

VPM VICENZA
PRECIOUS
METALS



Developed in accordance with UN PRINCIPLES AGENDA 2030, GRI INDICES

B.Sos.rev.00_2022



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1. GENERAL CONSIDERATION

1.1 DESCRIPTION

The Sustainability Report and Review is a public information document on the social and environmental effects of the activities of VICENZA PRECIOUS METALS SRL and provides a report on the actions taken and future initiatives of the company, has an annual drafting frequency and reports the values, situation and objectives of VICENZA PRECIOUS METALS SRL in the field of social and ethical relations.

The document is prepared by the Management, in collaboration with the other members of the Sustainability Team, in accordance with the requirements of the UN 2030 agenda and the Global Reporting Initiative (GRI) indicators used as guidelines to address these issues in a systematic manner.

The document includes both the Corporate Sustainability Policy and the Management Review, aimed at defining, verifying, correcting and improving the company's commitment to sustainability.

The Sustainability Report and Review, in fact, has a double value:

- is a management tool for management as it measures its Social Responsibility and Sustainability Policy and other policies and procedures adopted to achieve corporate sustainability and to improve it over time ,
- is a means of communication because it informs and collects information from stakeholders who, in this way, participate in the company's conduct. This document is made available to all company personnel via the intranet and to all external stakeholders via the website <https://www.vicenzapreciousmetals.com/>

1.2 RECIPIENTS

The Sustainability Report and Review is addressed to those who have significant relationships with VICENZA PRECIOUS METALS SRL and in particular to:

- ✓ COMPANY PERSONNEL;
- ✓ COLLABORATORS;
- ✓ CUSTOMERS;
- ✓ BUSINESS PARTNERS;
- ✓ LOCAL COMMUNITY;
- ✓ SUPPLIERS;
- ✓ SUBCONTRACTORS;
- ✓ TRADE UNIONS.



The company asks these subjects a direct or indirect participation in this common commitment to protect the environment and the protection of fundamental human rights.

1.3 OBJECTIVES

The objective of the Sustainability Report and Review is to provide an account of the initiatives developed by VICENZA PRECIOUS METALS SRL and communicate, in a clear and transparent way to all stakeholders, achievements in social responsibility and sustainability.



More specifically, the Sustainability Report and Review aims to:

- 01 Evaluate ethical values, social commitments, principles and reference rules, with a view to continuous improvement.
- 02 Provide information on the social effects arising from societal choices.
- 03 Foster dialogue, involvement and consent of interested parties.
- 04 Fully realize the Sustainability System (also through certification)



1.4 REGULATORY ELEMENTS

The organization must comply with local, national and other applicable laws, prevailing industry rules, other requirements to which the organization adheres, as well as this Standard. Where such laws, rules or other requirements to which the organisation adheres and the Standard relate to the same subject, the provision which is most favourable to workers must be applied. The organisation shall also respect the principles of the following international instruments:

- RJC COP 2019 and RJC COC 2017 standards
- T.U. 81/2008 Health and Safety of workers
- European Privacy Regulation 679/2016
- CCNL for goldsmith sector workers
- Statute of workers law 300/1970
- Dignity Decree (Legislative Decree 87/2018)
- Law 68/99 recruitment of protected categories
- Legislative Decree 66/2003 Organization of working hours
- Guidelines for the construction of organizational and control models Legislative Decree 231
- Legislative Decree 152/2006
- ILO Convention 1 (Duration of Work - Industry) and Recommendation 116 (Reduction of working hours)
- ILO Conventions 29 (Forced labour) and 105 (Abolition of forced labour)
- ILO Convention 87 (Freedom of association and protection of the right to organize)
- ILO Convention 98 (Right to organize and collective bargaining)
- ILO Conventions 100 (Equal pay) and 111 (Discrimination in employment and profession)
- ILO Convention 102 (Social Security - minimum standards)
- ILO Convention 131 (Definition of the minimum wage)
- ILO Convention 135 (Workers' Representatives)
- ILO Convention 138 and Recommendation 146 (Minimum age)
- ILO Convention 155 and Recommendation 164 (Safety and Health at Work)
- ILO Convention 159 (Professional and occupational reintegration - disabled people)
- ILO Convention 169 (Indigenous and Tribal Peoples)
- ILO Convention 177 (Home working)
- ILO Convention 181 (Private Employment Agencies)
- ILO Convention 182 (Worst forms of child labour)
- ILO Convention 183 (Protection of Maternity)
- ILO Code of Conduct on HIV/AIDS and the world of work
- Universal Declaration of Human Rights
- International Covenant on Economic, Social and Cultural Rights
- International Covenant on Civil and Political Rights
- United Nations Convention on the Rights of the Child
- United Nations Convention on the Elimination of All Forms of Discrimination Against Women
- United Nations Convention on the Elimination of All Forms of Racial Discrimination
- United Nations Guiding Principles on Business and Human Rights
- OECD Guidelines for multinational companies
- Uni / Pdr 125:2022 on Gender equality
- Official Journal 176 of 07/29/2022 Transparency Decree
- ISO 30415 – Diversity & Inclusion
- Transparency Decree Legislative Decree 104 of 06/27/2022

2. PROFILE OF VICENZA PRECIOUS METALS SRL

VICENZA PRECIOUS METALS SRL is a company with headquarter in Vicenza specialized in precious metals trading.

In particular, Vicenza Precious Metals srl deals with the trade of ingots and bars in gold, silver and pgm.

The company complies with all the mandatory regulations of the sector , in addition to the national regulations relating to the health and safety system (T.U. 81/2008), to the European Privacy Regulation (679/2016), to the regulations relating to the use of chemicals (Reach Regulation 1907/2016), to the application of the T.U. Environmental 152/2016 and all the regulations relating to Labour Law.



THE MARKET

The market in which the company operates is both local, national and international.

THE COMPETITION

The competition consists of other companies in the area capable of providing the trading service .

PROVIDERS

The suppliers of Vicenza Precious Metals are companies subject to a careful qualification from the point of view of sustainability. Suppliers adhere to the sustainability principles set out in the RJC Sustainability Policy . .

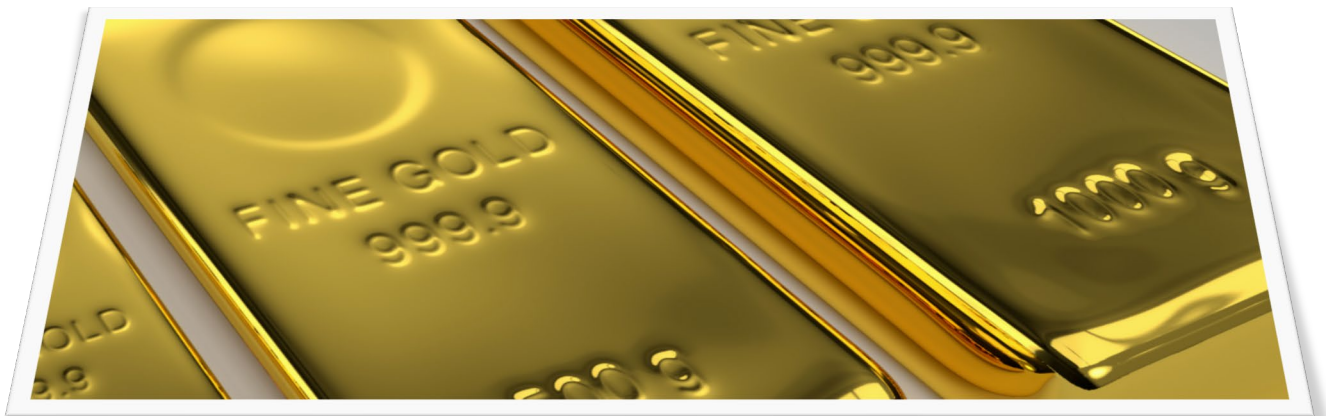
THE EMPLOYEES

The employees of VICENZA PRECIOUS METALS SRL are mainly dedicated to sales and order management. All personnel are trained for the role they play or monitored to do so. The goal is to always have competent personnel in the role they are called to play. The objective of the company is to have and to give confidence

to the employee in the role that covers and in the importance that everyone has in the success of the company.

THE COMPANY HEADQUARTERS

The corporate headquarters of Vicenza Precious Metals srl is located in the goldsmith district of Vicenza and is a commercial site equipped with all the necessary security required by the sector.



RELIABILITY

VICENZA PRECIOUS METALS SRL is a trusted partner for both its suppliers and its customers. Customers want a precious metal delivery service and suppliers want the metals to be sold on the market. VPM unites customer and supplier trying to fully recognize the needs to satisfy them in the best way.

TEAM

The work team was born from everyone's commitment to customer satisfaction.

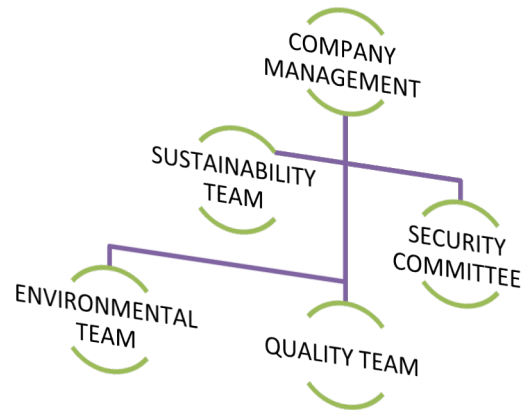
The essence of success is working for the common good, because the company is a community of people who work together to achieve the well-being of all.

Thus VICENZA PRECIOUS METALS SRL introduces itself as a group of people united by a single thought linked to sustainability and social responsibility .

2.2 ORGANISATIONAL

STRUCTURE AND RESPONSIBILITY

The company management system includes teams and committees with the task of monitoring business processes, promoting the improvement of sustainability, acting promptly in case of need, supporting and stimulating the organization in the application of ethical principles.



2.3 TEAM

The sustainability team is made up of management representatives and employee representatives.

team is made

The main responsibilities regarding the Sustainability System are summarized below:

The sustainability team consists of management representatives and employee representatives. The main responsibilities regarding the sustainability system are summarized below:

RESPONSIBLE for the sustainability system

- Has responsibility for compliance with sustainability standards and principles
- Defines and approves the Company Policy
- Oversees the management review in order to verify the adequacy and effectiveness of the System Policy to define the improvement actions to be implemented
- Approves the Report and Sustainability Review
- Is responsible for the implementation and monitoring of the Sustainability System with the collaboration of the other members of the sustainability team
- Prepares the Sustainability Report and Review with the collaboration of the other members of the sustainability team and any interested parties.



SUSTAINABILITY TEAM

- Collaborates with Senior Management for the correct application of the Sustainability System
- Facilitates communication between workers and Management as it includes their representatives who therefore play the role of direct spokesperson
- Identify and assess risks by prioritizing areas with the greatest potential for non-compliance with the Sustainability Standard
- Performs activity monitoring activities in the workplace to keep tabs on:
 - a) compliance with ethical and sustainability standards and codes
 - b) the implementation of actions planned to address the risks identified by the sustainability team
 - c) the effectiveness of the methods adopted to meet the organization's policies and the requirements of the standard
- Participates in the preparation of the Sustainability Report and Review
- Ensures the application of the actions implemented for the resolution of non-conformities and the implementation of corrective and preventive actions
- Participate in the development of the training plan
- Responsible for relations with the certification body
- Responsible for relations with interested parties.



2.4 ETHICAL BUSINESS POLICY

VICENZA PRECIOUS METALS SRL has therefore decided to develop and apply a Sustainability System consistent with the principles of the 2030 UN Agenda, the RJC COC and COP standards and the GRI indicators.

The company undertakes to this end to join and comply:

- to all requirements of RJC COC and COP standards
- the Conventions of the International Labor Organization (ILO)
- to the United Nations Convention on the Rights of the Child
- to the Universal Declaration of Human Rights
- to the United Nations Convention on the elimination of All Forms of Discrimination against Women and All Forms of Racial Discrimination
- to the International Covenant on Civil and Political Rights and on Economic, Social and Cultural Rights.
- all national and international laws on the subject, including Legislative Decree 81/2008 and subsequent amendments, relating to health and safety in the workplace and Regulation 679/2016 relating to the confidentiality and processing of personal data.
- to the OECD Guidelines
- to Legislative Decree 152/2006 Single Environmental Text

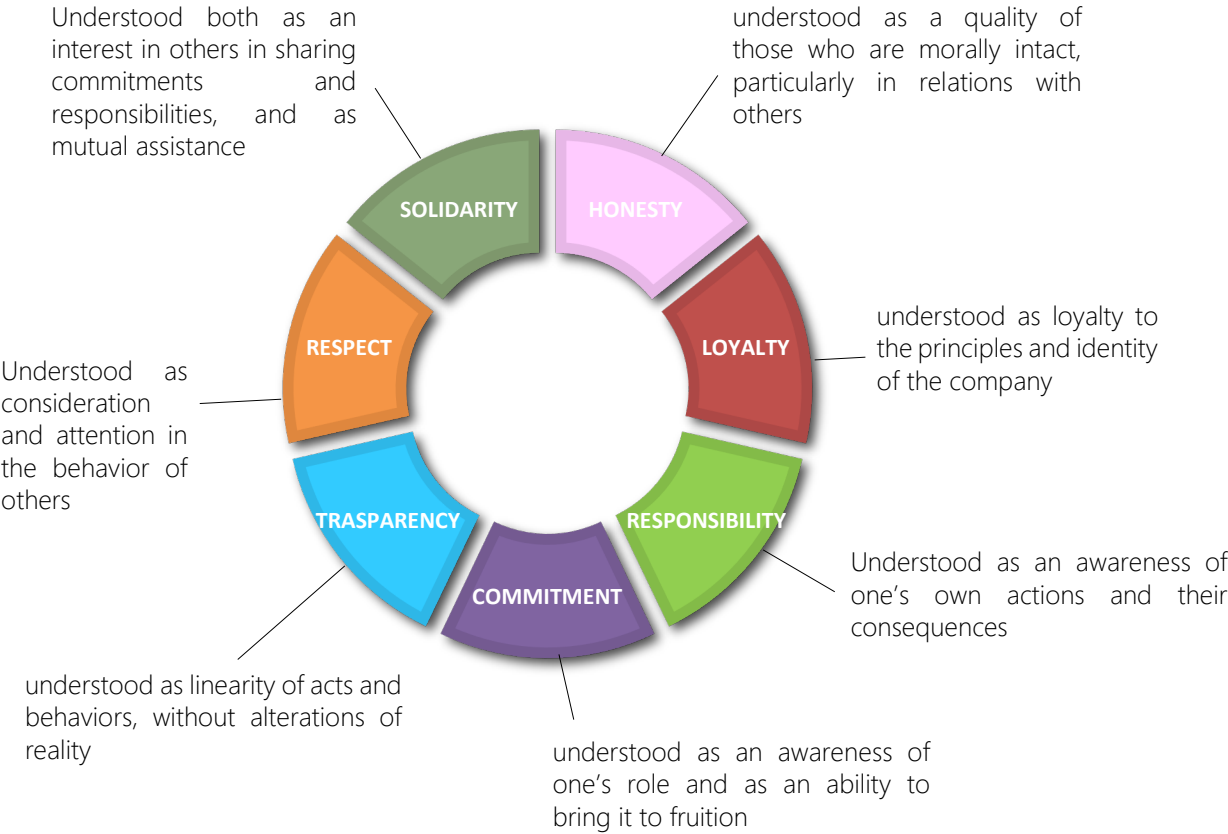
The general objectives that the company intends to achieve and maintain are:

- | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> • Prevention of situations affecting the rights of the person • Increasing the efficiency of your organizational structure and supply chain • Spreading a culture of social responsibility through a continuous process of training, involvement and empowerment of staff • Rationalisation of structure and procedures with clear and balanced definition of tasks and responsibilities • Creating a stimulating and rewarding business climate for staff growth • Participation and contribution to solidarity / social initiatives • Commitment to spreading sustainability principles to all stakeholders • Participation in the development of a circular economy | <ul style="list-style-type: none"> • The company undertakes to comply with the principles established by the Sustainability System and, in carrying out its activities, requires its employees / collaborators / suppliers to comply with the regulatory requirements regarding : <ul style="list-style-type: none"> • Infant and child labour • Voluntary employment • Health & Safety • Freedom of association and right to collective bargaining • Discrimination • Disciplinary practices • Working time • Remuneration • Respect and attention to the environment • Anti-corruption • Legality / fight against fraud |
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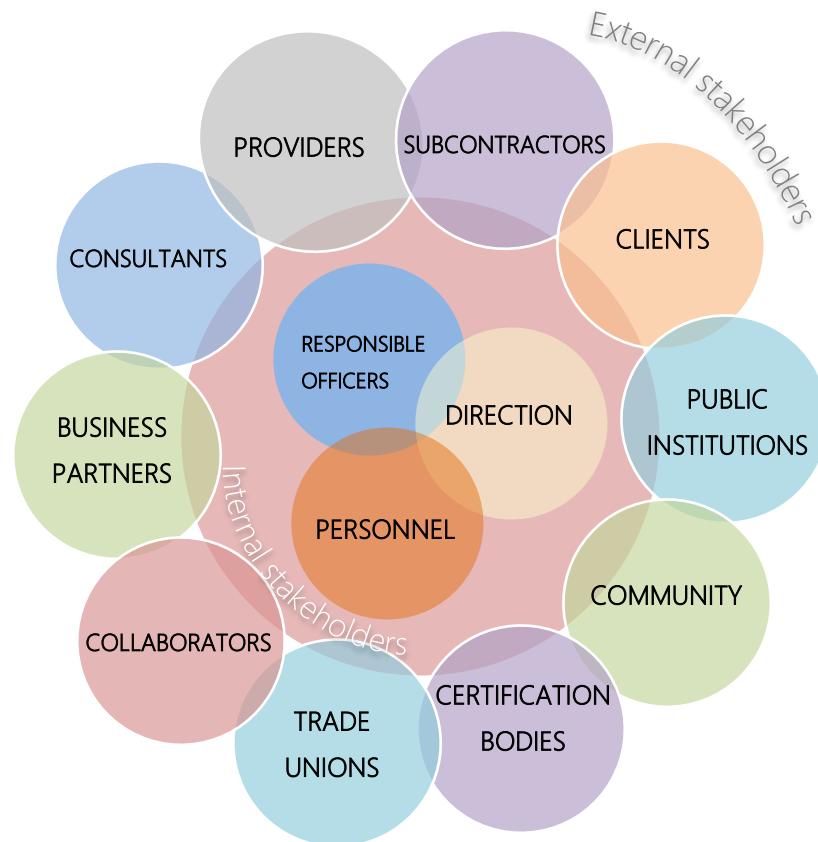
2.5 VALUES

VICENZA PRECIOUS METALS SRL, therefore, recognizes as fundamental the human values primarily represented by:



3. STAKEHOLDERS

The stakeholders identified in the social responsibility system of VICENZA PRECIOUS METALS SRL can be divided into two different groups: internal and external stakeholders.



Each group has a different set of expectations, needs, wants and interests towards the company.

In general:

With regard to internal stakeholders, sustainability is manifested and affirmed in ensuring compliance with the rules, mutual involvement and trust, in a business climate suitable to promote the greatest possible protection of employees and collaborators, in the desire to foster the growth of each person's skills, generating satisfaction for their needs and aspirations.

Compared to external stakeholders, sustainability is expressed in a variety of ways and in relation to the roles that each of them assumes and that can be synthesized in the awareness of interacting with a company whose attention to sustainability is manifest, certified by independent bodies and made explicit also through this management review.

In particular:

COMPANY MANAGEMENT

The ethical need is to produce profit and business growth without compromising its sustainability, through the lack of respect for the rights of the resources employed (human and environmental), as well as producing and creating benefit from the spread of ethical principles that support it.

Method of satisfaction

Seek to increase profits through the identification of a business increasingly attentive to sustainability, generating the benefits of internal and external satisfaction needed to achieve the goals of economic nature and personal and team gratification.

RESPONSIBLE OFFICERS

The need is not only to have a positive economic response but to participate in projects to protect and safeguard people and our planet .

Method of satisfaction

Adhering to projects for the continuous improvement of corporate sustainability, reporting the results objectively and identifying possible developments and opportunities for growth from year to year.

BUSINESS PARTNERS

The need of business partners (e.g. subcontractors) is to share the principles of sustainability to spread trust in stakeholders and a team spirit in facing the challenges of our age.

Method of satisfaction

Adhere to a common sustainability policy; define common objectives and strategies in safeguarding the environment and in the correct management of human resources.

STAFF AND COLLABORATORS

The ethical requirement is to satisfy one's needs, economic and for personal fulfillment, based on one's attitudes, beliefs, needs and aspirations in an environment that guarantees respect for the health and safety of workers.

Method of satisfaction

Implement a management system that respects the inspiring ethical principles, verifying the satisfaction of the socio-economic, health and safety needs of the personnel employed, in relation to their attitudes and aspirations, continuously improving the effectiveness of the methods defined to achieve the ethical objectives set.

PROVIDERS

The ethical requirement is to establish a fruitful collaboration in economic terms and business growth, without compromising one's own sustainability, through the failure to respect the rights of the resources used (human and environmental).

Method of satisfaction

Establish clear collaboration relationships and create a partnership in the activity aimed at respecting the

rights of its workers and collaborate on jointly identified improvement actions. Sustainability is achieved through teamwork: therefore the ethical and environmental principles are shared with all the players in the supply chain.

CUSTOMERS

The ethical requirement is to see one's needs satisfied in relation to the product and service purchased without, with this, compromising respect for the rights of the resources used to create it and the environment in which we live; do not harm one's image by engaging in behaviors that are not ethically responsible towards the community.

Method of satisfaction

Satisfying customers' needs by creating long-lasting partnerships, defining a communication channel with them that allows them to receive reports, suggestions and complaints. Monitor the sustainability of customers by promoting the principles of sustainability and stimulating their adherence.

COMMUNITY

An ethical requirement is to see satisfied one's will to protect and, if possible, improve the well-being and image of the community, understood as businesses and citizens.

Method of satisfaction

Over time, build a sustainable business model that can contribute to the satisfaction of the image needs of the community in which we grow up and concretely inspire all the subjects who are part of it (businesses and citizens); spreading wealth in the area by creating jobs.

TRADE UNION

An ethical requirement is to see the principles of protection and respect for workers applied and to see concretely expressed attention to the worker as a central and founding element of every company.

Method of satisfaction

Have attention to human resources , understanding the needs and monitoring the level of satisfaction . Identify improvement actions that can support corporate well-being.

4. SUSTAINABILITY REQUIREMENTS



PRINCIPLE 1 : NO POVERTY

Children have the right to play and enjoy their childhood without being forced to work.

4.1 CHILD LABOR

VICENZA PRECIOUS METALS SRL does not use or in any way support the use of child labour.

In any case, the company has defined a specific procedure for child and youth labor remedial actions entitled "Child Remediation Program", which highlights the activity of adequate financial and other support established by the company, necessary to the children and young workers involved to allow them to attend school and stay there until they no longer fall under the definition of child or young worker.

The procedure on child labor has been disclosed within the company, posted on the company bulletin board and made available to interested parties.

In the event that VICENZA PRECIOUS METALS SRL benefits from youth work, it would be managed in accordance with what is defined by national laws and, in any case, could only be carried out outside the hours of compulsory education.

Under no circumstances should the time spent between school, work and travel exceed 10 hours per day and under no circumstances should working hours exceed 8 hours per day. Young workers are prohibited from working at night and, in no case, will the company act to harm the physical and mental safety of the child or young worker.

In Vicenza Precious Metals srl the organizational structure is very streamlined and dynamic. Absolutely no minors are employed and the absence of child labor is monitored throughout the supply chain.

The staff has been present in the company for a few years. VPM is recently established, therefore the seniority follows the year of foundation of the company.

At the moment the company is made up of a higher percentage of males than females, but absolutely the company operates in compliance with gender equality and diversity.



GOALS 2023:

No use of child labour. In the event of its incorrect use, the implementation of remedial actions listed in the specific procedure.

Promotion of the apprenticeship.



PRINCIPLE 8 : DECENT WORK

Men have the right to be free and not be subject to any form of slavery or physical and mental violence .

4.2 FORCED AND COMPULSORY LABOR

There are no forms of forced labour. Overtime work is freely chosen, is not compulsory and must be authorised. The company does not keep any documents or money as a deposit to bind the worker. In the company there is ample freedom of expression and there is no support for human trafficking.

In order to facilitate the application of this requirement VICENZA PRECIOUS METALS SRL undertakes to ensure that all workers are fully aware of the rights and duties deriving from the employment contract through:

- Clear communication from the CCNL of work with which the staff is recruited
- Issue of a copy of the individual contract to the employee
- Availability by the Human Resources department to provide employees with all information related to contract, payroll, etc...

The company has perfectly under control the situation of holidays and staff permits. There are no leftover holidays and permits for anyone and there are always work breaks during the year for all staff , both employees and employees.



GOAL 2023

Not using forced and compulsory labour. Control of per capital overtime hours and days of holidays and leave accrued, used and residual during the year.



PRINCIPLE 3: HEALTH AND WELL-BEING

We guarantee health and safety in the workplace. We do training on the prohibition of the use of alcohol and drugs. We protect pregnant women and working mothers

4.3 HEALTH AND SAFETY

The Safety Committee of VICENZA PRECIOUS METALS SRL considers among the primary objectives of the company to protect the health and safety of workers, adopting procedures, performances, control systems and information and training systems in order to ensure:

- in carrying out work activities that safety aspects are considered essential;
- that all risks related both to the work activities carried out by the company's staff and related to the environment and corporate infrastructure are objectively identified and assessed;
- that all technical management measures are adopted to prevent or limit any accidental event that could cause accidents or damage to health;
- that all corporate figures, at various levels (executives, function managers, supervisors...) participate, on the basis of their duties and responsibilities, in achieving the workers' health and safety objectives;
- that their training is carried out and updated with specific reference to the task performed;
- that procedures with systems of control and compliance with them are defined.

All the obligations relating to the Consolidated Law 81 - 2008 are kept under control through special schedules.

With regard to accidents, the company confirms its desire to ensure a safe and healthy working environment.

The training and awareness-raising activities of the safety personnel continue in order to create a health and safety culture in the company.



GOAL 2023

Comply with all the requirements defined by the Consolidated Law 81/2008. Maintain a safe and healthy environment for everyone who works in the company .

4.4 FREEDOM OF ASSOCIATION AND RIGHT TO COLLECTIVE BARGAINING

All personnel have the right to train, organize, and participate in unions of their choice and bargain collectively with the organization. The company in no way hinders the possibility for workers to join a union.

Trade union meetings can be held periodically and freely within the company and during working hours, within the limits established by law, that is 10 hours per year paid per worker or outside working hours (unlimited hours) - see the provisions of the Workers' Statute Law 300/1970. S.m.i

The company currently has no union membership.

In any case, the Management does not in any way hinder the freedom of association.



GOAL 2023

Promote the well-being of workers by also guaranteeing freedom of association and not in any way hindering the choices of workers to join any trade union .



PRINCIPLE 5 AND 10 : GENDER EQUALITY AND REDUCTION OF INEQUALITIES

We guarantee equal opportunities; gender equality , equal pay, equal training

4.5 DISCRIMINATION

In the company there is no discrimination in recruitment, pay, access to training, promotion, termination of employment or retirement, on the basis of race, national, territorial or social origin, caste, birth, religion, disability, gender, sexual orientation, family responsibilities, marital status, union membership, political opinions, age, or any other condition that could give rise to discrimination.

In no case does VICENZA PRECIOUS METALS SRL interfere with the exercise of the rights of personnel to follow their own political, religious beliefs, family commitments and responsibilities, sexual orientation, needs related to their national or social origin, race, disability, gender, union membership, etc.

The company respects the forms of positive discrimination in the recruitment of protected categories within the limits provided by law. Law 68/99 stipulates that companies with more than 15 employees must employ at least one worker belonging to the protected categories. The legislation provides for an increase in these hires, as employees increase. Between 15 and 35 employees employ one disabled person, from 36 to 50 of two, from 51 to 150 in 7% plus one etc.

VICENZA PRECIOUS METALS SRL monitors the internal climate of the company in order to prevent cases of physical and verbal abuse and behavior that are threatening, offensive, exploitative or sexually coercive for all company workers wherever they operate.

In our company, the ethical team constantly monitors the absence of such situations and, if necessary, acts promptly to eliminate any form of possible discrimination.

The company in no way subjects workers to pregnancy tests or virginity.

The Management is made up of 100% men. Having been founded a few years ago, the company has not yet reached the final organizational structure.

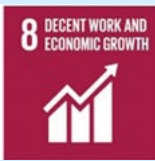
The company consists mainly of Italian nationals.



GOAL 2023: ensure equal access to employment opportunities and professional growth offered by Vicenza Precious Metals srl, encouraging opportunities in the company;

maintaining the current system of grading based on staff skills;

maintain a reward system based on staff skills.



PRINCIPLE 8 AND 10 : DECENT WORK AND REDUCING INEQUALITIES
We guarantee equal opportunities, gender equality, equal pay, equal training

4.6 DISCIPLINARY PRACTICES

The company treats all staff with dignity and respect. The company has implemented a system of gradual communication of violations by workers, in order to promote cohesion between management and workers together with an awareness on the part of workers of errors that must not be repeated because they are harmful to the health of the workers and to the efficiency of the company.

In particular, the main rule to be adopted is to follow a gradual process consisting of :

- verbal reminders
- written reminders
- fines
- suspensions
- dismissal

The application of these actions takes place in compliance with the established requirements:

- in T.U.81/2008;
- in the National Collective Agreement in the gold sector.

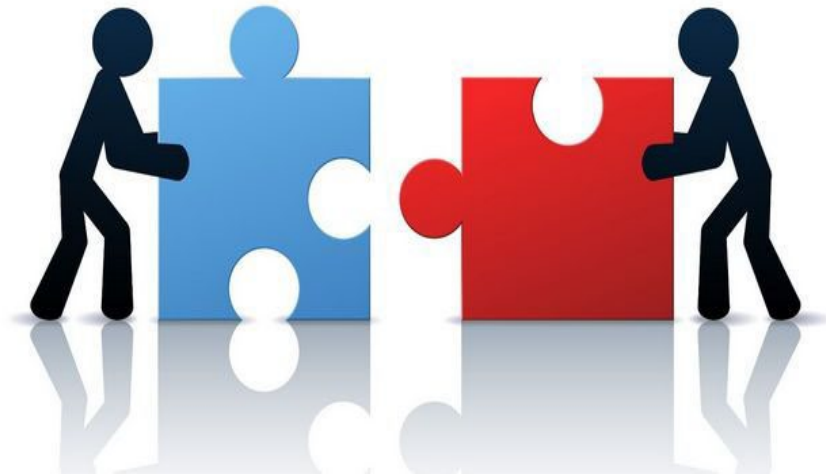
No disciplinary practices were managed during 2022.

In the company there is a reporting system, even anonymous, which can be used by workers to express complaints or to make suggestions. During 2022, there were no reports or complaints from workers or external stakeholders.



GOAL 2023

Have no disciplinary code violations and maintain a collaborative work environment.
Have equal pay for equal skills .



PRINCIPLE 8 : DECENT WORK

4.7 WORKING TIME

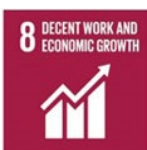
In VICENZA PRECIOUS METALS SRL working hours consist of 40 hours a week, 8 hours a day, 5 days out of 7. However, at least 1 day off after 6 working days is always guaranteed.

In particular, the company complies with the provisions of the national fashion collective agreement and Legislative Decree 66/2003. In particular: the average duration of normal working hours must not exceed 40 hours per week. The national contract requires no more than two hours of overtime a day and 8 hours a week. Furthermore:

- every worker has the right to a minimum rest period of 11 hours during the 24 hours;
- the work break is envisaged if the daily working time exceeds six hours;
- for each seven-day period, the worker must benefit from a minimum uninterrupted rest period of 24 hours, usually on Sundays, plus 11 hours of daily rest
- every worker must receive paid annual leave of at least four weeks.

Attendance tracking and monitoring of overtime hours is currently managed carefully.

During 2022, there were no particular problems in terms of overtime hours, as everyone complied with the 250 overtime hours per year .



GOAL 2023:

never exceed 250 hours of overtime per year; guarantee holidays and permits during the year as indicated by the CCNL applied.





PRINCIPLE 2 AND 8 : ZERO HUNGER AND DECENT WORK

4.8 REMUNERATION

The pay is consistent with the goldsmith commercial employment contract and is higher than livingwage. Company keeps a copy of CCNL in company available for workers .

Livingwage was calculated based on the subsistence wage calculated by ISTAT for a family in Northern Italy consisting of three people (two adults and a child from 4 to 10 years) living in a city of more than 50,000 inhabitants. The amount was increased by 10% as a discretionary wage; this calculation resulted in a value significantly lower than the minimum wage paid in the company.

Pay is given 1 time per month without any delay.

The remuneration includes all the deductions provided for by law and is always consistent with the hours worked and the role held. 100% of workers are covered by health care .



GOAL 2023:

Ensure decent pay. Ensure payment of salary 1 time per month without delays.





PRINCIPLE 6, 12, 13, 14, 15 : CLEAN WATER, RESPONSIBLE PRODUCTION AND CONSUMPTION, LIFE ON LAND, CLIMATE CHANGE AND LIFE UNDER THE SEA



4.9 ENVIRONMENTAL PROTECTION AND ENVIRONMENTAL PERFORMANCE

VICENZA PRECIOUS METALS SRL is based in Vicenza (VI). The company headquarters is located in an area used for both artisan and commercial use.

VICENZA PRECIOUS METALS SRL has identified an environmental management system manager with the task of overseeing compliance with all mandatory environmental regulations.

The company does not require environmental authorization and does not have waste management as it gives the waste to the municipal company. There are no emissions into the atmosphere, to the ground or acoustics that require specific authorizations and monitoring. The heating systems are regularly checked and the system is regularly registered in the CIRCE portal of the Veneto Region. The air conditioning systems are in good condition .

Water consumption is very low and linked to the use of the toilets.

Energy and gas consumption are also linked to office lighting and heating during the winter.



GOAL 2023

Increase handling of RJC COC material, especially recycled material.

4.10 ANALYSIS OF DUE DILIGENCE

VICENZA PRECIOUS METALS SRL has carried out a due diligence analysis on the principles of sustainability in accordance with the OECD Guidelines addressed to both its organization and the supply chain and counterparties. This has led to the realization of a risk analysis in order to identify any critical issues in compliance with the requirements of RJC Cop and to act promptly for their resolution through the implementation of corrective actions.

The supply chain has been qualified against a series of identified risks on required requirements and customers have been mapped to ensure that the entire supply chain complies with legality requirements, social responsibility

and sustainability required by sustainability standards. On the occasion of the drafting of the Sustainability Report, the list of qualified suppliers was approved and the adopted methodology confirmed .

4.11 THE MANAGEMENT SYSTEM

VICENZA PRECIOUS METALS SRL is equipped with a corporate social responsibility management system that complies with the requirements of the RJC Cop standard.

Below is a brief summary of the activities implemented to maintain the requirements of the applied ethical codes.

POLICY ON ETHICAL ACCOUNTABILITY: see the information at the beginning of the Sustainability Report.

MANAGEMENT REVIEW: on an annual basis, management examines the results of the sustainability system. On this occasion, the management verifies the achievement of all the objectives related to all the aspects examined and eventually sets corrective actions and approves the improvement plan.

PLANNING AND IMPLEMENTATION: with a view to continuous improvement for awareness of all personnel in charge of topics related to sustainability aspects, VICENZA PRECIOUS METALS SRL implements and prepares training plans that integrate courses at various levels of personnel in the training activities in relation to issues of sustainability.

Suppliers are constantly monitored through a system of gathering information and signing adherence to the principles of sustainability.





PRINCIPLE 17 : PARTNERSHIP TO ACHIEVE OBJECTIVES

CONTROL OF SUPPLIERS: The goal of VICENZA PRECIOUS METALS SRL is to help improve the conditions of workers throughout the production chain.

The company has established and maintains active procedures for evaluating and selecting suppliers, based on their ability to meet the requirements of applied ethical standards.

The requirements established for the achievement of business objectives in this field are:

- selection of reliable suppliers compliant with ethical requirements
- monitoring of supplier performance over time
- adoption by the supplier of any corrective action in the event of non-compliance with ethical requirements
- involvement of the supplier in the process of continuous improvement of the sustainability system..

The evaluation of the suppliers has been carried out asking the adhesion to the ethical requirements to all the suppliers, through dispatch of the form of adhesion.

VICENZA PRECIOUS METALS SRL keeps records about the commitment of its suppliers, regarding social responsibility, including among other things their written commitment to:

- meet all requirements of the RJC COP standard
- participate in the surveillance activities implemented by VICENZA PRECIOUS METALS SRL .

- promptly remedy any identified non-compliance with the requirements of the RJC CoP standard.
- Immediately and completely inform VICENZA PRECIOUS METALS SRL of all corporate relationships with their other suppliers or relevant sub-contractors regarding the supplies requested.
- Provide collaboration during any inspections that VICENZA PRECIOUS METALS SRL will hold at their premises

PROBLEMS AND CORRECTIVE ACTIONS: the complaints management of the sustainability system guarantees, through the application of the recall/reporting procedure, the possibility for the interested parties to transmit reports or complaints, or provide information regarding the ethical management system, as well as compliance with the system requirements and the standard of reference. Communications in written form (also in anonymous form with regard to employees) may concern:

- Third parties (suppliers, customers, etc.); these communications must be sent by post, fax or e-mail to the contacts indicated on the form available on the **company website**.
- Employees and internal collaborators. Such communications can be direct involving representatives of the ethical team or in written form as dictated in the Manual of Social Responsibility and as summarized in the complaint form / reporting.

In 2022 VICENZA PRECIOUS METALS SRL received no reports from interested parties .

ANTI-CORRUPTION AND FRAUD : The company has put in place a system of constant monitoring of operating practices in order to avoid situations of corruption or fraud. During 2022, no non-conformities were identified on these issues and no reports were received from either internal or external stakeholders.

In fact, the company has a system, even anonymous, for reporting any type of violation related to this issue. Appropriate training is carried out annually on anti-corruption issues for professionals particularly at risk in this area.



GOAL 2023:

- 0 reports for violations of the sustainability principles
- 0 cases of corruption

INTERNAL COMMUNICATION: the company aims to disseminate and make available the information on the RJC to all employees and contractors of the company. This initiative, in line with the corporate line and dissemination of information and the activities carried out, stems from the awareness of the importance of involving employees on the issues addressed by ethical standards. In this regard, the company makes the Ethics Policy available on the company bulletin board, carries out training on ethical and sustainability principles for all personnel and makes a copy of the Sustainability Report available at the company reception. .

the multiplication of information media in recent years.

Listening to customer needs and having a dialogue with them are activities that provide a useful listening channel for verifying the level of user satisfaction, and for knowing the perception of the company in a timely and comprehensive manner.

The channels used to transmit this data externally are:

- website on the internet
- email communication to customers and suppliers

EXTERNAL COMMUNICATION: communicating in detail and informing in the correct way has always been a priority objective for VICENZA PRECIOUS METALS SRL, a need that has grown hand in hand with

REGISTRATION: VICENZA PRECIOUS METALS SRL maintains appropriate records required by the management system for social responsibility and sustainability in order to give evidence of compliance with the requirements of the ethical and sustainability standards to which it adheres.

