

This document gathers the principles and ethical-social values that underpin **Quadrifoglio S.p.a.**'s corporate policy, and is aimed at employees, shareholders, customers, suppliers, external collaborators, business partners, and any other party that may act in the name and on behalf of **Quadrifoglio S.p.a.**

Quadrifoglio S.p.a., heir to a 40-year-long history that began in the heart of Arezzo's goldsmith district, is a company specialised in the production of semi-finished gold and silver components for goldsmiths and jewellers of the highest quality, sold all over the world to goldsmiths and jewellery industries that appreciate the quality and reward the company's reliability and technical expertise. We provide our customers with a vast catalogue of jewellery components, many of which with high technological content; we also produce semi-finished gold and silver products to customer design, developing them at a technical and prototyping level entirely in-house thanks to our strong know-how. In fact, Quadrifoglio stands out for its high technological capacity: the company includes a laboratory where the semi-finished products requested by the customer are developed and the technology necessary for their production is designed.

Quadrifoglio S.p.a. has its registered office in the plant located in Arezzo, Via G. Ferraris n. 236, has a production unit in Castiglion Fiorentino, Via Tevere n. 109, and employs a total of 63 people.

Respect for the individual, legality, worker protection and respect for the environment represent the ethical-social values that have always been part of **Quadrifoglio S.p.a.**'s company policy.

For these reasons, and with the aim of improving the promotion and respect of these values, since 2016 **Quadrifoglio S.p.a.** has decided to become a Member of the Responsible Jewellery Council (RJC), a non-profit organisation with regulatory duties, established to promote responsible ethical, human rights, social and environmental practices throughout the diamond, gold and platinum supply chain.

The RJC has developed a gold jewellery supply chain standard and a credible mechanism for ascertaining responsible business practices through third-party verification.

As an RJC Member, **Quadrifoglio S.p.a.** is committed to conducting its business in accordance with the RJC Code of practices (COP), and to integrating ethical, human rights, social and environmental considerations into our daily operations, business planning and decision-making processes.

As a member of the RJC, **Quadrifoglio S.p.a.** is aligned and compliant with the OECD guidance Annex 2 and certified as an RJC COP under the 2019 COP standard.

To this end, we have formalised our social responsibility policy (available at www.quadrifogliospa.com), we have self-assessed the conformity of our activities to the RJC standard and taken the necessary measures to meet the requirements of the certification standard, and we make available to customers and interested parties all relevant data to substantiate the results that our company has achieved by applying this standard.

Quadrifoglio S.p.a. carries out periodic audits to ensure that the principles set out in this policy are effectively and efficiently implemented and respected. To this end, the RJC Control Committee has been set up, consisting of three different persons in charge of the environment and safety, human rights and security.

The RJC Committee meets once a year and the periodic Security meeting has been identified as the meeting point to address these topics.

1. Quality Policy

Quality is a concept that must be present in every production activity or service that the company pursues, and **Quadrifoglio s.p.a.**'s main objective is to provide a product of the highest quality to meet the needs of its customers.

In order to achieve this, it employs experienced and qualified personnel; for 2 generations **Quadrifoglio s.p.a.** has continued, with faithful commitment, to bring beauty, innovation, functionality and technological excellence to the world of jewellery, fashion and eyewear.

Quadrifoglio s.p.a. is constantly evolving and improving, and this is the result of the excellent work carried out by the entire company staff, who are committed to the idea of excellence.

In order to continue to maintain this high quality standard and with a view to continuous improvement, **Quadrifoglio s.p.a.** has adopted a Quality System capable of ensuring the effectiveness of the entire production process, through the involvement and participation of all the organisation's internal and external resources, which are continuously updated according to their roles.

The constant implementation of the management model adopted allows **Quadrifoglio s.p.a.** to adequately plan the actions to be carried out for the full achievement of the quality objectives set by the company management, as well as, to systematically check the effectiveness and efficiency of the organisation as a whole in relation to these.

Among the objectives to be constantly achieved, always with a view to quality, reliability, competence, effectiveness and efficiency, **Quadrifoglio s.p.a.** is committed to

- Working to continuously improve the reliability and quality of its products
- Work to continuously improve customer satisfaction

- Involving all staff and stakeholders through the dissemination of the Policy, the principles of environmental responsibility and the results expected and obtained from the Integrated Quality, Environment and Safety Management System, maintaining continuous channels of communication with the outside world
- Supporting ethical behaviour in the performance of its activities
- Respect and maintain compliance with current national regulations and legal requirements, avoiding all types of chemical and microbiological contamination
- Train its staff within the organisation to enable it to have resources capable of working autonomously and responsibly.
- Create partnerships aimed both at expanding the range of services offered and at increasing the company's recognition within the economic and social fabric of the territory and beyond.

Management undertakes to make available the economic, human and infrastructural resources necessary to ensure adequate management of the Organisational System.

2. Human Rights and Social Policy

Quadrifoglio S.p.a., in addition to complying with the relevant legislation to which it is subject in all the countries in which it operates, is committed to identifying, mitigating and, where possible, preventing potential human rights violations related to its activities. To this end, **Quadrifoglio S.p.a.** declares to:

- undertake to uphold the protection and protection of human rights and fundamental freedoms in accordance with the principles affirmed in the 1948 Universal Declaration of Human Rights and subsequent international human rights conventions
- Recognise and respect the principles established by the fundamental conventions of the ILO "International Labour Organisation" and, in particular, the right of association through the free registration of workers in trade unions, the prohibition of forced and child labour through labour relations exclusively under the C.c.n.l.
- Not tolerate any form of discrimination in the workplace in terms of recruitment, remuneration, overtime, access to training, promotion, termination of employment or retirement on the basis of race, ethnicity, caste, nationality of origin, religion, different ability, gender, sexual orientation, trade union membership, political affiliation, marital status, pregnancy, physical appearance, AIDS, or age, or any other applicable basis prohibited by current labour and workers' rights legislation;
- undertake not to practise corporal punishment and to prohibit degrading treatment, abuse, coercion and any form of intimidation;
- undertake not to procure material in areas where there are armed conflicts, widespread violence or other risks of human rights violations.

Quadrifoglio S.p.a. offers all individuals who are "fit for work" equal opportunities without discrimination based on factors unrelated to their ability to perform their job.

Quadrifoglio S.p.a. is committed to supporting the development of the communities where it operates, with the aim of contributing to the economic and social well-being of the area. The company promotes charitable and solidarity initiatives and provides its contribution and support to projects for the redevelopment of the artistic and cultural heritage of the communities where it operates.

3. Commercial, Anti-Bribery, Anti-Corruption and Anti-Money Laundering Policy

Quadrifoglio S.p.a. is committed to carrying out and conducting its business with the utmost respect for ethical standards, guaranteeing integrity, transparency and compliance with the laws in force. To this end, the Company declares its commitment to

- not to practise subordination, corruption and bribery and to contribute to the fight against these crimes and unfair practices;
- not accepting payments, gifts, discounts, benefits or promises and/or other utilities that may even be interpreted as exceeding normal business practices or courtesy and that may influence independence of judgement or induce to secure any advantage or favourable treatment
- not carry out transactions and/or operations that could compromise the principles of fair competition and competition or that could constitute an attempt to influence business or decision-making processes;
- avoid conflicts of interest;
- not tolerate money laundering and the financing of terrorist activities;
- apply appropriate due diligence that takes into account the risk associated with the counterparty before entering into any business relationship and carefully monitor our supply chain and engage in Know Your Counterpart activities
- fully and thoroughly disclose the characteristics of the precious metals sold and ensure the weight, functionality, finish and title of its products, guaranteeing their conformity and quality through systematic controls with effective, state-of-the-art precision instruments
- adopt appropriate systems and measures to ensure the integrity and security of product shipments and to prevent theft, damage and substitution;
- respect consumers' rights, in particular by applying fair business, advertising and marketing practices and taking the necessary measures to ensure the safety and quality of its products;
- respect the principle of confidentiality and protection of personal data according to current legislation.

4. Environmental Policy

Quadrifoglio S.p.a., aware that the commitment to environmental protection and sustainable development represents an important value of business ethics, undertakes to carry out its activities in full respect of the environment and in compliance with current legislation, and to have an effective emergency plan in case of harmful consequences for the environment arising from its activities. With this in mind, the company undertakes to eliminate or in any case reduce the use of toxic substances, to responsibly and correctly dispose of the waste produced, to use energy and water efficiently, and in any case to minimise the impact of its activities on the environment.

This special attention to the environment has led **Quadrifoglio S.p.a.** to equip itself with systems to reduce environmental impact, such as

- its own system for reducing fumes emitted;
- an exclusive and efficient water recycling system;
- extensive use of solar panels to reduce energy consumption.

Such attention and innovation have earned Quadrifoglio official recognition as an Eco-efficient Company: in fact, the Region of Tuscany awarded Quadrifoglio the 'Toscana Ecoefficiente 2005' logo in the 'use of materials' thematic area for the 'wastewater plant substitution' initiative, and in 2008 the 'Toscana Ecoefficiente 2008' recognition for the initiative aimed at 'the recovery and reuse of liquid waste from the copper emptying process in the production of hollow goldsmithing'.

In addition to full compliance with heavy metal regulations, Quadrifoglio guarantees the full safety of its products, including the perforants, which are in fact produced from Italian alloys.

Quadrifoglio S.p.a., moreover, with a view to respecting the environment and preventing any environmental damage, is committed to adequately and constantly training its employees and to carrying out periodic environmental risk assessments (with particular reference to waste, water and emissions).

5. Occupational Health, Safety and Hygiene Policy

Quadrifoglio S.p.a. promotes the appropriate actions necessary to protect the safety and health of its workers and people who come into contact with the company, and to this end undertakes to

- comply with current legislation on health, safety and hygiene in the workplace;
- train and inform employees;
- set up and maintain a system to identify and control risks to workers' health and safety;
- define and implement technical, organisational and managerial measures to prevent - where possible - and/or reduce risks to workers' health and safety in the workplace;
- ensure and maintain the safety and well-being of employees, visitors, customers and suppliers.

6. Security Policy

Quadrifoglio S.p.a. is committed to protecting industrial property (such as trademarks, patents, distinctive signs, designs, industrial models, intellectual works, etc.) both its own and others'. In this regard, **Quadrifoglio S.p.a.** has put in place appropriate procedures to protect against theft, damage or substitution of products within its premises and during shipments.

Quadrifoglio S.p.a. has also informed its employees on the importance and duty of respecting the confidentiality and industrial property of both the company and its business partners.

Having said all this, **Quadrifoglio S.p.a.** finally commits itself to:

- Comply with mandatory regulations;
- Periodically review this Policy;
- Establish measurable objectives of compliance with the RJC Code;
- Communicate these objectives to all interested parties;
- Take all necessary actions to identify and eliminate potential gaps between the planned policy and actual business practices.

Arezzo, 02/02/2026

La DIREZIONE

