

### Contact Information

COMPANY NAME: **FRESCHI & VANGELISTI srl**  
DATE: **31/01/2024**  
REPORTING PERIOD: **01/01/2023 – 31/12/2023**  
CONTACT: **a.giannotti@frevan.com**

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### COMPANY MANAGEMENT SYSTEMS

**FRESCHI & VANGELISTI srl** have the following policies in place:

- *Integrated ethics Policy rev.08/03/2023*, detailing 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.
- *Environmental Policy rev.18/07/2022*
- *Health & Safety Policy rev.16/01/2024*

**FRESCHI & VANGELISTI srl** endorse these policies to our suppliers and stakeholders by distributing them via website link [www.frevan.com](http://www.frevan.com) 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 [www.frevan.com](http://www.frevan.com).

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

- *Suppliers Risk Assessment*
- *Integrated ethics Policy*
- *RJC manual*
- *Annual Review*

The senior manager responsible for overseeing supply chain due diligence is *Michele Bachini* as *Supply Chain Manager*.

To aid us in identifying our human rights impacts we have developed and implemented the following systems:

- *Human Rights Evaluation Risk*

we have the following human rights policy in place - *Integrated ethics Policy rev.08/03/2023*. The responsible for overseeing our human rights impacts is *Alessandro Giannotti* as *QHSE Manager*.

**FRESCHI & VANGELISTI 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
- Fourniture
- 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 *Integrated ethics Policy, Environmental Policy, Health & Safety*

*Policy* 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 stakeholders can be accessed via *Reporting Box* that can be found in the break area and in the woman's locker room, our external grievance mechanism is available via **website** <https://www.frevan.com/>

**Till today no grievances have been received. The employee responsible for these grievance mechanisms is Alessandro Giannotti as QHSE Manager.**

#### IDENTIFIED & ASSESSED RISKS

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

- *Human Rights evaluation risk*
- *Suppliers evaluation risks*
- *Harassment 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.

#### STRATEGY

Our risk assessment findings are received by *Alessandro Giannotti as QHSE Manager*.

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

**FRESCHI & VANGELISTI srl** provided the training regarding human rights to our employees on 22/09/2023; this training included information on:

- Standard RJC-COP-April-2019
- Standard RJC-CoC-2017
- Responsible supply chain
- Human Rights and Working Conditions
- Health, Safety and Environment
- RJC Policy
  - o Social and Human Rights
  - o Commercial, Anti-Corruption, Anti-Bribery and Anti-Money Laundering Policy
  - o Security
  - o Environment
  - o Health & Safety

**FRESCHI & VANGELISTI 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://www.frevan.com/>. 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)

**FRESCHI & VANGELISTI srl** has joined the RJC in November 2013, achieved COP certification on December 2021 and CoC certification on February 2022.

In support of our continuous improvement journey, our third-party RJC audit will take place within our organisation against the RJC COP 2019 and CoC 2017 on November 2024.