

Azienda	Codice	Descrizione	Rev.	Pagina
 LEM S.R.L. Socio Unico		POLITICA Approvvigionamento Responsabile Oro	00	1 di 1

POLICY for Gold Responsible Procurement (Policy “Responsible Gold”)

Lem Srl Socio Unico realizes that negative and dangerous effects derive from extracting and exporting minerals from conflict-affected and high-risk regions; Lem also realizes that to respect human rights and not to foster conflicts is very important; thus Lem commits to write and adopt the following policy for gold responsible procurement:

- not tolerate or contribute to inhuman treatments, forms of forced labour, child labour, human rights and international law violations (as already expressed in social policy SA8000 adopted by Lem);
- to avoid any form of trading relationship with companies which may foster or be involved in above expressed violations;
- not to support directly or indirectly private security forces which control in a illegal way mine sites or supply chain points or export companies by extorting money;
- to contribute to find out forms of money laundering and terrorism financing and to avoid to support them;
- to perform a suitable due-diligence that considers the actual risk to contribute to conflicts, money laundering and terrorism financing of any potential trading relationship;
- to procure and buy only from companies resulting members of associations such as LBMA or RJC after duly checking their certification;
- to define continuous training program in order to train all personnel involved in the gold supply chain.

10th December 2015

La Direzione

Daniele Guldani



S.r.l. Socio Unico
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