

Contact Information

COMPANY NAME: **FRESCHI & VANGELISTI srl**
DATE: 21/01/2025
REPORTING PERIOD: **01/01/2024 – 31/12/2024**
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COMPANY MANAGEMENT SYSTEMS

FRESCHI & VANGELISTI srl have the following policies in place:

- *Integrated ethics and RJC 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*
- *Energy Policy rev.27/07/2023*

These policies detail our commitment to respect human rights throughout our supply chain on the following minerals:

- Gold
- Silver
- PGM

FRESCHI & VANGELISTI srl endorse these policies to our suppliers and stakeholders by distributing them via website link 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.

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

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

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*
- *Internal audits*
- *Internal staff satisfaction questionnaires*
- *SA8000 Management system manual*

During these analyses no **HIGH** risks have been revealed

we have the *Integrated ethics Policy rev.08/03/2023* published on the website www.frevan.com.

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
- Furniture
- Certifications
- Risk level

During the past year 13 audits were carried out at subcontractors

NR SUPPLIERS (for precious metals, diamonds and precious stones)	4
NR SUPPLIERS CERTIFIED RJC COP, LBMA or banks	3
NR SUPPLIERS CERTIFIED RJC CoC	3
NR REFINERS	2
NR REFINERS CERTIFIED RJC COP or LBMA	2
NR REFINERS CERTIFIED RJC CoC	2
NR SUBCONTRACTORS	37
NR SUBCONTRACTORS CERTIFIED (RJC, LBMA, etc...)	13
NR SUBCONTRACTORS CERTIFIED RJC CoC	9
NR SUBCONTRACTORS FOR CoC MATERIALS	24
NR AUDIT TO SUBCONTRACTORS FOR CoC MATERIALS	14
NR OF LOW RISK LEVEL SUPPLIERS AND SUBCONTRACTORS	32
NR OF MEDIUM RISK LEVEL SUPPLIERS AND SUBCONTRACTORS	11
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

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

- *Subcontractor commitment IF001*
- *Supplier qualification questionnaire MDE 03-A* for supplier and subcontractors
- *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 *Integrated ethics Policy, Environmental Policy, Health & Safety Policy*.

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.

In the reporting period, the following quantities of precious metals, diamonds and colored gems entered the company

TOTAL GOLD PURCHASED	38kg
CoC GOLD PURCHASED	38kg
TOTAL SILVER PURCHASED	375kg
CoC SILVER PURCHASED	375kg
TOTAL GOLD RECEIVED FROM CUSTOMERS	39,6kg
CoC GOLD RECEIVED FROMCUSTOMERS	39,2kg
TOTAL SILVER RECEIVED FROM CUSTOMERS	0kg
CoC SILVER RECEIVED FROMCUSTOMERS	0kg

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 the assessment of our own and our supplier's due diligence practices relating to human rights, we identified potential and actual risks within our supply chain.

We have analyzed risks in our "Risk analysis" file regarding the following areas:

- Child labor
- Forced and compulsory labor
- Health and safety
- Freedom of association and the right to collective bargaining
- Discrimination
- Disciplinary practices
- Working hours
- Remuneration

28 risks are **LOW** level

1 risk is **MEDIUM** level (Identified as MEDIUM the risk of flames in the melting area)

Other RJC risks have been analysed:

- Identification and traceability
- Procurement
- Bribery and facilitating payments
- Business partners

- Money laundering and terrorist financing
- Security

40 total risks, 40 risks are **LOW** level

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 file “*Risk analysis*” as described in our *RJC COP Manual*. Our risk analysis matrix 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

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

- Immediately suspend or stop purchasing from the suppliers involved. Mitigate where possible.
- Immediately suspend or discontinue purchasing from affected suppliers. Mitigate where possible.
- Continue or temporarily suspend trade with suppliers but implement measurable mitigation actions. Suspend or discontinue if mitigation measures are ineffective.

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** regarding human rights or our supply chain

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 against the RJC COP 2019 took place on December 2024 and the next will be in the 2027. The third-party RJC audit against the RJC CoC 2017 will take place on February 2025.