

Contact Information

COMPANY NAME: **VALMET SRL SOC. UNIPERSONALE**
DATE: **22/02/2024**
REPORTING PERIOD: **01/01/2023 – 31/12/2023**
CONTACT: **ilaria.bello@valmet.it**

COMPANY MANAGEMENT SYSTEMS

VALMET srl have the following policies in place:

- *Company Policy rev.5 dated 22/02/2024*
- *Code of Ethics and Conduct rev.2 dated 22/02/2024*
- *Disciplinary code rev.2 dated 22/02/2024*
- *Anti-corruption code rev.2 dated 22/02/2024*

Our policies detail our commitment to respect human rights throughout our supply chain and our supply chain due diligence on the following minerals: *gold, silver and PGM (platinum group metals)* originating from conflict-affected and high-risk areas. **VALMET srl** endorse these policies to our suppliers and stakeholders by distributing them via website link <https://refining.valmet.it/index.php/autorizzazioni-e-certificazioni/> or e-mail; these policies can also be accessed by our internal stakeholders via notice boards where all policies are present and externally via website link <https://refining.valmet.it/index.php/autorizzazioni-e-certificazioni/>.

To support supply chain due diligence, we have implemented the following internal measures:

- *Suppliers Risk Assessment*
- *Supply chain Policy*
- *RJC Manual rev.5 dated 17/11/2023*
- *Annual Review*

The senior manager responsible for overseeing supply chain due diligence is *Ilaria Bello as RJC and Administrative Responsible*. To aid us in identifying our human rights impacts we have developed and implemented the following systems:

- *Human Rights Due Diligence*

we have the following human rights policy in place *Company Policy rev.5 dated 22/02/2024* and *Code of Ethics rev.2 dated 22/02/2024*. The senior manager responsible for overseeing our human rights impacts is *Ilaria Bello as RJC and Administrative Responsible*.

VALMET srl have established a system of controls and transparency over our supply chain, which include our approach for identifying suppliers and identifying sources of our precious metal materials; all precious metal materials suppliers are listed in our *Risk Assessment* where is identified:

- Supplier name
- Supplier addresses
- Forniture
- Certifications
- Risk level

As a company we communicate our expectations regarding human rights and supply chain due diligence by sending to our precious metal materials suppliers via e-mail our *Company Policy*, *Code of Ethics* and our *Supplier Disclosure* to be signed. In addition to this, when needed, we also take an audit to strengthen our engagement with suppliers; the outcome of doing so has been very positive, all our suppliers are RJC certified and accepted our policies; the risk of our supply chain is **LOW**.

Our grievance mechanism for internal and external stakeholders can be accessed via website

<https://refining.valmet.it/index.php/autorizzazioni-e-certificazioni/>

Till today **no grievances have been received**. The employee responsible for these grievance mechanisms is *Ilaria Bello as RJC and Administrative Responsible*.

IDENTIFIED & ASSESSED RISKS

We assess our own and supplier's due diligence practices and those relating to human rights by using

- *Human Rights Due Diligence*
- *Suppliers Evaluation Risks*

During our assessment of our own and our supplier's due diligence practices and those relating to human rights, we identified **none HIGH potential and actual risks within our supply chain**.

In the reporting period, **VALMET srl** had no complaints or reports cases of corruption cases involving its own personnel or personnel of its suppliers, as well as continues not to make use of facilitating payments; **VALMET srl** had neither complaints or reports cases of money laundering and terrorist financing, including through the analyses of auditing bodies and banks.

The Management confirms the **CA** Anti-Corruption Code rev.2 dated 22/02/2024.

STRATEGY

Our risk assessment findings are received by *Ilaria Bello as RJC and Administrative Responsible*.

To respond to eventual risks identified within our supply chain, we use our Risk Management Plan as described in our system procedures. Our risk management plan consists of:

- Risks Identification
- Processes involved
- Stakeholders
- Root causes analysis
- Consequences
- Risks evaluation (Probability x Severity)
- Strategy to respond to the risks and impacts identified
- Timescales
- Action taken

VALMET srl provided the training regarding human rights to our employees on 14/04/2023; this training included information on:

- Standard RJC-COP-April-2019
- Standard RJC-CoC-2017-Chain of Custody
- Responsible supply chain

- Human Rights and Working Conditions
- Health, Safety and Environment
- Corporate Policy
- Social and Human Rights
- Commercial, Anti-Corruption, Anti-Bribery and Anti-Money Laundering Policy
- Security

VALMET srl communicate to our stakeholders regarding our due diligence activities and efforts to prevent human rights risks. This communication is in the form of *Annual Report* published on the website link

<https://refining.valmet.it/index.php/autorizzazioni-e-certificazioni/>

When a human rights risk is identified we communicate the risk and how we are addressing it to potentially affected stakeholders by sending e-mail.

Since our last report no grievances have been raised

CARRY OUT A THIRD PARTY AUDIT (OPTIONAL INFORMATION)

VALMET srl has joined the RJC in February 2019 and achieved the COP & CoC certification for the first time in September 2019.

In support of our continuous improvement journey, our third-party RJC surveillance audit will take place within our organisation against the RJC CoC 2017 on March 2024.