

# Cormas Spa



Prepared according to UN AGENDA 2030 PRINCIPLES, GRI INDICES

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# 1. GENERAL INFORMATION

## 1.1 DESCRIPTION

The Sustainability Report and Review is a public disclosure about the social and environmental impact of the activities of CORMAS SPA. Published annually, the report summarises the actions already taken by the Company, sets out its future plans and indicates the values, situation and objectives of CORMAS SPA in the field of social and ethical relations.

Prepared by Company Management in collaboration with the other members of the Sustainability Team, the Report is drawn up in accordance with the UN 2030 Agenda and the indicators of the Global Reporting Initiative (GRI), which are used as a guideline to systematically address these aspects.

The report includes the Sustainability Policy and Management Review, the aim of which is to define, verify, correct and improve the Company's commitment to sustainability.

The Sustainability Report and Review has a dual purpose:

- as a management tool, it enables Management to measure and continuously improve its Social Responsibility and Sustainability Policy along with the other policies and procedures adopted in this area,
- as a means of communication, it keeps people updated and gathers information from stakeholders who can then have a say in how the company is run. This report is available to all company personnel on the intranet, and to all external stakeholders on the website [www.cormasspa.it](http://www.cormasspa.it)

## 1.2 RECIPIENTS

The Sustainability Report and Review is addressed to anyone who has significant relations with CORMAS SPA, in particular:

- ✓ COMPANY PERSONNEL;
- ✓ CONTRACTORS;
- ✓ CUSTOMERS;
- ✓ PARTNERS;
- ✓ LOCAL COMMUNITIES;
- ✓ SUPPLIERS;
- ✓ SUBCONTRACTORS;
- ✓ TRADE UNIONS.



The Company asks all these recipients to participate directly or indirectly in this shared commitment to safeguarding the environment and to protecting basic human rights.

## 1.3 OBJECTIVES

The objective of the Sustainability Report and Review is to provide a clear summary of the actions taken by CORMAS SPA, and to give stakeholders a clear, transparent statement of the results obtained in the area of social responsibility and sustainability.



Specifically, the aim of the Sustainability Report and Review is to:

- 01 Evaluate the Company's ethical values, social commitments, principles and benchmarks, with a view to continuous improvement.
- 02 Provide information about the social
- 03 Encourage dialogue, engagement and consensus among stakeholders.
- 04 Fully implement the Sustainability System (also through certification)



### 1.4 REGULATORY ASPECTS

Our organisation is required to comply with all local, national and other applicable laws, the main sector-specific regulations and other rules adopted by the Company, as well as with this Standard. Where the laws, regulations and other rules adopted by the Company cover the same topics, the requirement that is most favourable to workers will be applied. The organisation is also required to comply with the following international standards:

- RJC COP 2019 and RJC COC 2017
- Italian Consolidation Act No. 81/2008 Health and Safety in the workplace
- European Regulation 679/2016 (GDPR)
- National collective agreement (CCNL) for the goldsmith sector
- Workers' Statute: Italian Law 300/1970
- "Dignity Decree" (Decree Law 87/2018)
- Law 68/99 hiring of protected categories
- Legislative Decree 66/2003 on the organisation of working hours
- Guidelines on the structuring of organisational and control models (Legislative Decree 231)
- Legislative Decree No. 152/2006
- ILO Convention 01 (Hours of Work -Industry) and Recommendation 116 (Reduction of Hours of Work)
- ILO Convention 29 (Forced labour) and 105 (Abolition of forced labour)
- ILO Convention 87 (Freedom of Association and Protection of the Right to Organise)
- ILO Convention 98 ( Right to Organise and Collective Bargaining)
- ILO Convention 100 (Equal Remuneration) and (Discrimination - Employment and Occupation)
- ILO Convention 102 (Social Security - Minimum Standards)
- ILO Convention 131 (Minimum Wage Fixing)
- ILO Convention 135 (Workers' Representatives)
- ILO Convention 138 and Recommendation 146 (Minimum age)
- ILO Convention 155 and Recommendation 164 (Occupational Safety and Health)
- ILO Convention 159 (Vocational Rehabilitation and Employment - Disabled Persons)
- ILO Convention 169 (Indigenous and Tribal Peoples)
- ILO Convention 177 (Home work)
- ILO Convention 181 (Private Employment Agencies)
- ILO Convention 182 (Worst Forms of Child Labour)
- ILO Convention 183 (Maternity Protection)
- The ILO Code of Practice on HIV/AIDS and the World of Work
- Universal Declaration of Human Rights
- International Covenant on Economic, Social and Cultural Rights
- International Covenant on Civil and Political Rights
- United Nations Convention on the Rights of the Child
- United Nations Convention on the Elimination of All Forms of Discrimination against Women
- United Nations Convention on the Elimination of All Forms of Racial Discrimination
- United Nations Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises
- UNI/PdR 125:2022 on Gender Equality
- D.L.G. 176 of 29/07/2022 "Transparency Decree"
- ISO 30415 - Diversity & Inclusion
- "Transparency Decree" (Legislative Decree No. 104 of 27/06/2022)

## 2. PROFILE OF CORMAS SPA

Cormas SpA is a precious metals bank, which has traded in Creazzo (province of Vicenza) since 1985. The Company deals with the recovery, processing and refinement of precious metals and the trading of gold, silver, platinum and palladium on a local, national and international scale. Cormas was established in 1985 and since that time has assisted the goldsmith industry by recovering and refining precious metals derived from industrial processes and recovering primary materials from finished products, scrap metal or byproducts.



### CORMAS PRODUCTS and APPLICABLE LAWS AND REGULATIONS

The Company works with the following metals:

- gold
- silver
- platinoids

in the form of ingots, sheets and grains, using the fire assay process to determine the concentration. CORMAS complies with all the applicable sector regulations, including anti-money-laundering legislation, the mandatory FIU requirement to disclose all transactions above a certain value, Italian health and safety legislation (Consolidation Act 81/2008), the GDPR (Regulation (EU) 679/2016), regulations on the use of chemicals (Reach 1907/2016), the Italian Environment Consolidation Act 152/2016, and all laws applicable to workers' rights.

### THE MARKET

CORMAS operates on the local, national and international market. By working alongside producers, gold buyers and other industrial and commercial partners, we can quickly complete the required refining process within just a few hours.

## COMPETITORS

Our competitors are other local companies that also have the capacity to provide a refining service. Cormas has been working in the goldsmith industry for many years, and has built up a loyal clientele over time. Our customer base is now international. Cormas SpA covers both the long-established jewellery manufacturing districts in Italy and also has customers in some of the world's main centres for precious metals.

## SUPPLIERS

Some CORMAS suppliers are also customers. A number of the companies that supply the materials we work with are also our customers, who buy the pure material from us. Other suppliers include companies that trade in raw materials or supply goods used in our production or for services related to the business of Cormas SpA.

## EMPLOYEES

The Cormas workforce includes operatives working on the factory floor, and personnel employed in administrative and sales roles. All personnel are trained or supervised in their specific duties. The aim is to ensure that all staff members are competent for their particular role. Cormas aims to build employee relations based on mutual trust so that all members of staff are aware of their roles and the importance of each individual to the company's success.

## CORMAS FACTORIES: FLOOR AREA AND DEPARTMENTS

The Company is based at a factory located at Via F.Filzi 46, Creazzo, in the province of Vicenza. The factory has a floor space of approximately 1000 m<sup>2</sup>.

## INFRASTRUCTURE MACHINERY AND EQUIPMENT

Cormas is equipped with refining systems and furnaces to melt and produce the ingots. Next to the production area is the lab, where the metal titration takes place.

The administration team works in a small building next to the factory.



#### **INNOVATION**

CORMAS SPA is constantly seeking new solutions in harmony with the principles of sustainability. Encouraging the circular economy by using recycled materials, reducing waste and respecting the environment and human beings are the cornerstones of our plans for the future.

#### **TEAM**

The purpose of our team is to work hard to satisfy all our customers.

The essence of success is working for the common good. We see our company as a community of people, working together to ensure the well-being of all.

CORMAS SPA is a group of people with a shared vision of sustainability and social responsibility.



2.2 ORGANISATIONAL STRUCTURE AND RESPONSIBILITIES

The Company’s management system includes teams and committees whose task is to monitor in-house processes, improve sustainability and take prompt action where necessary, while supporting and encouraging the organisation in its application of ethical principles.



2.3 SUSTAINABILITY TEAM

Our sustainability team comprises representatives of Management and of the workforce. The main responsibilities of the Sustainability System can be summarised as follows:

Our sustainability team comprises representatives of Management and of the workforce. The main responsibilities of the Sustainability System can be summarised as follows:

SUSTAINABILITY SYSTEM LEAD

- Responsible for compliance with sustainability standards and principles
- Prepares and approves the Company Policy
- Oversees the management review, in order to verify the adequacy and efficacy of the System Policy in terms of defining the required improvement actions
- Approves the Sustainability Report and Review
- Implements and monitors the Sustainability System, in collaboration with the other ST members
- Prepares the Sustainability Report and Review, in collaboration with the ST members and other interested parties.



SUSTAINABILITY TEAM

- Works alongside Senior Management to ensure the correct application of the Sustainability System
- Promotes communication between the workforce and Management, as it includes workers’ representatives, giving staff a direct say
- Identifies and assesses risks, giving priority to those areas that pose the greatest risk of non-conformity with the sustainability standard
- Carries out workplace oversight, in order to monitor:
  - a) compliance with sustainability standards and codes of ethics
  - b) implementation of the actions planned to address the risks identified by the sustainability team
  - c) the efficacy of the procedures adopted to fulfil the organisation’s policies and the requirements of the Standard
- Contributes to preparing the Sustainability Report and Review
- Ensures the implementation of steps taken to resolve non-conformities and to implement corrective and preventive actions
- Contributes to preparing the training plan
- Responsible for relations with the certification body
- Responsible for relations with stakeholders.



## 2.4 SUSTAINABILITY POLICY

CORMAS SPA has chosen to develop and apply a Sustainability System aligned with the principles of the UN 2030 Agenda, the RJC COC and COP standards and the GRI indicators.

To this end, the Company is committed to adopting and conforming with:

- all the requirements of the RJC COC and COP standards
- the Conventions of the International Labour Organisation (ILO)
- the United Nations Convention on the rights of the child
- the Universal Declaration of Human Rights
- the United Nations Convention on the elimination of all forms of discrimination against women and of all forms of racial discrimination
- the International Covenant on civil and political rights and on economic, social and cultural rights.
- all the applicable national and international laws, including Italian Legislative Decree 81/2008 as amended, related to health and safety in the workplace and the Regulation (EU) No. 679/2016 related to confidentiality and processing of personal data.
- the OECD Guidelines
- the Legislative Decree no. 152/2006, Environmental Consolidation Act

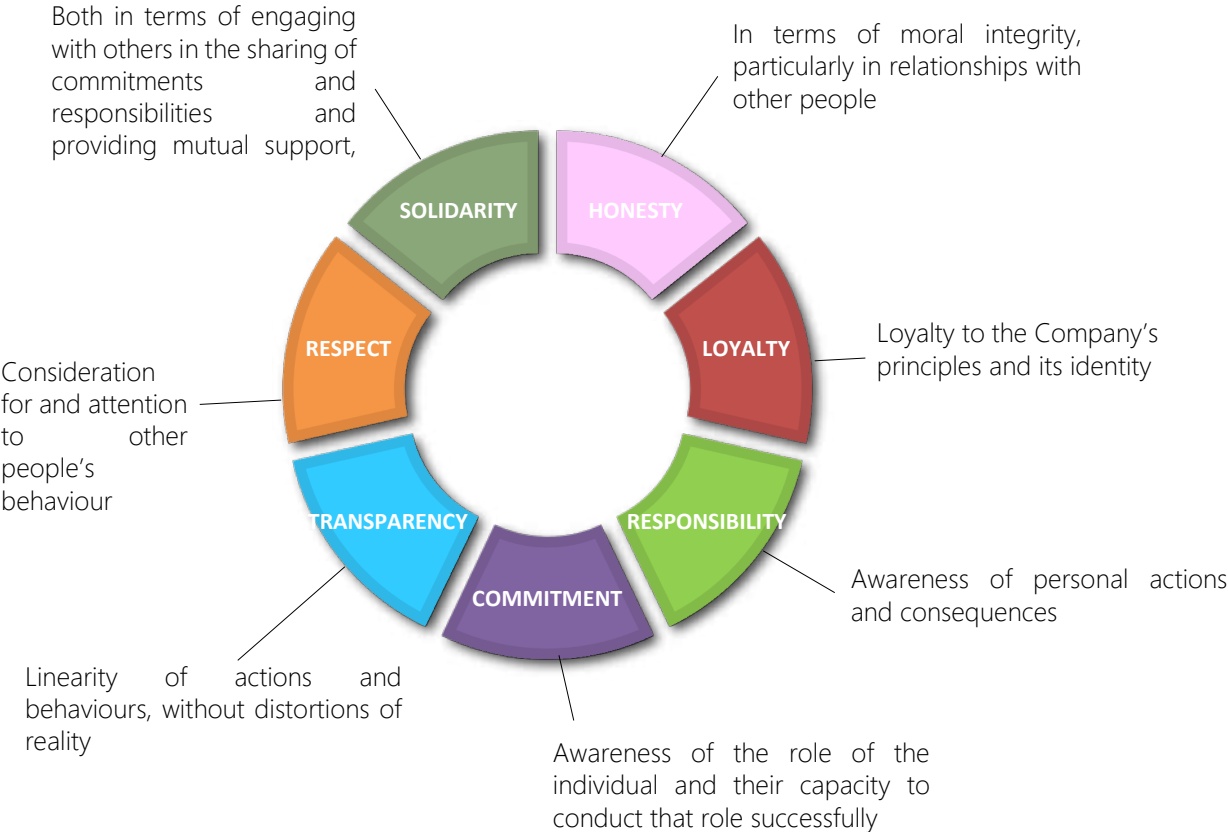
The Company intends to achieve and maintain the following general aims:

- |  |   |
|--|---|
| <ul style="list-style-type: none"> <li>• Preventing situations harmful to the rights of the individual</li> <li>• Raising the efficiency of the Company's organisation and supply chain</li> <li>• Disseminating a culture of social responsibility, through an ongoing process of training, engagement and accountability for all personnel</li> <li>• Streamlining the Company's organisation and procedures, with a clear, balanced definition of duties and responsibilities</li> <li>• Creating a stimulating, gratifying climate within the Company to provide career opportunities for all personnel</li> <li>• Participating in solidarity and social schemes</li> <li>• A commitment to circulating the principles of sustainability among all stakeholders</li> <li>• Helping to develop the circular economy</li> </ul> | <ul style="list-style-type: none"> <li>• The Company is committed to complying with the principles of the Sustainability System. In all its activities, Cormas requires its staff, contractors and suppliers to respect the legal requirements in the following areas:</li> <li>• Child labour</li> <li>• Voluntary employment</li> <li>• health and safety</li> <li>• Freedom of association and the right to collective bargaining</li> <li>• Discrimination</li> <li>• Disciplinary practices</li> <li>• Working hours</li> <li>• Pay</li> <li>• Respect for the environment</li> <li>• Anti-corruption</li> <li>• Legality and the fight against fraud</li> </ul> |
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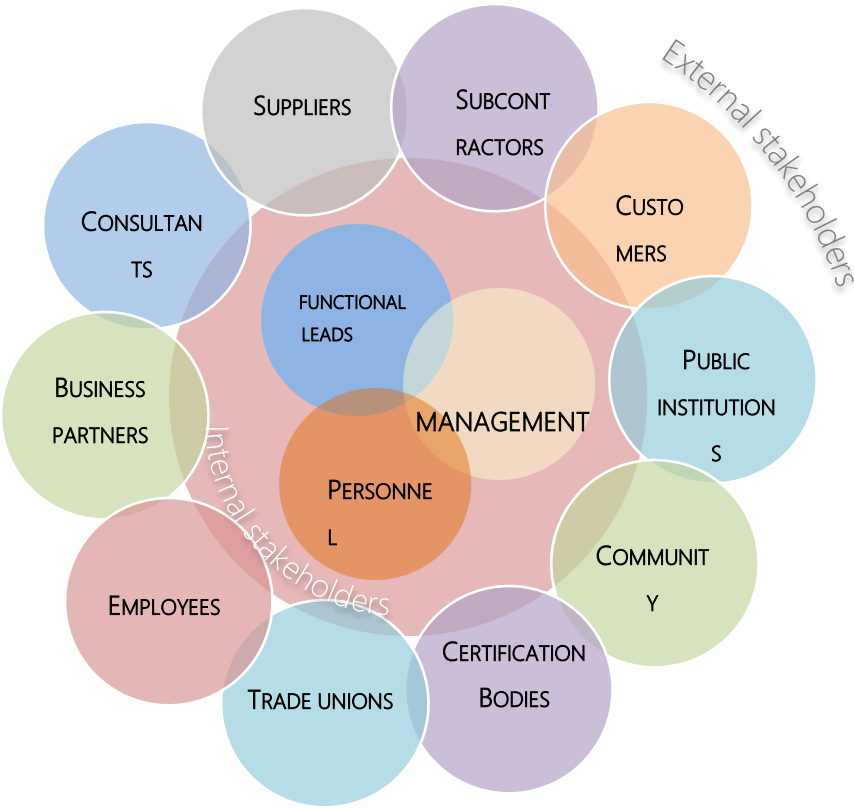
### 2.5 VALUES

CORMAS SPA therefore recognises the fundamental importance of human values:



# 1. STAKEHOLDERS

The parties identified within the social responsibility system of **CORMAS SPA** can be divided into two groups: internal and external stakeholders.



All these groups have different expectations, requirements, needs and interests in their relations with the Company.

In general:  
Among the internal stakeholders, sustainability manifests itself as respect for the rules, engagement and the building of mutual trust within the corporate climate, aimed at ensuring the highest possible protection for employees and contractors. The intention is to develop the skills of each individual to ensure that individual needs and aspirations are met. With regard to external stakeholders, sustainability is expressed in various ways, depending on the roles

that each stakeholder has. This can be summarised as an awareness of interacting with a company that has a declared focus on sustainability, certified by independent bodies and expressed through this Management Review, among other things.

In particular:

**COMPANY MANAGEMENT**

The ethical requirement is to achieve profit and growth for the Company, without compromising

sustainability by failing to respect the resources used in production (both human and environmental), and to produce and create benefit by disseminating the principles that underpin the organisation.

How we achieve this

Cormas seeks to increase profits by identifying the areas of the business which are more focused on sustainability, and by generating the benefits of satisfaction both internally and externally in order to reach its objectives in terms of profit and the gratification of personnel.

## FUNCTIONAL LEADS

The need here is not only to achieve a positive profit margin, but also to participate in projects aimed at protecting and safeguarding people and our planet.

How we achieve this

By supporting projects for the continuous improvement of our Company's sustainability, providing objective reports on results and identifying possible opportunities for growth and evolution, year after year.

## PARTNERS

The need of our partners (for example subcontractors) is to share the principles of sustainability, in order to build trust among stakeholders, supported by a team spirit that allows us to address the challenges of our times.

How we achieve this

By adopting a common sustainability policy; setting common objectives and strategies to safeguard the environment and ensure the correct management of human resources.

## PERSONNEL AND CONTRACTORS

The ethical requirement here is to meet the financial and career needs of our personnel, based on their aptitudes, beliefs, needs and aspirations, in an environment that guarantees respect for worker health and safety.

How we achieve this

By implementing a management system based on the fundamental principles of ethics, ensuring that the socio-economic, health and safety needs of our personnel are all met, based on their attitudes and aspirations, and by continuously raising the efficiency of the methods put in place to achieve our ethical objectives.

## SUPPLIERS

The ethical requirement is to create profit and growth for the Company, without compromising sustainability by failing to respect the human and environmental resources used in production.

How we achieve this

By establishing clear, collaborative relationships in all our activities and building partnerships that respect the rights of our personnel, while working together on improvement actions, identified collectively. Sustainability is achieved through teamwork, and therefore our ethical and environmental principles are shared by all the players in the supply chain.

## CUSTOMERS

The ethical requirement is to satisfy the needs relative to the products or services purchased, without compromising respect for the resources used to make those products and without harming the environment or impairing the Company's image in the community due to being associated with irresponsible or unethical behaviours.

How we achieve this

By meeting our customers' needs based on long-term collaborations and by opening up a channel of communication for feedback and suggestions. By monitoring our customers' sustainability, promoting the principles of sustainability and supporting their adoption.

## COMMUNITY

The ethical requirement is to follow through on our intention to protect, and where possible improve the well-being and image of the community, which comprises both local businesses and the general public.

How we achieve this

By continuing to build a model of sustainable business that lives up to the image of the community in which we continue to grow, inspiring other businesses and the public at large to develop local wealth by creating new jobs.

## TRADE UNION

The ethical requirement is to ensure that principles are in place for the protection and respect of workers, with a real commitment to positioning the workforce as the cornerstone of each company

How we achieve this

By focusing on human resources, understanding their needs and monitoring staff satisfaction. By identifying

actions for improvement aimed at supporting well-being within the company.

## 2. SUSTAINABILITY CRITERIA



### GOAL 1: NO POVERTY

Children have the right to play and enjoy their childhoods without being forced to work.

#### 4.1 CHILD LABOUR

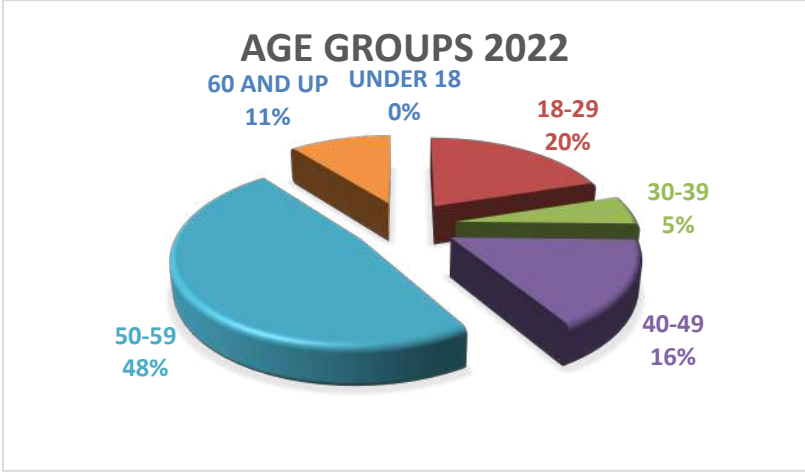
CORMAS SPA does not use or support child labour in any way.

In any case, Cormas SpA has drawn up a specific “*Child welfare programme*”, which sets out the financial and other assistance provided by the Company to help minors remain at school until such time as they are no longer considered “child workers”.

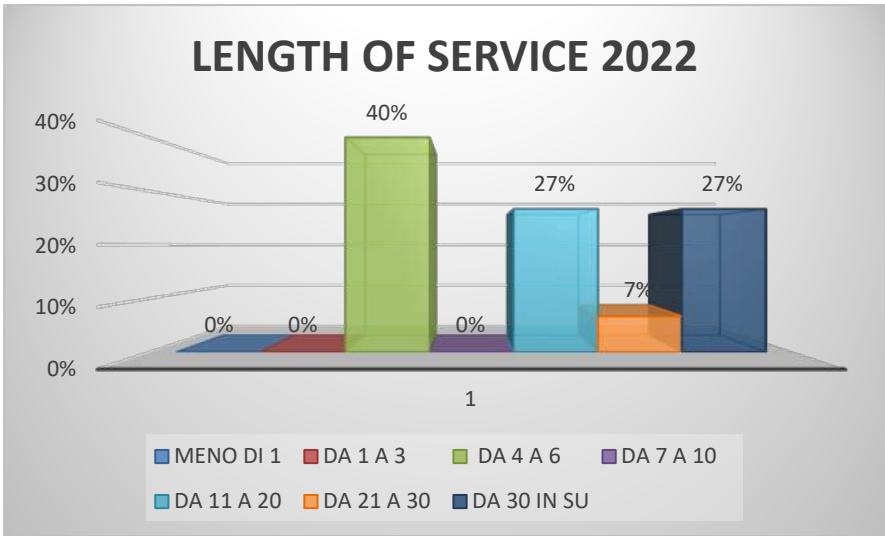
The child labour procedure is circulated throughout the organisation, posted on the company noticeboard and made available to all stakeholders.

In the event that CORMAS SPA did benefit from work done by children, their employment would be governed by national law and in any case could only take place outside of the hours of mandatory school attendance.

The time spent by a child on school, work and travel cannot exceed 10 hours per day. Under no circumstances can the working day exceed 8 hours. Young workers are not permitted to work at night, and under no circumstances would the Company ever act in a way that would harm the physical or mental health of a child or young worker.



CORMAS SPA is a company that represents all age groups: 38% of the workforce is aged under 40, 55% are aged between 40 and 59, while 7% are aged 60 and up.



CORMAS SPA has been addressing the generational turnover during the past few years. The workforce comprises both long-term employees and personnel hired just a few years ago, and the Company has a strong propensity to retain its staff - something that is becoming increasingly important at a time when it is difficult to consolidate employer-employee

UNDER 1	1 TO 3	4 TO 6	7 TO 10
11 TO 20	21 TO 30	30 AND UP	



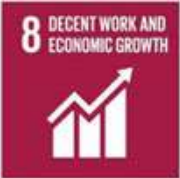
The graph shows that there is a good balance between production operatives and clerical staff.



GOAL FOR 2023:



No recourse to child labour whatsoever. The remedial actions detailed in the relevant procedure will be taken in the event that child labour is found to have been used wrongly.  
Incentives for apprentices.

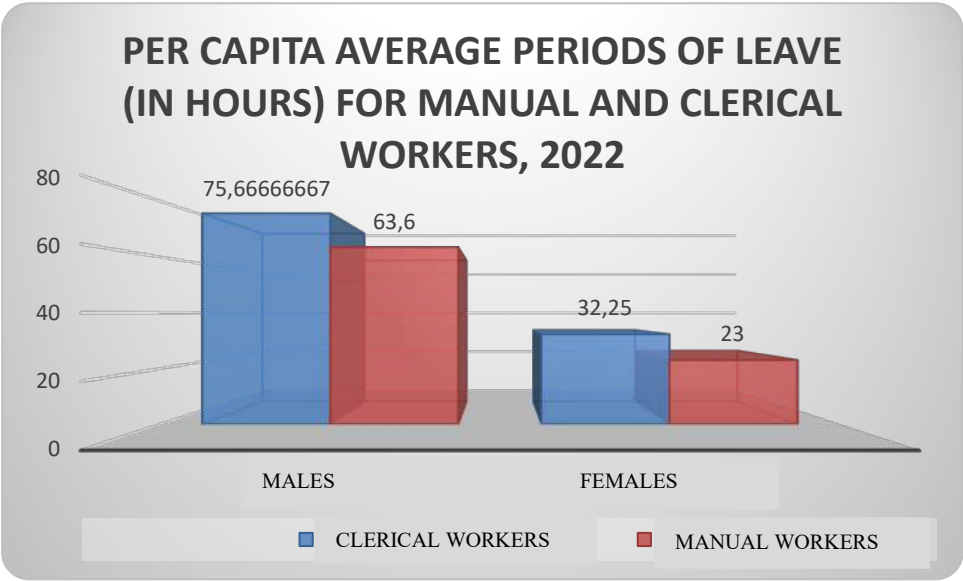


**GOAL 8: DECENT WORK**  
Humans have the right to be free, and not to be subject to any form of slavery, physical or mental abuse.

**4.2 FORCED AND COERCED LABOUR**

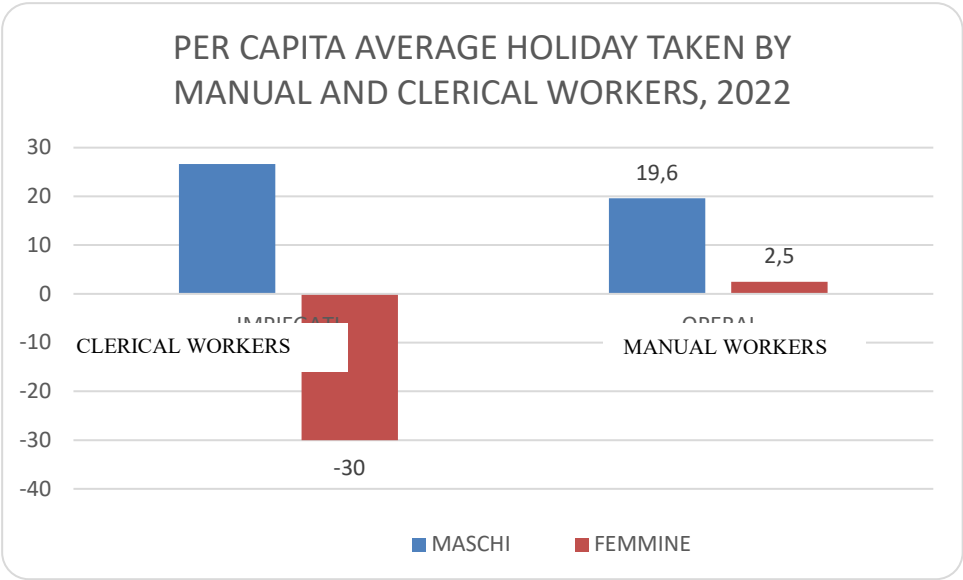
There is no form of forced labour within our company. All overtime is at the worker’s own discretion. It is not obligatory and must be authorised. The Company does not keep any documents or cash as a deposit to coerce workers. The Company respects full freedom of expression and does not support the trafficking of human beings. To ensure that this requirement is enforced, CORMAS SPA is committed to ensuring that all workers are fully aware of their rights and duties under their contract of employment. We do this by:

- Clearly communicating the collective labour agreement under which all personnel are hired
- Giving each employee a copy of their personal contract of employment
- Providing workers with full information about their contracts and payroll, through the HR Office

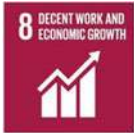


The graph below shows that the average per capita number of periods of leave is very low, and is more common among male workers, both clerical or manual. This means that male workers are using

their available periods of leave to a lesser extent.



As can be seen from the graph, almost all holiday entitlement is used and in some cases, the Company has granted periods of holiday in advance.



GOAL FOR 2023

No use of forced or coerced labour. Control of per capita overtime and of holiday entitlements/periods of leave taken and remaining during the year.



GOAL 3: GOOD HEALTH AND WELL-BEING

Cormas guarantees health and safety in the workplace, for example by providing training on the prohibition of alcohol and drugs. We also safeguard female workers during pregnancy, and working mothers

4.3 HEALTH AND SAFETY

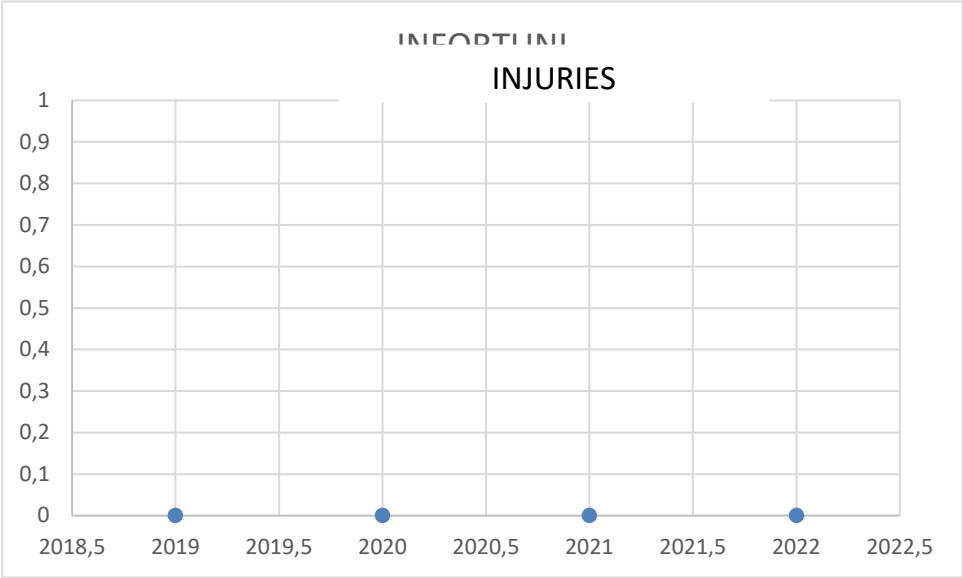
The company Safety Committee considers that one of the primary objectives of CORMAS SPA is the need to safeguard workers' health and safety by adopting procedures, methods, controls, guidance and training processes designed to ensure that:

- safety aspects are seen as essential, in all working activities;
- there is an objective assessment of all the risks of work activities performed by the Company's personnel, and of the risks linked to environment and company infrastructure;
- all the technical and operational precautions are taken as necessary in order to prevent or limit accidents posing a risk of injury or damage to health;
- all roles and levels within the Company (senior management, functional leads and supervisors) participate in the reaching of worker health and safety objectives, based on their own authorities and roles
- all workers are given regular job-specific training;

- procedures are put in place, together with control and compliance systems.

All requirements pertaining to Consolidation Act 81/2008 are controlled by the use of calendars.

With regard to accidents, in 2022 the Company continued with its intention to guarantee a safe and salubrious working environment.



Actions are ongoing to raise staff awareness of safety and to build a health and safety culture within the organisation. The correct use of PPE is constantly monitored by supervisors, who also research good, safe working practices. As in previous years, there were no accidents in 2022.

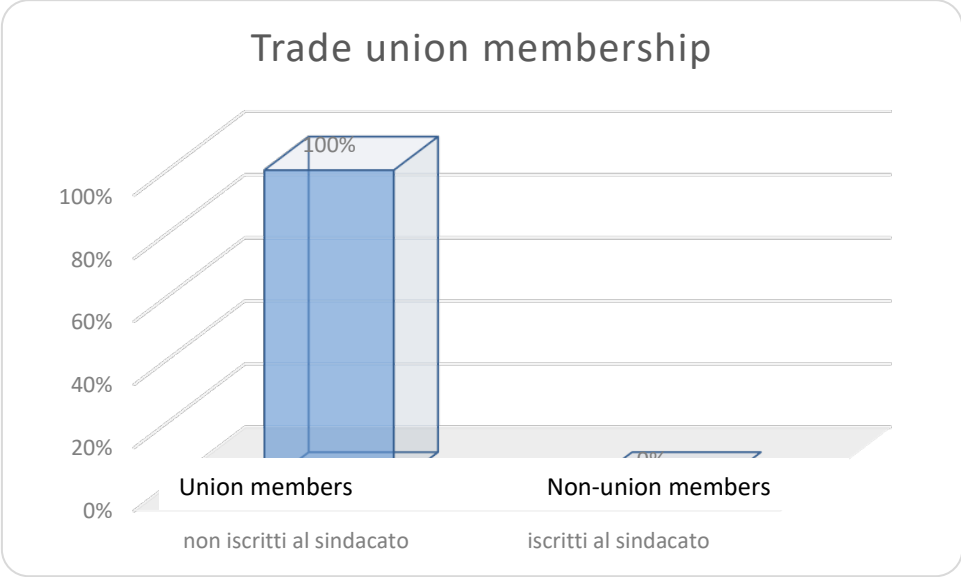


**GOAL FOR 2023**

To carry out the annual evacuation drill; to continue the provision of training and guidance on safety issues; to constantly monitor the conformity of the workplace and the use of PPE.

**4.4 FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING**

All personnel have the right to form, organise and attend meetings of trade unions of their own choice, and to enter into collective bargaining with the Company. Cormas does not impede the right of workers to join a trade union.



Periodic trade union meetings may be organised on company premises during working hours, according to the legal limit which is 10 paid hours per year, per worker, or alternatively outside working hours (an unlimited number of hours) - see the provisions of the Workers' Statute, Law 300/1970 as

amended

The Company has no trade union representatives. Although Management does not impede the presence of trade unions in any way, there are no union-registered workers within the Company.



GOAL FOR 2023

To support the well-being of workers, also by guaranteeing freedom of association and by not impeding in any way the decisions of workers to join any form of trade union.



GOALS 5 AND 10: GENDER EQUALITY AND REDUCED INEQUALITIES

We guarantee equal opportunities, gender equality, equal pay and equal training

4.5 DISCRIMINATION

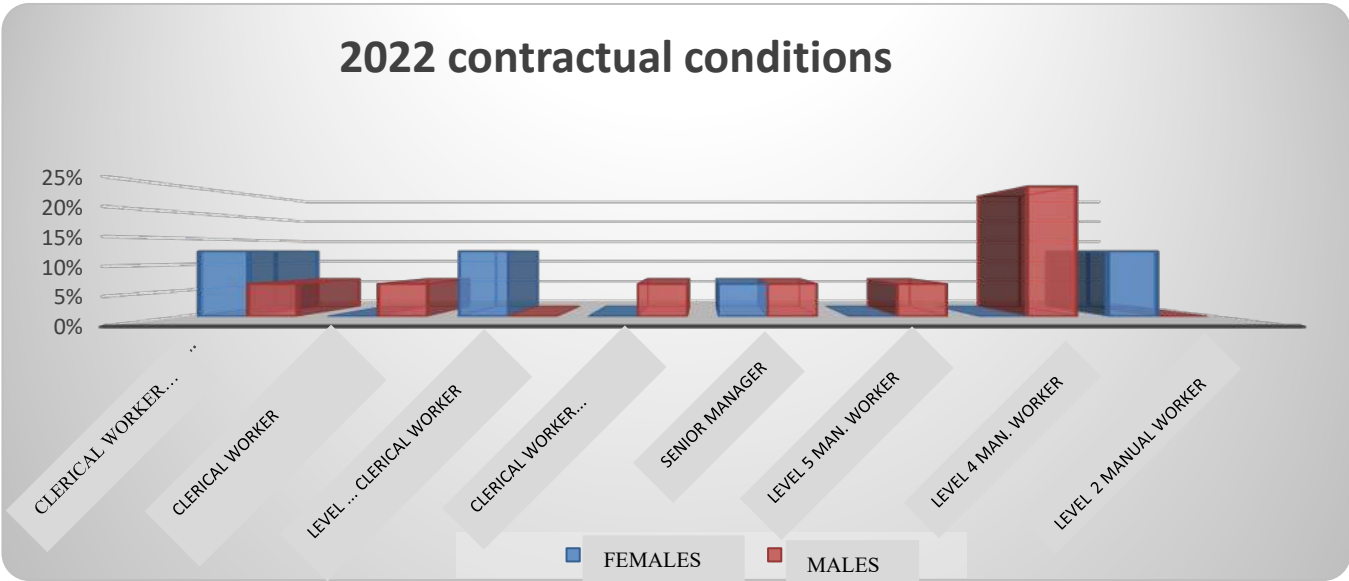
The Company does not use any form of discrimination - in recruitment, pay, access to training, promotion, termination of contract or pension provision - based on race, nationality, regional or social background, caste, birth, religion, disability, gender, sexual orientation, family responsibilities, civil status, trade union membership, political opinions, age or any other condition that could lead to discrimination.

Under no circumstances does CORMAS SPA interfere with the exercise of the rights of its personnel to follow their own political or religious beliefs, pursue family commitments and responsibilities, sexual orientation, requirements related to nationality or social background, race, disability, gender or trade union membership.

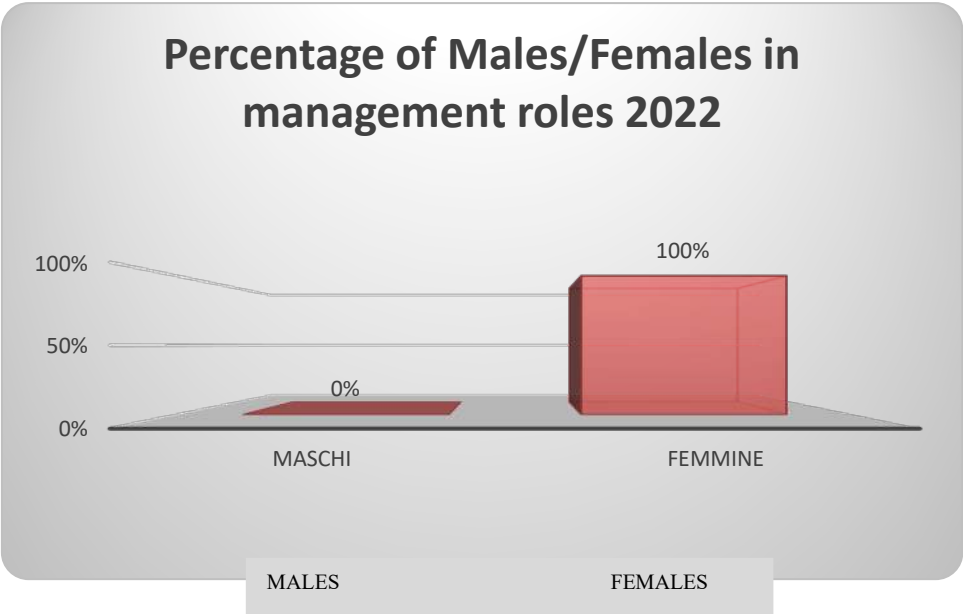
Company aims to respect all forms of positive discrimination in the hiring of protected categories, in accordance with the legal limits. Italian Law 68/99 provides that companies with more than 15 staff must employ at least one worker from a protected category. The law requires that the number of protected-category hirings must increase, as the workforce grows Between 15 and 35 staff, one person with a disability must be hired; this number rises to two from 36-50, and from 51-150 employees at a percentage of 7% plus one, and so on.

CORMAS SPA monitors the climate within the organisation in order to prevent any episode of physical or verbal abuse or threatening, offensive exploitative or sexually coercive behaviour against any member of the company, wherever they may work.

The Ethics team constantly checks to ensure that no such situation occurs and if necessary will take prompt action in order to eliminate any form of possible discrimination. Cormas never requires workers to undergo pregnancy or virginity tests.



The Company's workforce has a good balance between male and female roles. Most of the workers in the production area are male, and most of the workers in clerical roles are female.



The Company's Management is composed 100% of women.

Most of the Company's workforce are of

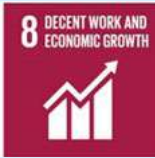
Italian nationality.

Some of the workers are foreign

citizens who have been living in Italy for many years.



- GOAL FOR 2023: to guarantee equal access to employment and career openings offered by CORMAS SPA, by promoting opportunities within the company;
- maintain the current male to female ratio at the existing levels;
- maintain the current system of skills-based pay grades;
- maintain a merit-based bonus system.



## GOALS 8 AND 10: DECENT WORK AND REDUCED INEQUALITIES

We guarantee equal opportunities, gender equality, equal pay and equal training

### 4.6 DISCIPLINARY PRACTICES

Our Company treats all personnel with dignity and respect. The Company has implemented a system whereby workers can report any disciplinary issues, in order to incentivise cohesion between Management and the workforce and to increase workers' awareness of mistakes that must not be repeated as they are harmful to workers' health and to the efficiency of the business.

The main rule to be adopted is to follow a graduated procedure, consisting of:

- verbal warnings
- written warnings
- fines
- suspension
- dismissal

These measures are taken in accordance with the requirements of:

- Consolidation Act 181/2008;
- the national collective agreement for the goldsmith sector.

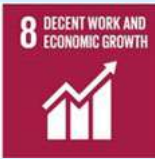
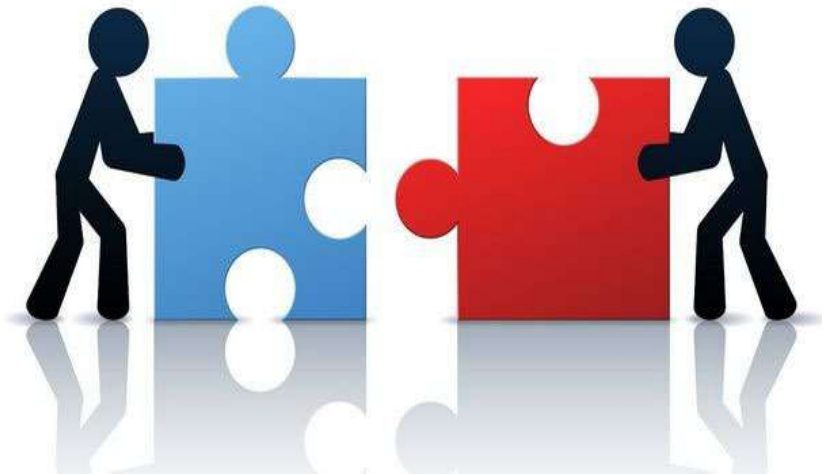
No disciplinary cases arose in 2022.

The Company has put in place a system of reports, which may be made anonymously, to allow workers to raise grievances or make suggestions. No complaints or reports were made by workers or external stakeholders in 2022.



### GOAL FOR 2023

Not to have any violations of the disciplinary code and to maintain a collaborative working environment. Achieve equal pay for equal skills.



GOAL 8: DECENT WORK

4.7 WORKING HOURS

At CORMAS SPA the working week is 40 hours, 8 hours per day, 5 days out of 7. All workers have at least 1 day off, after working 6 days.

In particular, the Company complies with the provisions of the National Collective Agreement for the fashion industry, and with legislative decree 66/2003. Specifically: the normal working week must not exceed 40 hours on average. The national collective agreement requires that no more than 2 hours' overtime can be worked per day, and no more than 8 per week. In addition:

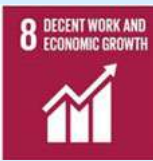
- each worker has the right to minimum of 11 hours' rest during any 24-hour period;
- a break from work is required if more than six hours are worked in a day;
- for each seven-day period, the worker must have a minimum period of 24 hours' uninterrupted rest, usually on a Sunday, added to the 11 hours of daily rest
- all workers must have at least four weeks' annual paid holiday.

Attendance recording and the monitoring of hours worked are now the subject of close attention. No overtime hours were recorded in 2022.



GOAL FOR 2023: never exceed 250 hours of overtime annually; guarantee holidays and periods of leave during the year as per the provisions of the nation





GOALS 2 AND 8: ZERO HUNGER AND DECENT WORK

4.8 PAY

Pay levels reflect the national working agreement for the jewellery industry, and exceed the living wage. A copy of the collective agreement is available to all workers within the company.

The living wage was calculated on the basis of the minimum subsistence wage calculated by ISTAT for a family in northern Italy consisting of three people (two adults and a child aged between 4 and 10) resident in a city with more than 50,000 inhabitants. A 10% uplift was applied to that amount, by way of discretionary pay; this calculation produced a result that is clearly lower than the minimum pay offered by our Company.

The lowest contractual level employed by the Company is "Level 3 manual worker". Salaries are paid once a month, without delay.

The payslip includes all the legally-required deductions and always reflects the hours worked and the role held. 100% of workers have health care plans.



GOAL FOR 2023:  
To guarantee decent pay levels. To guarantee that salaries are paid once a month, without delay.







GOALS 6, 12, 13, 14 and 15: CLEAN WATER, RESPONSIBLE PRODUCTION AND CONSUMPTION, LIFE ON EARTH, CLIMATE CHANGE AND LIFE BELOW WATER



#### 4.9 ENVIRONMENTAL PROTECTION AND PERFORMANCE

CORMAS SPA is based in an industrial zone in Creazzo, in the province of Vicenza.

CORMAS SPA has appointed a person responsible for the environment management system (EMS), whose task is to oversee compliance with all applicable environmental regulations.

The Company obtained the Single Environmental Authorisation (Authorisation no. 31713/AMB) on 2 May 2013 (expiring in 2028) for atmospheric emissions. Chimneys are monitored annually, in accordance with the authorisation requirements. The heating systems are regularly checked and the factory has been entered on the register of industrial heating systems kept by the Regional Government of Veneto, with the most recent inspection carried out on 20 January 2023.

The air conditioning systems are monitored each year by personnel with knowledge of F-gas legislation: no leaks have been found in the systems.

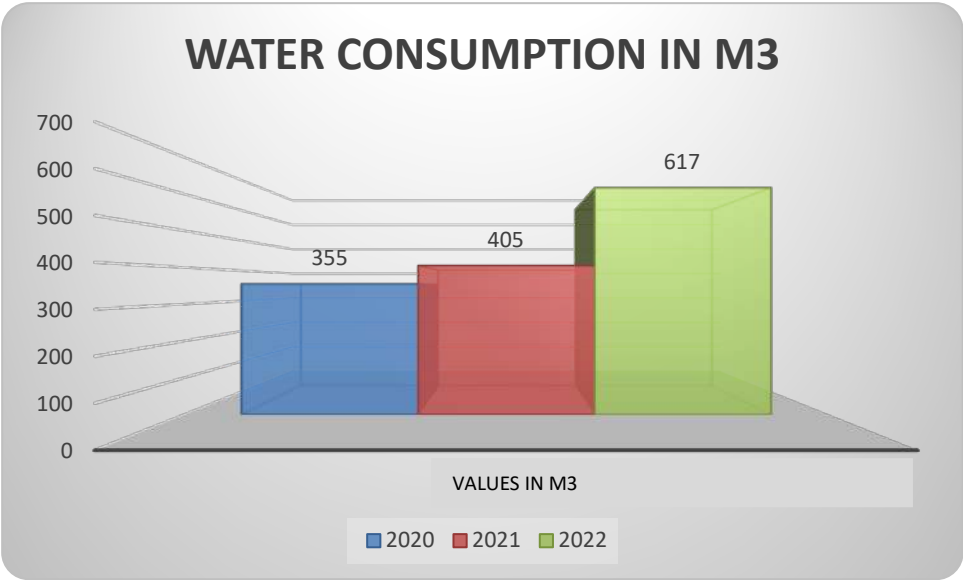
With regard to the testing of the main environmental indicators, we use the following matrices:

**WATER:** CORMAS SPA operates in an industrial zone and monitors its water consumption, as illustrated in the table. Water is used for sanitary purposes and in the furnace cooling circuits.

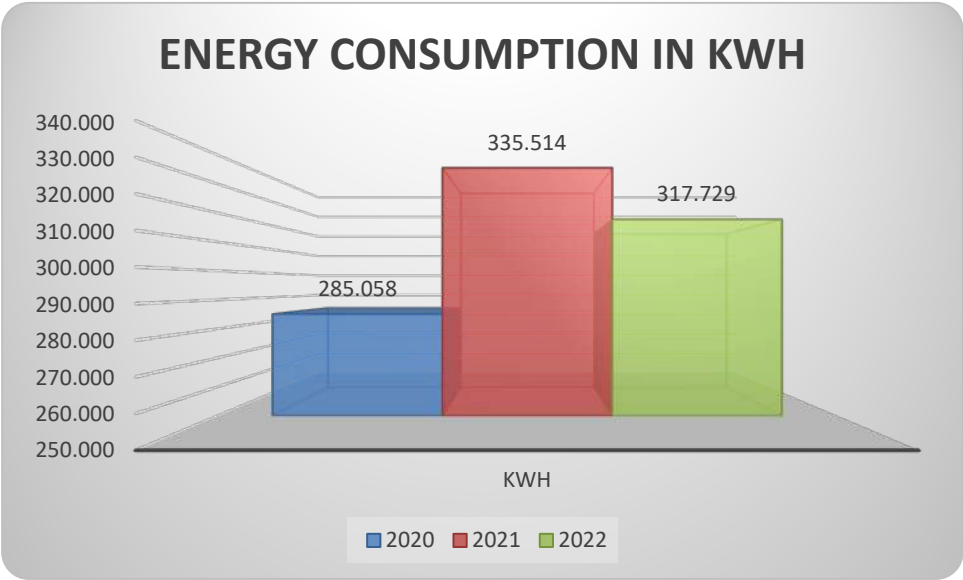
**AIR:** CORMAS SPA has a Single Environmental Authorisation for atmospheric emissions. Analytical tests are carried out once a year to ensure compliance with the legal emissions limits.

**WASTE:** CORMAS SPA duly files all the required declarations on waste disposal.

**SOIL:** there are no relevant environmental aspects in this area.

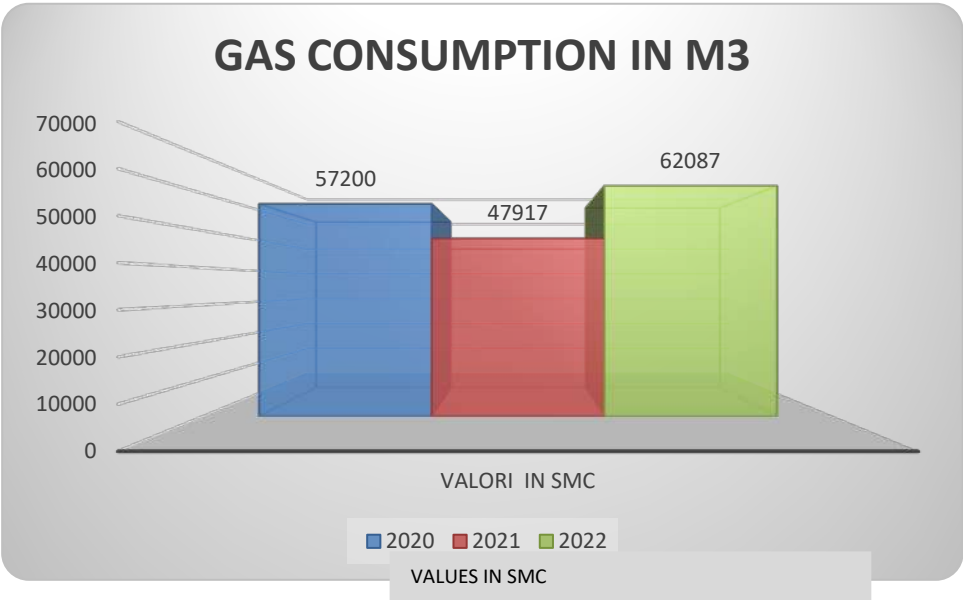


Water consumption is not particularly high. Water is used in the furnace cooling circuits, and for sanitary purposes. The rise in consumption is due to an increase in production.



Electricity consumption has fallen thanks to an optimisation of the production process and various measures to reduce consumption.

For example, all neon lights have been replaced with LED lighting. Presence sensors have been installed, so that the rooms are only illuminated if people are present within them.

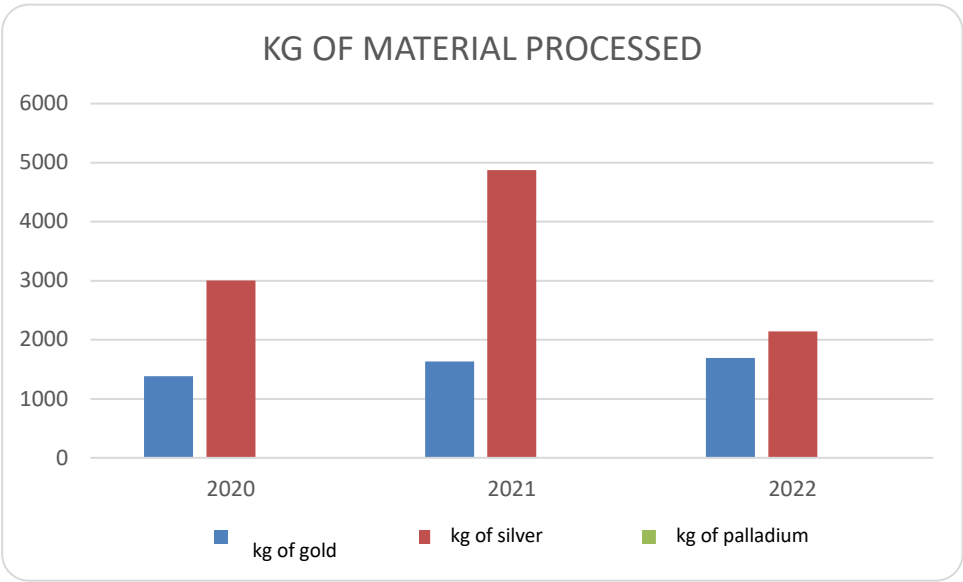


Gas consumption was higher in 2022 compared to the previous year, because of the increased production and greater use of the melting furnaces.

The Company has installed a timer to reduce the amount of gas used by the heating system.

reduce the amount of gas used by the heating system.

used by the heating system.



In 2022 there was an increase in the production of gold and a reduction in the quantity of silver processed. Palladium was processed in smaller quantities.

At the end of 2022, the Company obtained RJC COP and COC certification and began to deal in mainly recycled materials, helping to reduce the negative impacts caused by the mining of precious raw materials.



**GOAL FOR 2023**

To increase the volume of RJC COC material, especially recycled materials.

To identify ways to raise the efficiency of the production process in order to reduce consumption of electricity, gas and water.

#### 4.10 DUE DILIGENCE ANALYSIS

CORMAS SPA has conducted a due diligence analysis in relation to sustainability principles, in line with the OECD Guidelines. This covered not only our own organisation but also the Company's supply chain and partners.

The outcome of this was a risk analysis, the aim of which is to identify potential issues in terms of compliance with RJC COP requirements, and to enable prompt intervention to resolve any issues by implementing corrective actions.

The supply chain has been qualified, to address a series of risks identified according to the required criteria. All customers have been mapped to ensure that the entire supply chain meets the requirements of legality, social responsibility and sustainability imposed by the sustainability standards. The preparation of the Sustainability Report also included the approval of a list of qualified suppliers, with confirmation of their adopted methods.

#### 4.11 MANAGEMENT SYSTEM

CORMAS SPA has adopted a system for the management of corporate social responsibility that conforms to the requirements of the RJC CoP standard.

Below is a summary of the actions taken to maintain the requirements of the codes of ethics adopted by our Company.

**POLICY ON ETHICAL RESPONSIBILITY:** SEE the introduction to this Sustainability Report.

**Management review:** Each year, Management reviews the results of the sustainability system. During the review, Management will check that all goals have been met in relation to all the aspects examined, and whether any corrective actions have been taken. It will also approve the plan for improvement.

**Planning and implementation:** With a view to continuous improvement to ensure that all personnel are aware of sustainability issues, CORMAS SPA prepares and implements training plans to support the training provision offered to personnel at various levels, in relation to sustainability topics.

Suppliers are constantly monitored by means of an information-gathering system, and are required to comply with our sustainability principles.





## GOAL 17: PARTNERSHIP FOR THE GOALS

**CONTROL OF SUPPLIERS:** the objective of CORMAS SPA is to make a contribution to improving the conditions of workers throughout the production chain.

The Company has drawn up and maintains active procedures for the rating and qualification of suppliers, based on their ability to fulfil the requirements of our ethical standards.

The Company's objectives in this field are based on the following criteria:

- the selection of reliable suppliers who can meet the ethical requirements
- monitoring of the supplier's performance over time
- adoption by the supplier of corrective actions, which may be required if ethical requirements are not fully met
- involvement of the supplier in the process of continuously improving the sustainability system.

In practical terms, our providers are assessed on the basis of an Ethics form, which is sent to all suppliers for acceptance.

CORMAS SPA keeps records of the social responsibility commitments of all its suppliers, including their written undertaking to:

- meet all the requirements of the RCJ COP standard
- participate in the surveillance actions implemented by CORMAS SPA.

- promptly remedy any identified non-conformities, with regard to the requirements of the RJC CoP standard.
- immediately provide CORMAS SPA with full details of all their relations with other suppliers or subcontractors, in regard to the supplies requested.
- cooperate with inspections of their premises by CORMAS SPA, if requested.

### COMPLIANCE ISSUES AND CORRECTIVE ACTIONS:

sustainability complaints are managed through a reporting procedure, whereby interested parties can send complaints or reports, or provide information about the system of ethics management and compliance with the requirements of the system and reference standards. Written complaints (which can also be made anonymously by employees) may relate to:

- third parties (suppliers or customers); these complaints should be sent by post, fax or email to the contact details given on the form available on the **company website**.
- Internal employees and contractors. These communications may be given in person by the representatives of the Ethics team, or in writing, as detailed in the Social Responsibility Manual and summarised in the complaint form.

**In 2022, CORMAS SPA did not receive any complaints from stakeholders.**

**Combating corruption and fraud:** The Company has put in place a system for the constant monitoring of work practices in order to avoid any situations of corruption or fraud. No compliance issues were raised in 2022 in relation to these areas, and no reports or complaints were received from internal or external

stakeholders. The Company has a system to allow the reporting (also anonymously) of any infringement relative to corruption or fraud.

Appropriate training is given annually, in relation to anti-corruption issues, to those roles within the Company who are particularly at risk in this area.



GOAL FOR 2023:

- 0 reports of violation of sustainability principles
- 0 cases of corruption

**INTERNAL COMMUNICATION:** the Company aims to disseminate and make available the RJC information to all staff and contractors working for the Company. This approach reflects the Company’s policy of disseminating information about its activities, and derives from an awareness of the importance of engaging staff on the issues addressed in the ethical standards. Cormas posts its Ethics policy on the company noticeboard, provides training on ethics and sustainability to all personnel and makes a copy of its sustainability report available at Reception.

Listening to customer feedback and maintaining dialogue are useful channels for monitoring user satisfaction and obtaining specific and complete information about how the Company is perceived.

The Company uses the following channels to transmit these data:

- website
- e-mail communication to customers and suppliers

**EXTERNAL COMMUNICATION:** providing detailed disclosures and accurate information has always been a priority objective for CORMAS SPA and this need has grown with the proliferation of media over recent years.

**Record-keeping:** CORMAS SPA keeps all the required records in accordance with the social responsibility and sustainability system, in order to give evidence of its conformity with the requirements of the ethical and sustainability standards it has adopted.

