



REPORTING FOR COPs 6 & 7

Contact Information

COMPANY NAME: **SPAM srl**
DATE: 30/05/2025
REPORTING PERIOD: **01/01/2024 – 31/12/2024**
CONTACT: Andrea Grifagni andrea@spamsrl.it

COMPANY MANAGEMENT SYSTEMS

SPAM srl have the following policies in place:

- Integrated Ethics, Environmental, Health & Safety and RJC *Company Policy IDpol002 rev.2 dated 27/05/2025*, detailing our commitment to respect human rights throughout our supply chain and our supply chain due diligence *gold* and *silver* originating from conflict-affected and high-risk areas.

These policies detail our commitment to respect human rights throughout our supply chain on the following minerals:

- Gold
- Silver

SPAM srl endorse these policies to our suppliers and stakeholders by distributing them via e-mail and upon request; these policies can also be accessed by our internal stakeholders via email.

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

- Suppliers Risk Assessment *Gestione KYC*
- Company Policy *IDpol002*
- RJC manual *IDman001*
- Annual Report
- External auditing (when necessary)

The senior manager responsible for overseeing supply chain due diligence is *Emiliano Vanni* as *Supply Chain Manager*.

To aid us in identifying our human rights impacts we have used the *RJC_Human_Rights_Due_Diligence_Toolkit* update yearly (last update 27/05/2025). During these analysis no **HIGH** risks has been rilevated

The responsible for overseeing our human rights impacts is *Andrea Grifagni* as RJC Responsible.

SPAM srl 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
- Forniture
- Certifications
- Risk level



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During the past year no audits were carried out at subcontractors.

The *risk level* doesn't mean simply the risk of precious metals provenience but is calculated considering the following parameters:

- Geographyc location of the supplier
- Company certifications (RJC, LBMA, SA8000,)
- Document of legal representative
- Company registration report

To every supplier and subcontractor not certified or with a risk level not LOW is sent the following documentation:

- *Subcontractor commitment IF001*
- *Internal Audit* (if necessary)

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 *Business Policy, integrated with Ethics, Environmental, Health & Safety aspects*.

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 out supply chain is **LOW**.

Our grievance mechanism for internal and external stakeholders, for the moment, is just the email system

Till today no grievances have been received. The employee responsible for these grievance mechanisms is Andrea Grifagni 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 evaluation risk*
- *Suppliers evaluation risks*

During the assessment of our own and our supplier's due diligence practices relating to human rights, we identified potential and actual risks within our supply chain.

We have analyzed risks in our "*RJC_Human_Rights_Due_Diligence_Toolkit*" file regarding the following areas:

- Child labor
- Forced and compulsory labor
- Freedom of association and the right to collective bargaining
- Non-Discrimination
- Business Partners
- Health and safety

20 risks are **LOW** level

0 risk is **MEDIUM** level (Identified as MEDIUM the risk of flames in the melting area)

0 risk is **HIGH** level

Other RJC risks have been analysed:

- Identification and traceability



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- Business continuity
- Environment
- Purchasing
- Bribery and facilitating payments
- Security
- Business partners
- Money laundering and terrorist financing

43 total risks, 28 risks are **LOW** level

We identified none **HIGH** potential and actual risks within our supply chain.

STRATEGY

Our risk assessment findings are received by *Andrea Grifagni* as RJC Responsible.

To respond to eventual risks identified within our supply chain, we use our file “*Risk analysis*” ID.R-O as described in our *RJC COP Manual*. Our risk analysis matrix 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

To respond to eventual risks identified within our supply chain, in our file “*Risk analysis*” is defined the *Risk Management Plan* and described in our *RJC manual IDman001*. Our risk management plan consists of :

- Immediately suspend or stop purchasing from the suppliers involved. Mitigate where possible.
- Immediately suspend or discontinue purchasing from affected suppliers. Mitigate where possible.
- Continue or temporarily suspend trade with suppliers but implement measurable mitigation actions. Suspend or discontinue if mitigation measures are ineffective.

SPAM srl provided the training regarding human rights to our employees on 27/05/2025; this training included information on:

- Standard RJC-COP-April-2019
- Responsible supply chain
- Human Rights and Working Conditions
- Health, Safety and Environment
- RJC Policy
 - o Social and Human Rights
 - o Commercial, Anti-Corruption, Anti-Bribery and Anti-Money Laundering Policy
 - o Security
 - o Environment
 - o Health & Safety



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SPAM srl communicate to our stakeholders regarding our due diligence activities and efforts to prevent human rights risks. This communication in the form of Annual Report is available upon request. 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** regarding human rights or our supply chain

CARRY OUT A THIRD PARTY AUDIT

SPAM srl has joined the RJC in 2022 and achieved COP certification on July 2022.
The third party audit for **SPAM srl** is in program for July 2025.

SPAM srl's CEO
ANDREA GRIFAGNI