

Contact Information

COMPANY NAME: **VALMET SRL SOC. UNIPERSONALE**

DATE: **31/03/2025**

REPORTING PERIOD: **01/01/2024 – 31/12/2024**

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 implemented the *Human Rights Due Diligence*

During this analysis no **HIGH** risks have been revealed

we have the following human rights policy in place, published on the website

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

- *Company Policy rev.5 dated 22/02/2024*
- *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

During the past year no audits were carried out at subcontractors

NR SUPPLIERS (for precious metals)	8
NR SUPPLIERS CERTIFIED RJC COP, LBMA or banks	7
NR SUPPLIERS CERTIFIED RJC CoC	6
NR REFINERS	3
NR REFINERS CERTIFIED RJC COP or LBMA	3
NR REFINERS CERTIFIED RJC CoC	3
NR SUBCONTRACTORS	2
NR SUBCONTRACTORS CERTIFIED (RJC, LBMA, etc...)	2
NR SUBCONTRACTORS CERTIFIED RJC CoC	2
NR SUBCONTRACTORS FOR CoC MATERIALS	2
NR AUDIT TO SUBCONTRACTORS FOR CoC MATERIALS	0
NR OF LOW RISK LEVEL SUPPLIERS AND SUBCONTRACTORS	7
NR OF MEDIUM RISK LEVEL SUPPLIERS AND SUBCONTRACTORS	1
NR OF HIGH RISK LEVEL SUPPLIERS AND SUBCONTRACTORS	0

The *risk level* doesn't mean simply the risk of precious metals provenience but is calculated considering the following parameters:

- Geographyc location of the supplier
- Company certifications (RJC, LBMA, SA800,)
- Document of legal representative
- Company registration report
- KYC documentation

To every supplier and subcontractor not certified or with a risk level not LOW is sent the following documentation:

- *Subcontractor commitment IF001*
- *Internal Audit* (if necessary)

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 *Subcontractor commitment* 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 out 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.

In the reporting period, the following quantities of precious metals entered the company

2024	DIAMMINO RJC	TETRAMMINO	COMPLEX FINO	AU 146,41	AU 100	AU 58	ORO PURO	ARGENTO PURO	PALLADIO PURO
In giacenza dall'anno precedente (kg)	0	7,1	2,7	16,4	2,7	2,2	0,1	9	0
Acquistato nell'anno di riferimento (kg)	0	173,3	57,5	397,5	96	13,2	18,7	739,2	1,3
Venduto nell'anno di riferimento (kg)	0	172,5	51,7	409,7	87,9	13	16,7	739,2	1,2
In giacenza a fine anno di riferimento (kg)	0	7,9	8,5	4,2	10,8	2,4	2,1	9	0,1
Numero TD ricevuti	0	57	34	127	40	9	19	19	11
Numero TD emessi	0	270	110	569	85	27	21	36	9

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*
- *Ethics Risk Assessment*

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 June 2025.