in accordance with the Universal Declaration of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work
- does not engage in or tolerate bribery, corruption, money laundering or terrorist financing;
- supports the transparency of payments
- does not provide direct or indirect support to armed groups
- has put in place a procedure describing the ways in which stakeholders can express concerns
- Implements a management system for risk-based due diligence activities related to responsible supply chains of minerals from conflict-affected and high-risk areas

In the procurement process, the company is committed to the following principles:

1. It is not tolerated:
 - any form of torture or cruel, inhuman or degrading treatment
 - any form of forced or compulsory labour, meaning any work or service demanded by a person under threat of punishment and for which that person has not volunteered
 - Child labour
 - other abuses and serious human rights violations
 - war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide
2. Business relationships with suppliers and customers for whom a reasonable risk of abuse or who may be involved in or related to the aforementioned crimes are not permitted
3. Any direct or indirect support through the purchase of precious metals to armed groups or their affiliates, which:
 - control of mining sites, transport routes, points where precious metals are traded and actors upstream in the supply chain
 - illegally tax or extort money or precious metals from mining sites, during transport or at points of sale
 - illegally tax or extort money or precious metals from intermediaries, exporters and international traders
4. Business relations with suppliers are not permitted, or will be immediately terminated, if a reasonable risk is identified that they may obtain supplies or be in any way linked to non-state armed groups through direct or indirect support
5. It is a commitment not to provide direct or indirect support to public or private security forces that illegally control, tax or extort money from mining sites, along transport routes, at points where precious metals are traded, from intermediaries, exporters and international traders
6. is affirmed that the role of public or private security forces is to ensure the safety of workers, facilities, equipment and property in accordance with the rule of law, including human rights standards
7. It is not permissible to offer, promise or solicit bribes and we strongly oppose soliciting bribes, requiring the concealment or concealment of the origin of gold/silver, or making false

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statements regarding taxes, levies, tariffs and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of the precious metal.

8. No form of money laundering shall be permitted and efforts shall be made to effectively eliminate money laundering arising out of, or in connection with, the mining, trading, transport or export of precious metals.

The company requires its employees, agents, consultants and business partners to comply with this policy, and in order to enforce it, we will implement appropriate disciplinary actions, which may go as far as dismissal or termination of contracts.

This policy is developed with reference to the principles of the OECD Guidelines on Due Diligence for Responsible Supply Chains.

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