

Complaint and whistleblowing policy

1) Introduction and Purpose

Italpreziosi spa is committed to maintaining the highest standards in terms of conduct, integrity and ethical behaviour, as summarised in the Code of Ethics and other company policies.

The purpose of this Policy is to create a mechanism that allows any stakeholder, internal or external to the company, to submit a report of unlawful conduct that may constitute a breach of European laws and regulations, values and principles enshrined in the Code of Ethics and/or that may cause damage of any kind to the company, customers, shareholders, partners, third parties and, more generally, to the community and/or public administration, of which they have become aware in the context of their work.

Without prejudice to the foregoing, this Policy must be interpreted and, where necessary, supplemented, in the light of the provisions of Legislative Decree 24/2023 and of the legislation referred to therein.

The purpose of this Whistleblowing Policy is to regulate the process of receipt, analysis and treatment of Whistleblowing Reports, from whomever sent or transmitted, and applies to collective and individual complaints or grievances relating to any Italpreziosi SPA activity.

This policy applies to all the persons indicated in Article 3 of Legislative Decree no. 24/2023 and therefore, by way of example, to employees, self-employed workers who have relations with the company, holders of collaboration relationships, suppliers of goods or services of the company, freelance professionals and consultants, trainees, and all those who perform functions of administration, management, control, supervision and representation of the company.

The aim of the policy is to encourage, by providing the protections envisaged by Legislative Decree 24/2023, reports of violations of law and regulations and, more generally, of conduct or risks detrimental to the interests of the company, the community, and, more generally, all stakeholders. To this end, it is specified that the violations that are the subject of potential reports consist of conduct, acts, or omissions, which harm the above-mentioned interests and consist of all the administrative, accounting, civil and criminal offences detailed in Article 2 of Legislative Decree no. 24/2023, as well as all the unlawful conduct relevant under Legislative Decree no. 231/2001. By way of example and without limitation, therefore, the breaches relevant for the purposes of this policy include, but are not limited to, those relating to:

- health, safety, working conditions;
- human rights violations;
- trade, mining, export, transport of precious metals;
- environmental protection, impacts and risks;
- compliance and legal affairs;
- financing of terrorism and money laundering;
- Fraud, corruption and other money laundering;
- Tax offences.

The company provides information on the channel, procedures and prerequisites for internal and external reporting both on the Digital Bulletin Board and on its website.

It should also be noted that, in the cases provided for in Article 6 of Legislative Decree No. 24/2023, the reporting party may report through the so-called external reporting channel referred to in Article 7 of that decree, to the National Anti-Corruption Authority.

2) Sources

Our reference sources for this Policy are both internal to the company, e.g. Code of Ethics, Supply Chain Policy, and external, such as OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Areas, Supplement on Gold; - LBMA Responsible Gold Guidance; - UN Guiding Principles on Business and Human Rights - Responsible Jewellery Council Code of Practices and Chain of Custody; - The World Gold Council Conflict Free Gold Standard, L.179 /2017, EU Directive 2019/1937 (Protection of persons reporting breaches of EU law), Legislative Decree 24/2023, Regulation 2016/679 - GDPR.

3) Complaint / Whistleblowing procedure

Pursuant to Article 4 of Legislative Decree 24/2023, the company has set up its own internal office dedicated to the management of reporting procedures, the Compliance Office.

The company has set up special internal reporting channels through which it can guarantee the confidentiality of the identity of the person making the report, the person involved and the person mentioned in the report, as well as the content of the report and the relevant supporting documentation.

Such channels include:

- a) dedicated email: reclami@italpreziosi.it
- b) telephone line: 0575 383041 (requesting the Compliance Office)
- c) letter to the address: Strada A n. 32, Località San Zeno, 52100, AR, Italia – To: Compliance Office
- d) or in the person of the Compliance Officer (address: Strada A n. 32, Località San Zeno, 52100, AR, Italia)

The Compliance Officer is responsible for monitoring incoming reports and keeping the Due Diligence Commission informed of relevant risks.

As part of the handling of internal reports, the appointee is obliged to perform certain activities, including issuing the reporting person with an acknowledgement of receipt of the report within seven days from the date of receipt; maintaining contact with the reporting person (and requesting additions from the latter, if necessary); diligently following up reports received; and providing feedback on the report within three months from the date of the acknowledgement of receipt or, in the absence of such notice, within three months from the expiry of the seven-day period from the submission of the report.

Moreover, in the event that the report is made orally, the compliance officer shall, with the consent of the reporting party, ensure that the report is recorded in minutes and that all appropriate precautions are taken to ensure that such minutes are not accessible.

A minimum level of information is required, such as the name of the person or entity concerned, description of the facts, date, time period, locations.

After the complaint will be assessed whether it is in line with the purpose of this Policy, considering the type of information and evidence provided. If the information and evidence provided is sufficient, Italtrepreziosi Spa will open an investigation: the members of the Compliance department supported by RSG will record on a special electronic document (NC Register) the report, the analysis of the causes, any corrective action taken and the effectiveness of the same assessed over time. Non-anonymous reporting persons will be informed about the outcome of the investigation. Information and investigations will be treated confidentially in accordance with applicable privacy regulations.

4) Confidentiality and protections

Reports will not be used beyond what is necessary to adequately follow them up. The identity of the person making the report and any other information from which such identity may be inferred, directly or indirectly, will not be disclosed, without the express consent of the person making the report, to persons other than those expressly authorised to receive or follow up the reports.

Reporting entities and persons shall be guaranteed the right not to suffer any retaliation and therefore, without prejudice to what is established in this respect by Article 17 of Law Decree 24/2023, they shall not suffer, by way of example, any of the following a) dismissal, suspension of employment or measures having equivalent effect; b) downgrading or non-promotion; c) change of duties, place of work, reduction of salary, change of working hours; d) suspension from training or restrictions on access thereto; e) adoption of disciplinary measures or other sanctions of a pecuniary nature; etc.

5) Processing of personal data

Any processing of personal data will be carried out in accordance with Regulation (EU) 2016/679, Legislative Decree No 196 of 30 June 2003 and Legislative Decree No 51 of 18 May 2018.

Personal data that are manifestly not useful for the processing of a specific report shall not be collected or, if accidentally collected, will be deleted immediately.

6) Retention of documentation

Internal reports and related documentation are kept for as long as necessary to process the report and in any case no longer than five years from the date of the communication of the final outcome of the reporting procedure, subject to confidentiality obligations.

If an unrecorded telephone line is used for reporting, the report shall be documented in writing by means of a detailed transcript of the conversation by the staff member in charge. In this case, the whistleblower is entitled to verify, rectify and confirm the content of the transcript by signing it.

Where, at the request of the person making the report, the report is made orally in the course of a meeting with the Compliance Officer, it is, with the consent of the person making the report, documented by the Compliance Officer either by means of a recording on a device suitable for storage and listening or by means of minutes. In the case of minutes, the reporting person may verify, correct and confirm the minutes of the meeting by signing them.

7) Conditions for the protection of the reporting subject

Without prejudice to the application of the protection measures provided for by Legislative Decree no. Without prejudice to the application of the protection measures provided for by Legislative Decree no. 24/2023 to the reporting person, it should be noted that where the reporting person is convicted, even by a judgment of first instance, i.e. not final, for the offences of defamation or slander, or subject to conviction, in civil proceedings, for the same acts of defamation or slander in cases of wilful misconduct or gross negligence, the reporting person is liable to a disciplinary sanction commensurate with the act committed, and the protection measures governed by Legislative Decree no. 24/2023 will not be guaranteed. Below, the specification of the disciplinary sanctions provided for such cases is set out in the model pursuant to Legislative Decree no. 231/2001 adopted by Italtreziiosi.