

Contact Information

COMPANY NAME: **QUADRIFOGLIO spa**
DATE: **31/01/2024**
REPORTING PERIOD: **01/01/2023 – 31/12/2023**
CONTACT: **gabriele@quadrifogliospa.it**

COMPANY MANAGEMENT SYSTEMS

QUADRIFOGLIO spa have the following policies in place:

- *Programmatic Policy RJC rev4 updated on 31/01/2024*
- *Anti-corruption Code rev2 updated on 04/08/2021*
- *Disciplinary Code rev2 updated on 07/06/2022*
- *Code of Ethics rev1 updated on 04/08/2021*

Policies 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. **Quadrifoglio S.p.a.** endorse these policies to our suppliers and stakeholders by distributing them via website link <https://www.quadrifogliospa.com/chi-siamo/certificazioni-e-premi/> 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 <https://www.quadrifogliospa.com/chi-siamo/certificazioni-e-premi/>

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

- *Suppliers Risk Assessment*
- *Supply chain Policy (inside the Programmatic Policy RJC)*
- *Supply chain procedure (inside the RJC Manual)*
- *Annual Review*

The senior manager responsible for overseeing supply chain due diligence is *Gabriele Parri* as *RJC Responsible*.

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

- *Human Rights Due Diligence*

we have the following human rights policy in place, *Programmatic Policy RJC* and *Code of Ethics*. The senior manager responsible for overseeing our human rights impacts is *Gabriele Parri* as *RJC Responsible*.

Quadrifoglio S.p.a. 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 *Programmatic Policy RJC* and *Code of Ethics* 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 near to the employee entrance, our external grievance mechanism is available via **website** <https://www.quadrifogliospa.com/> Till today no grievances have been received. The employee responsible for these grievance mechanisms is *Gabriele Parri* as *RJC Responsible*.

IDENTIFIED & ASSESSED RISKS

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

- *Human Rights Due Diligence*
- *Suppliers 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 *Gabriele Parri* as *RJC Responsible*.

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

Quadrifoglio S.p.a. provided the training regarding human rights to our employees on *28/07/2022*; 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
- Corporate Policy
- Social and Human Rights
- Commercial, Anti-Corruption, Anti-Bribery and Anti-Money Laundering Policy
- Security



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Quadrifoglio S.p.a. 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.quadrifogliospa.com/chi-siamo/certificazioni-e-premi/>. 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)

Quadrifoglio S.p.a. has joined the RJC in 2018 and reach the certification COP in September 2018 for the first time and the certification CoC in February 2022.

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