



SUSTAINABILITY

# Responsible Gold Policy Statement

FILK SPA

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As a socially responsible company, Filk S.p.A. concerns for the well-being of people and communities. We conduct business fairly and ethically, respect human rights, comply with laws and regulations and follow a Code of Conduct.

Filk S.p.A. supports the efforts of human rights organizations to end violence and atrocities in Central Africa (the Democratic Republic of Congo(DRC) and nine adjoining countries: Republic of Congo, Central Africa Republic, South Sudan, Zambia, Angola, Tanzania, Burundi, Rwanda and Uguanda).

It has been widely reported that the major driver of this violence is the natural abundance of the minerals tin, tungsten, tantalum and gold, now referred to as “conflict minerals”. Armed groups fight for control of mines in this regions and use forced labor to mine and sell the minerals, which in turn funds ongoing violence.



On August 22, 2012 the U.S. Securities and Exchange Commission(SEC) issued the final conflict minerals rule under Section 1502 the Dodd-Frank Wall Street Reform and Consumer Protection Act(Conflict Minerals Rule).The Conflict Minerals Rule requires publicly traded companies to report annually the presence of conflict mineral (tin,tungsten,tantalum and gold or “3TG”) originating in the Democratic Republic of the Congo or adjoining countries (“Covered Countries”).

## We are committed to comply with any requirements applicable to our Company under the Conflict Minerals Rule.

- Refuse to condone any activities which directly or indirectly finance or benefit armed conflict and violence and that contribute to human rights abuses including child labor.
- Committed to only source gold mined from operations in conformance with internationally accepted environmental practices.
- Refuse to source gold and gold bearing material that originates from area and operations contributing to conflicts financing or to degradation of the environment.
- Do not condone or encourage the direct or indirect support of armed militia groups who may benefit from extraction, transport, trade, logistic assistance, handling or export of gold and gold bearing materials.
- Refuse to deal with counterparties that do not confirm with local and international laws
- Ensure the standards across the entire chain of custody by meeting the requirements set by the following guidelines, directives and laws:
  - The World Gold Council-Conflict Free Gold Standard
  - The LBMA- Responsible Gold Guidance
  - The OECD- Guidance of Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas and Supplement on Gold
  - The SEC-Dodd-Frank Act Section 1502

- Require all of our suppliers to provide us with completed conflict minerals declaration.
- May reconsider our willingness to work with suppliers that fail to comply with this Policy.
- Strive to work cooperatively with our customers and supply chain partners in implementing conflict minerals program.

We are developing an ongoing precious metals supply chain training program for all staff involved in the precious metals supply chain and maintain adequate records of the supply chain documentation to demonstrate that appropriate and ongoing due diligence have been followed.



FILK S.P.A.

CEO

Andrea Cremasco