

Italpreziosi Spa

Disclosure Report

Date Submitted: February 8th, 2024

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Disclosure Materials

Certified B Corporations must complete a Disclosure Questionnaire to identify potentially sensitive issues related to the company (e.g. historical fines, sanctions, material litigation, or sensitive industry practices).

This component does not affect the company's score on the B Impact Assessment. If the company answers affirmatively to any items in the Disclosure Questionnaire that B Lab deems relevant for public stakeholders, then, as a condition of their certification, the company must:

- Be transparent about details of the disclosure issues identified on the company's public B Impact Report
- 2) Describe how the company has addressed this issue
- 3) Demonstrate that management practices are in place to avoid similar issues from arising in the future, when necessary.

In all cases, the Standards Advisory council reserves the right to refuse certification if the company is ultimately deemed not to uphold the spirit and integrity of the community.

In addition to the voluntary indication of sensitive issues in the Disclosure Questionnaire, companies pursuing Certification also are subject to a background check by B Lab staff. Background checks include a review of public records, news sources, and search engines for company names, brands, executives/founders, and other relevant topics.

Sensitive issues identified through background checks may or may not be within the scope of questions in the Disclosure Questionnaire, but undergo the same review process and are subject to the same possible review by the Standards Advisory Council, including ineligibility for B Corp Certification, required remediation, or disclosure.

This document contains a copy of the company's completed Disclosure Questionnaire and related disclosure documentation provided by the company



Disclosure Questionnaire

Industries and Products

Yes No Please indicate if the company is involved in production of or trade in any of the following. Select Yes for all options that **Animal Products or Services** $\boxed{}$ **Biodiversity Impacts** Chemicals \square **Disclosure Alcohol Disclosure Firearms Weapons** $\boxed{}$ **Disclosure Mining** $\boxed{}$ **Disclosure Pornography** $\boxed{}$ **Disclosure Tobacco** $\boxed{}$ **Energy and Emissions Intensive** $\overline{\mathbf{A}}$ <u>Industries</u> Fossil fuels \square Gambling **Genetically Modified Organisms** $\boxed{}$ Illegal Products or Subject to $\boxed{}$ **Phase Out** Industries at Risk of Human \square Rights Violations **Monoculture Agriculture** \square **Nuclear Power or Hazardous** \square **Materials** Payday, Short Term, or High **Interest Lending** Water Intensive Industries $\overline{\mathbf{A}}$ **Tax Advisory Services**

Outcomes & Penalties

	Yes	No	
Please indicate if the company has had any formal complaint to a regulatory agency or been assessed any fine or sanction in the past five years for any of the following practices or policies. Check all that apply.			
Anti-Competitive Behavior		\checkmark	
Breaches of Confidential Information		N	
Bribery, Fraud, or Corruption		V	
Company has filed for bankruptcy		\triangleright	
Consumer Protection		V	
Financial Reporting, Taxes, Investments, or Loans		\searrow	
Hazardous Discharges Into Air/Land/Water (Past 5 Yrs)		\searrow	
Labor Issues			
Large Scale Land Conversion, Acquisition, or Relocation		\searrow	
Litigation or Arbitration		\checkmark	
On-Site Fatality		\checkmark	
Penalties Assessed For Environmental Issues		V	
Political Contributions or International Affairs		Y	
Recalls		V	
Significant Layoffs		V	
Violation of Indigenous Peoples Rights		V	
Other		\checkmark	



Practices

	Yes	No
Please indicate if the following statements are true regarding whether or not the company engages in the following practices. Check all that apply. If the statement is true, select "Yes." If false, select "No."		
Animal Testing		K
Company/Suppliers Employ Under Age 15 (Or Other ILO Minimum Age)		V
Company prohibits freedom of association/collective bargaining		\searrow
Company workers are prisoners		\triangleright
Conduct Business in Conflict Zones		\checkmark
Confirmation of Right to Work		V
Does not transparently report corporate financials to government		\searrow
Employs Individuals on Zero-Hour Contracts		K
Facilities located in sensitive ecosystems		N
ID Cards Withheld or Penalties for Resignation		\
No formal Registration Under Domestic Regulations		V
No signed employment contracts for all workers		V
Overtime For Hourly Workers Is Compulsory		V
Payslips not provided to show wage calculation and deductions		V

	Yes	No
Sale of Data		₩
Tax Reduction Through Corporate Shells		✓
Workers cannot leave site during non-working hours		\checkmark
Workers not Provided Clean Drinking Water or Toilets		\vee
Workers paid below minimum wage		V
Workers Under Bond		\checkmark
Other		\checkmark

Supply Chain Disclosures

	Yes	No
Please indicate if any of the following statements are true regarding your company's significant suppliers.		
Business in Conflict Zones		\checkmark
Child or Forced Labor		\vee
Negative Environmental Impact		\checkmark
Negative Social Impact		\checkmark
Other		\checkmark



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Energy and Emissions Intensive industry

Italpreziosi Spa is involved in the production/sale of products, or is part of an industry that can potentially be classified as energy and emission-intensive, meaning that they are more likely to have significant impacts on the environment based on their carbon emissions associated with their operations and their contribution to climate change. Certified B Corps are required to make transparent their involvement in such activities or industries.

Any party aware of specific company practices that have had a negative impact related to their involvement in the sensitive industry, and which may constitute a violation of the B Corp standards, may contact us via our <u>public complaints procedure</u>.

For more information about the company's practices, please visit the company's webpage/sustainability report, accessible here.



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Water Intensive industry

Italpreziosi Spa is involved in the production/sale of products, or is part of an industry that can potentially be classified as water intensive, meaning that they are more likely to have significant impacts on the environment, such as water stress or depletion of local water sources if water use is not appropriately managed. Certified B Corps are required to make transparent their involvement in such activities or industries.

Any party aware of specific company practices that have had a negative impact related to its involvement in these or other controversial industries, and which may constitute a violation of the B Corp standards, may contact us via our <u>public complaints procedure</u>.

For more information about the company's practices, please visit the company's webpage/sustainability report, accessible here.



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Industries at Risk of Human Rights Violations

Торіс	Precious Metals
Summary of Issue	Italpreziosi operates in the production, refining and trading of precious metals, production and trade of investment gold. The company represents the strategic partner for all operators in the precious metal business, offering complete solutions for mines, banks, jewelry manufacturers, and industrial and private consumers.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	100% of the precious metals (gold and silver) that Italpreziosi sources and uses as input materials are traceable and the traceability system is certified by the Responsible Jewellery Council - Chains of Custody and Code of Practice, and the LBMA (independent precious metals authority). LBMA and RJC's standards enable companies to integrate responsible business practices into their management systems and daily operations, in particular commitments to responsible sourcing standards and respect for Human Rights.
	Since the beginning of 2022 Italpreziosi has been a Fairmined Authorised Supplier, accreditation which enables its customers the possibility of contributing to the socio-economic and environmental development of small mining communities by choosing to purchase Fairmined certified gold. In particular, the Fairmined standard certifies respect for the rights and working conditions of miners, environmental protection, and monitors gender equality between men, women and child labor. Italpreziosi is an RMI member and certified refinery (RMI Active and Conformant Facilities List), which ensures the following standards aligned with regulatory requirements and best
	practices. In the FY 2022, 100% of the company's revenue was earned
	from the sale of precious metals and related services.
Impact on Stakeholders	The sourcing of precious metals poses potential risks such as human rights violations, armed conflict and money laundering, as these minerals could potentially come from areas of conflict and exploitation. Child labour and exploitation could be another potential common risk related to sourcing precious metals.



Implemented Italpreziosi conducts strict internal due diligence procedures to ensure continuous control of the precious metals supply chain. **Management Practices** In addition to following the main international and national regulations (eg., the EU Conflict Minerals Regulation). Italpreziosi adheres to voluntary standards, such as: the Chain of Custody (CoC) and Code of Practice (CoP) of the Responsible Jewellery Council (RJC), the Responsible Guidances for Precious Metals of the London Bullion Market Association (LBMA), the Due Diligence Guidance for Responsible Supply Chain of Minerals from Conflict Affected and High Risk Areas of the OECD, The World Gold Council "Conflict-free Gold Standard", and the CRAFT Code of Alliance for Responsible Mining (ARM). In the Know Your Counterpart (KYC) on-boarding procedures, the Compliance Department asks and analyses all information regarding the supply chain. following the standards they are committed to, also conducting on-site visits when necessary to suppliers to ensure the accuracy of the information received. Italpreziosi also produces an annual Index of High Risk Countries, based on various criteria, such as: Governance, Security, AntiMoney Laundering, Corruption, Environment and Human Rights. The sources used are always international organizations, private compliance firms, government databases and regulations, and NGO reports. In 2022, in addition to a qualitative approach, the company adopted a quantitative approach with numerical measurement of risk and rankings for each criterion developed. To support their due diligence process, Italpreziosi also have External Risk Intelligence Databases analysing counterparties' risk, such as Worldcheck by Refinitiv, Dun & Bradstreet and Telemaco (for Italian counterparts). Sustainability report: Certifications: Supply chain policy & Code Report of ethics **Other Management** Fair working conditions, the prohibition of child labor, gender equality, respect for human rights, the safeguard of the **Comments** environment and the fight against climate change are the fundamental basis of our due diligence processes, expressed in our policies. Our policies represent such fundamental documents for every commercial relationship that we ask each of our counterparties to sign them, so that they are committed to our same values of respect for environment and human rights.