

VPM VICENZA
PRECIOUS
METALS



Developed according to the UN AGENDA 2030 PRINCIPLES, GRI INDICES
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1. GENERAL CONSIDERATIONS

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 an account of the actions carried out and the 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 developed by the Company Management, in collaboration with the other members of the Sustainability Team, in compliance with the requirements of the UN 2030 agenda and the Global Reporting Initiative (GRI) indicators used as guidelines to address these aspects in a systematic way.

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 dual value:

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

1.2 RECIPIENTS

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

- ✓ COMPANY STAFF;
- ✓ COLLABORATORS;
- ✓ CLIENTS;
- ✓ BUSINESS PARTNERS;
- ✓ LOCAL COMMUNITY;
- ✓ PROVIDERS;
- ✓ SUBCONTRACTORS;
- ✓ LABOR UNIONS.

The company asks these subjects to participate, directly or indirectly, in this common commitment to safeguard the environment and protect fundamental human rights.

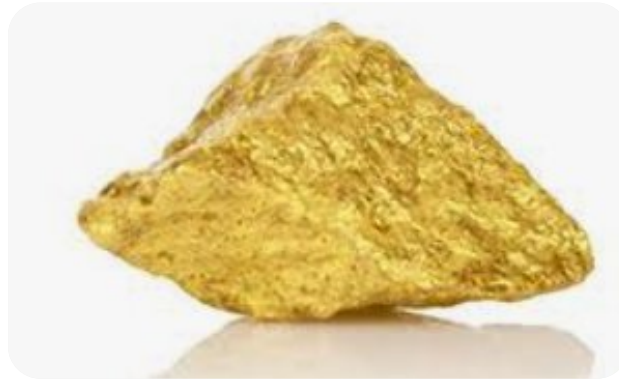
1.3 OBJECTIVES

The objective of the Sustainability Report and Review is to provide an account of the initiatives developed by VICENZA PRECIOUS METALS SRL and to communicate, in a clear and transparent manner to all interested parties, the results obtained in the field of social responsibility and sustainability.



More specifically, the Sustainability Report and Review aims to:

- 01** Evaluating ethical values, social commitments, principles and reference rules, with a view to continuous improvement.
- 02** Provide information on social impacts che derivano dalle scelte della
- 03** Promote dialogue, the involvement and consent of interested parties.
- 04** Fully implement the Sustainability System (also through certification)



1.4 REGULATORY

The organization shall comply with local, national and other applicable laws, prevailing industry standards, other requirements to which the organization adheres, as well as this Standard. Where such laws, standards or other requirements to which the organization adheres and this Standard cover the same topic, the provision that is most favorable to workers shall apply. The organization shall also comply with the principles of the following international instruments:

ELEMENTS

- RJC COP 2019 and RJC COC 2017 standards
- Consolidated Law 81/2008 Health and Safety of Workers
- European Privacy Regulation 679/2016
- CCNL for goldsmith workers
- Workers' Statute Law 300/1970
- Dignity Decree (D.L.87/2018)
- Law 68/99 hiring protected categories
- Legislative Decree 66/2003 Organization of working hours
- Guidelines for the construction of models organization and control Legislative Decree 231
- Legislative Decree 152/2006
- ILO Convention 1 (Hours 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 Organise)
- ILO Convention 98 (Right to Organise and Collective Bargaining)
- ILO Conventions 100 (Equal Remuneration) and 111 (Discrimination – Employment and Occupation)
- 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 (Occupational Safety and Health)
- ILO Convention 159 (Professional and occupational reintegration - persons with disabilities)
- ILO Convention 169 (Indigenous and tribal peoples)
- ILO Convention 177 (Home Work)
- ILO Convention 181 (Private Employment Agencies)
- ILO Convention 182 (Worst Forms of Child Labour)
- ILO Convention 183 (Maternity Protection)
- 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 Enterprises
- Uni/Pdr 125:2022 on Gender Equality
- G.U. 176 of 07/29/2022 Transparency Decree
- ISO 30415 – Diversity & Inclusion

- Transparency Decree Legislative Decree 104
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 gold, silver and platinum ingots and bars.

The company complies with all mandatory industry regulations, in addition to national regulations relating to the health and safety system (T.U. 81/2008), the European regulation on privacy (679/2016), regulations relating to the use of chemical products (Reach Regulation 1907/2016), the application of the Environmental Consolidated Law 152/2016 and all regulations relating to Labor Law.



THE MARKET

The market in which the company operates is local, national and international. The company is able to market precious metals by supplying them to a wide range of customers .

THE COMPETITION

The competition is made up of other companies in the territory able to carry out the trading service.

THE SUPPLIERS

Vicenza Precious Metals suppliers are companies that have undergone careful qualification from a sustainability point of view. All suppliers adhere to the sustainability principles expressed in the RJC Sustainability Policy.

THE EMPLOYEES

The employees of VICENZA PRECIOUS METALS SRL are mainly personnel dedicated to commercial activities and order management. All personnel are trained for the role they cover or monitored in this regard. The goal is to always have competent personnel in the role they are called to cover. The company's goal is to have and give confidence to the employee in the assigned role, highlighting the importance of each worker in achieving company results.

THE COMPANY HEADQUARTERS

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



OUR

VALUES



2.2 ORGANIZATION

ORGANIZATIONAL STRUCTURE AND RESPONSIBILITIES

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



2.3 SUSTAINABILITY TEAM

The sustainability team is composed of management representatives and employee representatives.

The main responsibilities regarding the Sustainability System are summarized below:

responsibilities
Sustainability System summarized

The sustainability team is composed of management representatives and workers 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
- Presides over the management review in order to verify the and effectiveness of the System Policy in order to define the improvement actions to be implemented
- Approves the Budget 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
- Develops the Sustainability Report and Review with the collaboration of other members of the sustainability team and any interested parties.



SUSTAINABILITY TEAM

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



2.4 CORPORATE SUSTAINABILITY POLICY

VICENZA PRECIOUS METALS S.p.A. participates in the development of the training plan consistent with the principles of the UN Agenda 2030, the RJC COC and GRI standards and the GRI indicators.

To this end, the company undertakes to adhere to and comply with:

- all requirements of the RJC COC and COF standards
- to the Conventions of the International Labour Organization (ILO)
- to the United Nations Convention on the Rights of the Child
- to the Universal Declaration of Human Rights
- the United Nations Convention on the Elimination of All Forms of Discrimination against Women and All Forms of Racial Discrimination
- the International Covenant on Civil and Political Rights and on Economic, Social and Cultural Rights.
- to all national and international laws on the matter, 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 Consolidated Environmental Law

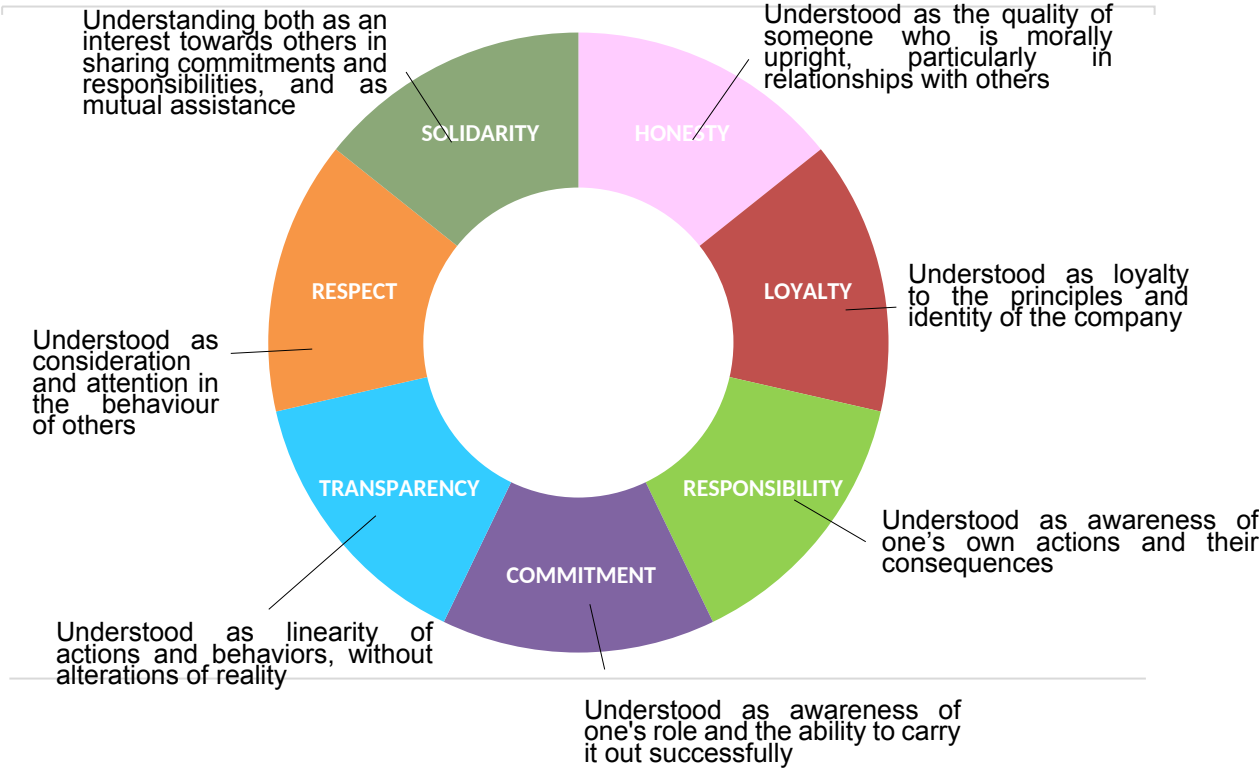
The general objectives that the company intends to achieve and maintain are:

- Prevention of situations that are harmful to the rights of the individual
- Increased efficiency of its organizational structure and supply chain
- The diffusion of a culture of social responsibility through a permanent
- The company is committed to respecting the principles set out in the Sustainability System and, in carrying out its activities, requires its employees / collaborators / suppliers to comply with the regulatory requirements in



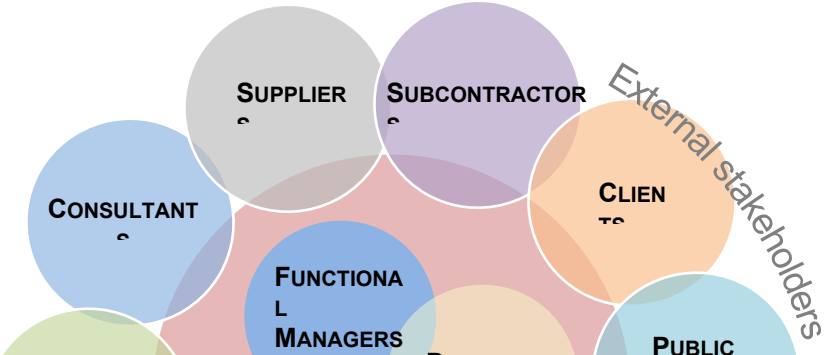
2.5 VALUES

VICENZA PRECIOUS METALS SRL, consequently, 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, requirements and interests towards the company.

In general:

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

With respect to external stakeholders, sustainability is expressed in a varied manner and in relation to the roles that each of them assumes and which can be summarised in the awareness of interacting with a company whose attention to sustainability is evident, certified by independent bodies and made explicit also through this management review.

In particular:

COMPANY MANAGEMENT

The ethical requirement is to produce profit and business growth without compromising its own sustainability, through the failure to respect the rights of the resources used (human and environmental), as well as producing and creating benefit from the dissemination of the ethical principles that support it.

Satisfaction Mode

Try to increase profits by identifying a business that is increasingly attentive to sustainability, generating the benefits of internal and external satisfaction necessary to achieve economic objectives and personal and team gratification.

FUNCTIONAL MANAGERS

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

Satisfaction Mode

Adhere to continuous improvement projects for corporate sustainability, report results objectively and identify possible developments and growth opportunities year after year.

CORPORATE PARTNERS

The need for business partners (e.g. contractors) is to share sustainability principles in order to spread trust among stakeholders and a team spirit in facing the challenges of our time.

Satisfaction Mode

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

STAFF AND COLLABORATORS

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

Satisfaction Mode

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 aptitudes and aspirations, continuously improving the effectiveness of the methods defined to achieve the ethical objectives set.

SUPPLIERS

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

Satisfaction Mode

Establish clear collaborative relationships and create a partnership in the activity aimed at respecting the rights of its workers and collaborating on jointly identified improvement actions. Sustainability is achieved through teamwork: therefore, ethical and environmental principles are shared with all actors in the supply chain.

CLIENTS

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

Satisfaction Mode

Satisfy customer needs by creating long-lasting collaborations, define a communication channel with them that allows receiving reports, suggestions and complaints. Monitor customer sustainability by promoting sustainability principles and encouraging their adherence .

COMMUNITY

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

Satisfaction Mode

Build over time a sustainable business model that can contribute to satisfying the image needs of the community in which we grow and concretely inspire all the subjects that are part of it (businesses and citizens); spread wealth in the territory by creating jobs.

LABOR UNION

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

Satisfaction Mode

Pay attention to human resources, understanding needs and monitoring satisfaction levels. Identify improvement actions that can support corporate well-being.

4. SUSTAINABILITY REQUIREMENTS



PRINCIPLE 1 : NO POVERTY
Children have the right to play and live their childhood without being forced to work.

4.1 CHILD LABOUR

VICENZA PRECIOUS METALS SRL does not resort to, nor does it in any way support, the use of child labor.

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

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

In the event that VICENZA PRECIOUS METALS SRL makes use of youth labor, it would be managed as defined by national laws and, in any case, could only be carried out outside of compulsory school hours. In no case may the time spent between school, work and travel exceed 10 hours per day and in no case should working hours exceed 8 hours per day. Young workers are prohibited from working at night and, in no case, will the company act in order to harm the physical and mental safety of the child or young worker.

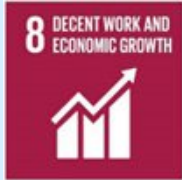
In Vicenza Precious Metals srl the organizational structure is very streamlined and dynamic. No minors are hired at work and the absence of child labor is monitored throughout the supply chain.

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

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

OBJECTIVE 2024:

No use of child labor. In the event of incorrect use, implementation of remedial actions listed in the specific procedure.
Apprenticeship promotion.

**PRINCIPLE 8 : DECENT WORK**

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

4.2 FORCED AND COMPULSORY LABOUR

There are no forms of forced labor. Overtime is freely chosen, is not mandatory and must be authorized. The company does not retain any documents or money as a deposit to force the worker. There is broad freedom of expression in the company and no support is given to human trafficking. In order to promote the application of this requirement, VICENZA PRECIOUS METALS SRL is committed to ensuring that all workers are fully aware of the rights and duties arising from the employment contract through:

- Clear communication of the collective labor agreement under which the staff is hired
- Issuing a copy of the individual contract to the worker
- Availability of the human resources office to provide collaborators with all information relating to contracts, pay slips, etc...

The company has the staff's holidays and leave situation perfectly under control. There are no holidays and leave left for anyone and work breaks are always taken during the year for all staff, both employees and collaborators.

**OBJECTIVE 2024**

Non-use of forced and compulsory labour. Control of overtime hours per capita and days of vacation and leave accrued, enjoyed and remaining in the year.

**PRINCIPLE 3 : HEALTH AND WELLBEING**

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

4.3 HEALTH AND SAFETY

The Safety Committee of VICENZA PRECIOUS METALS SRL considers that one of the primary objectives of the company is to protect the health and safety of workers, by 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 connected to both the work activities carried out by the company's personnel and those linked to the company's environment and infrastructure are identified and objectively assessed;
- that all technical and management measures are adopted aimed at preventing or limiting any possible accidental event that could cause injury or damage to health;
- that all company figures, at various levels (managers, function managers, supervisors, etc.) participate, based on their own responsibilities and skills, in achieving the health and safety objectives of workers
- that their training is carried out and updated with specific reference to the task performed;
- that procedures are defined with control systems and compliance with the same.

All the obligations relating to the Consolidated Law 81 – 2008 are monitored through specific deadlines.

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

The training and awareness-raising activity of the staff on safety continues in order to create a culture of health and safety in the company.



OBJECTIVE 2024
 Comply with all the requirements defined by the Consolidated Law 81/2008. Maintain a safe and healthy environment for all those who work in the company.

4.4 FREEDOM OF ASSOCIATION AND RIGHT TO COLLECTIVE BARGAINING

All employees have the right to form, organize, and join unions of their choice and bargain collectively with the organization. The company does not in any way hinder the ability of employees to join a union. Union meetings can be held periodically and freely within the company and during working hours, within the limits established by law, i.e. 10 paid hours per year per worker or outside of working hours (unlimited number of hours) – see the provisions of the Workers' Statute Law 300/1970. S.m.i
 The company does not currently have any union members.
 In any case, the Company Management does not hinder freedom of association in any way.



OBJECTIVE 2024
 Promote the well-being of workers by also guaranteeing freedom of association and not hindering in any way the workers' choices to join any trade union .



PRINCIPLE 5 AND 10 : GENDER EQUALITY AND REDUCING INEQUALITIES
 We guarantee equal opportunities; gender equality, equality in pay, training

4.5 DISCRIMINATION

There is no form of discrimination in the company in hiring, remuneration, access to training, promotion, termination of employment or retirement, based on 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 its staff to follow their own political or religious beliefs, family commitments and responsibilities, sexual orientation, needs related to their national or social origin, race, disability, gender, union membership, etc.
 The company tends to respect the forms of positive discrimination in the hiring of protected categories within the limits established by law. Law 68/99 establishes that companies with more than 15 employees must hire at least one worker belonging to the protected categories. The legislation provides for an increase in these hirings, with the increase in employees. From 15 to 35 employees provides for the hiring of one disabled person, from 36 to 50 two, from 51 to 150 in a percentage of 7% plus one etc. VICENZA PRECIOUS METALS SRL monitors the internal corporate climate in order to avoid cases of physical and verbal abuse and behaviors that are threatening, offensive, exploitative or sexually coercive for all company workers wherever they operate.
 In our company, the ethics team constantly monitors the absence of such situations and, if necessary, intervenes promptly to eliminate any form of possible discrimination.
 The company in no way subjects workers to pregnancy or virginity tests.
 The company management is composed of 100% men. Having been founded a few years ago, the company has not yet reached its definitive organizational structure.
 The company is composed mainly of personnel of Italian nationality.



OBJECTIVE 2024: ensure equal access to employment and professional growth opportunities offered by Vicenza Precious Metals srl, promoting opportunities within the company;
 maintain the current classification system 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, equality in wages, training

4.6 DISCIPLINARY PRACTICES

The company treats all staff with dignity and respect. A system of gradual communication of violations by workers has been implemented in the company, in order to encourage cohesion between management and workers together with an awareness by workers of the 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 adopt is to follow a gradual process consisting of :

- verbal warnings
- written warnings
- fines
- suspensions
- dismissal

The application of such actions takes place in compliance with the requirements set out:

- in Consolidated Law 81/2008;
- in the National Collective Agreement for the goldsmith sector.

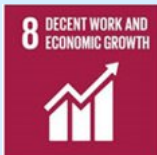
No disciplinary practices were handled during 2022.

The company has a reporting system, including anonymous reporting, that can be used by workers to express complaints or make suggestions. During 2022, there were no reports or complaints from workers or external stakeholders.



OBJECTIVE 2024

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



PRINCIPLE 8 : DECENT WORK

4.7 WORKING HOURS

In VICENZA PRECIOUS METALS SRL the working hours are 40 hours per week, 8 hours per day, 5 days out of 7.

At least 1 day off is always guaranteed after 6 days of work.

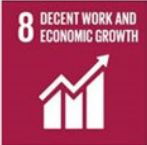
In particular, the company complies with the provisions of the national collective fashion agreement and Legislative Decree 66/2003. In particular: the average duration of normal working hours must not exceed 40 hours per week. The national contract requires that no more than two hours of overtime be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

Furthermore:

- every worker is entitled to a minimum rest period of 11 hours during the 24 hours;
- a work break is provided if the daily working hours exceed six hours;
- for every seven-day period the worker must benefit from a minimum uninterrupted rest period of 24 hours, usually on Sunday, to which are added the 11 hours of daily rest;
- every worker must benefit from paid annual leave of at least four weeks.

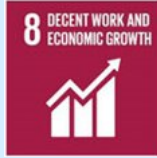
Currently, attendance tracking and monitoring of overtime hours are managed carefully.

During 2022, no particular critical issues were detected in terms of overtime hours, with everyone having fully respected the 250 annual overtime hours.



OBJECTIVE 2024:
never exceed 250 hours of overtime per year; guarantee holidays and permits during the year as indicated in the applied CCNL.





PRINCIPLE 2 AND 8 : ZERO HUNGER AND DECENT WORK

4.8 REMUNERATION

The remuneration is consistent with the goldsmith sector employment contract and is higher than the living wage. The company keeps a copy of the CCNL in the company available for workers.

The living wage 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 old) 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 by the company.

The wage is given once a month without any delay.

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



OBJECTIVE 2024:

Ensure decent wages. Ensure payment of wages once a 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 artisanal area.

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

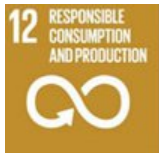
The company does not require environmental authorization and does not have waste management as it delivers waste to the municipal company. There are no emissions into the atmosphere, soil or noise that require specific authorizations and monitoring. The heating

systems are regularly checked and the system is regularly registered on the Veneto Region portal CIRCE..

The air conditioning systems are in good condition.

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

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



OBJECTIVE 2024

Increase management of RJC COC material, especially recycled material.

4.10 DUE DILIGENCE ANALYSIS

VICENZA PRECIOUS METALS SRL has carried out a due diligence analysis relating to the principles of sustainability in accordance with the OECD Guidelines aimed at both its own organization and the supply chain and counterparties.

This led to the creation of a risk analysis in order to identify any critical issues in compliance with the RJC Cop requirements and to act promptly for their resolution through the implementation of corrective actions.

The supply chain has been qualified in light of a series of risks identified on the basis of the required requirements and the clientele has been mapped in order to ensure that the entire supply chain complies with the requirements of legality, social responsibility and sustainability required by the sustainability standards. When drafting the Sustainability Report, the list of qualified suppliers was approved and the methodology adopted was confirmed. The analysis of the current risk does not show any particular critical issues as all the assessed risks are kept under control or mitigated by appropriate procedures applied.

4.11 MANAGEMENT SYSTEM

VICENZA PRECIOUS METALS SRL has adopted a corporate social responsibility management system compliant 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.

ETHICAL RESPONSIBILITY POLICY: see what is reported at the beginning of the Sustainability Report.

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

PLANNING AND IMPLEMENTATION: with a view to continuous improvement for an awareness of all the personnel in charge for the topics related to sustainability aspects, VICENZA PRECIOUS METALS SRL implements and prepares training plans that integrate courses at various levels of personnel in relation to sustainability issues into the training activities. Suppliers are constantly monitored through a system of information collection and subscription of adherence to the principles of sustainability.





PRINCIPLE 17 : PARTNERSHIP TO ACHIEVE GOALS

SUPPLIER CONTROL: the objective of VICENZA PRECIOSO METALS SRL is to contribute to improving the conditions of workers throughout the production chain.

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

The requirements established for achieving business objectives in this field are:

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

Operationally, the supplier evaluation was carried out by asking all suppliers to adhere to the ethical requirements, by sending the membership form.

VICENZA PRECIOSO METALS SRL keeps records of the commitment of all its suppliers, in relation to social responsibility, including among other things their written commitment to:

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

- promptly remedy any identified non-conformities against the requirements of the RJC CoP standard.
- Immediately and fully inform VICENZA PRECIOSO METALS SRL of all business relationships with their other relevant suppliers or subcontractors in relation to the requested supplies.
- Provide collaboration during any inspections that VICENZA PRECIOSO METALS SRL will carry out at their premises

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

- Third parties (suppliers, customers, etc.); such communications must be sent by post, fax or email to the contacts indicated on the form available on the **company website**.
- Employees and internal collaborators. Such communications may be direct involving representatives of the ethics team or in written form as detailed in the Social Responsibility Manual and as summarised in the complaint/report form.

In 2023 VICENZA PRECIOSO METALS SRL did not receive any reports from interested parties.

ANTI-CORRUPTION AND FRAUD : The company has implemented a system of constant monitoring of operating practices in order to avoid situations of corruption or fraud. During 2022, no non-conformities were detected 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 who are particularly at risk in this area.



OBJECTIVE 2024:
0 reports for violations of 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 collaborators of the company. This initiative, in line with the company line and dissemination of information and activities carried out, arises from the awareness of the importance of involving employees in the issues addressed by the ethical standards. In this regard, the company makes the Ethics Policy available on the company noticeboard, carries out training on ethical and sustainability principles for all staff and makes a copy of the Sustainability Report available in the company reception.

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 in step with

the multiplication, in recent years, of the means of information. Listening to customer needs and communicating with them are activities that provide a useful listening channel to verify the level of user satisfaction, and to know the perception of the company in a timely and exhaustive manner. The channels used to transmit such data to the outside are:

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

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

