

REPORTING REQUIREMENTS FOR COPs 6 & 7

**ITALRECYCLING &
INVESTMENT SRL**

COP 6 & 7: HUMAN RIGHTS & DUE DILIGENCE

Contact Information

COMPANY NAME: **ITALRECYCLING & INVESTMENT SRL**
DATE: **28/10/2024**
REPORTING PERIOD: **06/07/2023-28/10/2024**
CONTACT: **ambiente@italrecycling.com**

COMPANY MANAGEMENT SYSTEMS

Italrecycling & investment srl have the following policies in place (https://italrecycling.it/wp-content/uploads/2023/04/POL.RJC_.001_Politica-RJC.pdf), detailing our commitment to respect human rights throughout our supply chain and our supply chain due diligence on the following minerals (gold, silver, platinum group metals) originating from conflict-affected and high-risk areas. Italrecycling & Investment srl endorse these policies to our suppliers and stakeholders by distributing them via e-mail, these policies can also be accessed by our internal stakeholders via company bulletin board and externally via website.

To support supply chain due diligence, we have implemented the following internal measures: checking suppliers' business registrations, conducting proper due diligence, and verifying the financial health of the supplier. The senior manager responsible for overseeing supply chain due diligence is Riccardo Albertoni. To aid us in identifying our human rights impacts we have developed and implemented the follow systems [give details]; we have the following human rights policy in place https://italrecycling.it/wp-content/uploads/2023/04/POL.RJC_.001_Politica-RJC.pdf. The senior manager responsible for overseeing our human rights impacts is the Sole Director, Andrea Albertoni.

Italrecycling & investment srl have established a system of controls and transparency over our supply chain, which include our approach for identifying suppliers verifying the reliability of the company, checking the necessary authorizations to operate, and performing due diligence checks in accordance with company procedures and identifying sources of our raw material and metals. These methods have strengthened our due diligence efforts, also thanks to the use of software dedicated to supply chain monitoring to assess supplier compliance..

As a company we communicate our expectations regarding human rights and supply chain due diligence by sharing our company policy and asking all suppliers to sign the RJC commitment, through which they commit to uphold the company values in accordance with RJC standards. In addition to this, we also maintain continuous and long-lasting relationships with our suppliers, creating a stable collaboration based on mutual knowledge and trust.

Our grievance mechanism for internal stakeholders can be accessed via complaint drop box, our external grievance mechanism is available via web site by completing the dedicated complaint form. No grievances were received during the reporting period in question. The employee responsible for these grievance mechanism is Danila Babbini company's Management Systems Officer.

IDENTIFIED & ASSESSED RISKS

We assess our own and supplier's due diligence practices and those relating to human rights by applying the corporate code of ethics and sharing it with all our clients and suppliers.

During our assessment of our own and our supplier's due diligence practices and those relating to human rights, we have not identified actual risk within pur supply chain.

STRATEGY

Our risk assessment findings are received by Managing Director and Corporate Ethics Committee.

To respond to the risks identified within our supply chain, we took the following steps to design and implement a risk management plan. Our risk management plan consists of analyzing, for each risk, the causes and effects of the risk under consideration, taking them into account in every business process (procurement, security, COC traceability, etc.). Through the risk analysis implemented, the current state of the company is identified, along with points for improvement that can be implemented to reduce risk levels.

To implement our risk management plan we have taken the following risk mitigation steps: for the security risk we apply adequate verification procedure and carry on transport via armored courier, for corruption risk the Company discloses the programmatic policy and posts the anti-corruption procedure on bulletin boards and publishes it on the website. Additionally, constant monitoring is carried out by the RJC committee. Regarding environmental risk, the company has implemented and actively maintains a management system in accordance with the ISO 14001 standard.

Italrecycling & Investment Srl provided the training regarding human rights to our employees on 29/10/2024; this training included information on company procedures for supply chain monitoring, supplier verification, and operations implemented within the company to ensure metal traceability. We have also provided training regarding our due diligence activities to all of our employees involved in supplier management and metal procurement on 17/04/2024; this training included information on anti-money laundering regulations and the correct operational procedures for the buying and selling of metals. This type of training is updated at least annually for the involved staff.

Italrecycling & Investment Srl communicate to our stakeholders regarding our due diligence activities and efforts to prevent human rights risks. This communication occurs through the publication of the annual report on the company website. When a human rights risk is identified we communicate the risk and how we are addressing it to potentially affected stakeholders through formal communications and request evidence of its treatment.

Since our last report no grievances have been raised regarding human rights risks or our supply chain due diligence.

CARRY OUT A THIRD PARTY AUDIT (OPTIONAL INFORMATION)

Italrecycling & Investment Srl has joined the RJC in 2023 and has since achieved 1/3 year certifications.

In support of our continuous improvement journey, our latest third-party RJC audit took place within our organisation against the RJC COP 2019 on 13-14/02/2023.