

This document sets out the ethical and social principles underpinning the corporate policy of **Quadrifoglio S.p.a.** It is addressed to employees, shareholders, customers, suppliers, external collaborators, business partners, and any other party acting on behalf of or in the name of **Quadrifoglio S.p.a.**

Quadrifoglio S.p.a., the inheritor of a 50-year history rooted in the heart of the Arezzo jewellery district, specialises in the production of high-quality gold semi-finished products and components for fine jewellery. Its products are sold worldwide to jewellery workshops and manufacturers that value its quality, reliability, and technical expertise. We offer our customers an extensive catalogue of jewellery components, many of which are highly technologically advanced. We also produce gold and silver semi-finished products to customer designs, handling all technical development and prototyping in-house, supported by our strong in-house know-how. Quadrifoglio stands out for its high technological capability: the company houses a dedicated laboratory where customer-requested semi-finished products are developed and the manufacturing technology required for their production is designed.

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

Respect for the individual, lawfulness, the protection of workers, and environmental stewardship are the ethical and social values that have always formed part of **Quadrifoglio S.p.a.**'s corporate policy.

For these reasons, and with the aim of further promoting and upholding these values, Quadrifoglio S.p.a. became a Member of the Responsible Jewellery Council (RJC) in 2016 — a non-profit standard-setting body established to promote responsible practices in terms of ethics, human rights, social, and environmental matters across the diamond, gold, and platinum-group metals supply chains.

RJC has developed a benchmark standard for the jewellery supply chain and a credible mechanism for verifying responsible operating practices through third-party auditing.

As an RJC Member, **Quadrifoglio S.p.a.** commits to conducting its business in compliance with the RJC Code of Practices (COP) and to integrating ethical considerations relating to human rights, social, and environmental matters into its day-to-day operations, business planning, and decision-making processes.

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

To this end, we have formalised our social responsibility policy (available at www.quadrifogliospa.com), self-assessed the compliance of our activities against the RJC standard, and implemented the measures necessary to meet the certification standard requirements. We make available to customers and other interested parties all data substantiating the results achieved by the company through the application of this standard.

Quadrifoglio S.p.a. conducts periodic reviews to ensure that the principles set out in this policy are effectively implemented and upheld. To this end, an RJC Oversight Committee has been established, comprising three liaison and control roles covering environmental health and safety, human rights, and security.

The RJC Committee meets once a year, and the periodic Safety meeting has been designated as the occasion on which these topics are addressed.

1. Quality Policy

Quality is a concept that must be present in every production and service activity pursued by the company, and the primary objective of **Quadrifoglio S.p.a.** is to deliver a product of the highest quality that meets the needs of its customers. To achieve this, the company relies on skilled and qualified personnel; for two generations, **Quadrifoglio S.p.a.** has committed itself to bringing beauty, innovation, functionality, and technological excellence to the worlds of fine jewellery, fashion, eyewear, and biomedical applications.

Quadrifoglio S.p.a. is in a state of continuous evolution and improvement, the result of the outstanding work carried out by the entire company team, which pursues the ideal of excellence with dedication.

To sustain this high quality standard and to drive continuous improvement, **Quadrifoglio S.p.a.** has implemented a Quality Management System designed to ensure the effectiveness of the entire production process, through the involvement and participation of all internal and external resources of the organisation, all of which are continuously updated in line with their respective roles.

The ongoing refinement of the adopted management model enables **Quadrifoglio S.p.a.** to properly plan the actions required to fully achieve the quality objectives set by senior management and to systematically verify the effectiveness and efficiency of the organisation as a whole against these objectives.

Among the objectives to be pursued on an ongoing basis — always in the spirit of quality, reliability, seriousness, competence, effectiveness, and efficiency — **Quadrifoglio S.p.a.** commits to:

- Continuously improving the reliability and quality of its products
- Continuously improving customer satisfaction
- Engaging all personnel and all interested parties through the dissemination of this Policy, the principles of environmental responsibility, and the results expected and achieved by the Integrated Quality, Environment, and Safety Management System, while maintaining open and ongoing channels of external communication
- Upholding ethical conduct in the conduct of its business activities
- Respecting and maintaining compliance with applicable national legislation and statutory requirements, and avoiding all forms of chemical and microbiological contamination
- Training its personnel in-house so as to maintain a workforce capable of working autonomously and responsibly
- Building partnerships aimed both at expanding the range of services offered and at enhancing the company's recognition within the local and wider economic and social fabric

Senior management commits to making available the financial, human, and infrastructural resources necessary to ensure the adequate management of the Organisational System.

2. Human Rights and Social Policy

In addition to complying with the applicable legislation in every country in which it operates, **Quadrifoglio S.p.a.** is committed to identifying, mitigating, and, where possible, preventing potential human rights violations linked to its activities. To this end, **Quadrifoglio S.p.a.** declares that it will:

- Support the protection and safeguarding of human rights and fundamental freedoms in accordance with the principles enshrined 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 Organization), and in particular the right of association through the free registration of workers in trade unions, and the prohibition of forced and child labour, through employment relationships governed exclusively by the applicable collective bargaining agreement (CCNL);
- Not tolerate any form of discrimination in the workplace in terms of hiring, remuneration, overtime, access to training, promotion, termination of employment, or retirement on the basis of race, ethnicity, caste, national origin, religion, disability, sex, sexual orientation, trade union membership, political affiliation, civil status, pregnancy, physical appearance, HIV/AIDS status, age, or any other ground prohibited by applicable employment and workers' rights legislation;
- Not practise corporal punishment and prohibit degrading treatment, abuse, coercion, or any form of intimidation;
- Not source material from areas affected by armed conflict, widespread violence, or other risks of human rights violations.

Quadrifoglio S.p.a. offers equal opportunities to all individuals who are fit for work, without discrimination on the basis of any factor unrelated to their ability to perform their duties.

Quadrifoglio S.p.a. is committed to supporting the development of the communities in which it operates, with the aim of contributing to the economic and social well-being of the local area. The company promotes charitable and solidarity initiatives and contributes its support to projects for the restoration and enhancement of the artistic and cultural heritage of the community in which it operates.

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

Quadrifoglio S.p.a. commits to conducting its business in full respect of ethical standards, ensuring integrity, transparency, and compliance with applicable laws. To this end, the Company declares its commitment to:

- Not practising undue pressure, corruption, or extortion, and contributing to the fight against such offences and unfair practices;
- Not accepting payments, gifts, discounts, favours, or promises and/or other benefits that could be, or be interpreted as, exceeding normal commercial or courtesy practices and that could influence independent judgment or induce the granting of any advantage or preferential treatment;
- Not entering into transactions and/or operations that could compromise the principles of fair competition, or that could constitute an attempt to influence business dealings or decision-making processes;
- Avoiding conflicts of interest;
- Not tolerating the laundering of illicit funds or the financing of terrorist activities;
- Applying adequate due diligence that takes into account the risk associated with the counterparty before initiating any commercial relationship, and closely monitoring its supply chain by exercising "Know Your Counterparty" procedures;
- Fully and in detail disclosing the characteristics of the precious metals sold, and ensuring that the weight, functionality, finish, and fineness of its products meet specification, guaranteeing compliance and quality through systematic checks using effective and state-of-the-art precision instruments;
- Adopting adequate systems and measures to ensure the integrity and security of product shipments, and to prevent theft, damage, and substitution;
- Respecting consumers' rights, in particular by applying fair corporate, advertising, and marketing practices and adopting the measures necessary to ensure the safety and quality of its products;
- Upholding the principle of confidentiality and the protection of personal data in accordance with applicable legislation.

4. Environmental Policy

Quadrifoglio S.p.a., conscious that a commitment to environmental protection and sustainable development is an important value of business ethics, commits to conducting its activities in full compliance with the environment and applicable regulations, and to maintaining an effective emergency plan in the event of harmful environmental consequences arising from its operations. In this regard, the company commits to eliminating or, where possible, reducing the use of toxic substances, to disposing of waste responsibly and in accordance with regulations, to using energy and water efficiently, and to minimising the overall environmental impact of its activities.

This particular attention to the environment has led **Quadrifoglio S.p.a.** to implement systems for reducing environmental impact, including:

- An in-house system for reducing fume emissions;
- An exclusive and efficient water recycling system;
- Extensive use of solar panels to reduce energy consumption.

This commitment and innovation have earned the company official recognition as an Eco-Efficient Enterprise: the Tuscany Regional Authority awarded Quadrifoglio the "Toscana Ecoefficiente 2005" logo in the thematic area of "material use" for the initiative "Replacement of the wastewater treatment system," and in 2008 the "Toscana Ecoefficiente 2008" recognition for the initiative aimed at "the recovery and reuse of liquid waste from the copper drainage process in the production of hollow jewellery."

In addition to full compliance with heavy metals regulations, Quadrifoglio guarantees the full safety of its products, including its piercing products, which are manufactured using Italian alloys.

Quadrifoglio S.p.a. further commits, in the spirit of environmental protection and the prevention of environmental damage, to adequately and continuously 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 necessary measures to protect the safety and health of its workers and of any persons coming into contact with the company. To this end, it commits to:

- Complying with applicable legislation on health, safety, and hygiene in the workplace;
- Training and informing its employees;
- Establishing and maintaining a system for identifying and controlling risks to workers' health and safety;
- Defining and implementing technical, organisational, and managerial measures to prevent — where possible — and/or reduce risks to workers' health and safety in the workplace;
- Ensuring and maintaining the safety and well-being of employees, visitors, customers, and suppliers.

6. Security Policy

Quadrifoglio S.p.a. commits to protecting industrial property (including trademarks, patents, distinctive signs, designs, industrial models, works of ingenuity, and the like), whether its own or that of third parties. In this regard, **Quadrifoglio S.p.a.** has established specific procedures to protect against the theft, damage, or substitution of products within its premises and during shipments.

Quadrifoglio S.p.a. has also informed its employees of the importance and obligation to respect the confidentiality and industrial property of both the company and its commercial partners.

In light of all the foregoing, **Quadrifoglio S.p.a.** further commits to:

- Complying with mandatory regulations;
- Periodically reviewing this Policy;
- Establishing measurable objectives for compliance with the RJC Code;
- Communicating such objectives to all interested parties;
- Implementing all necessary actions to identify and eliminate potential gaps between the planned policy and the business practices actually carried out.

Arezzo, 02/02/2026

The management

