

# REPORTING

*(Application of 3.1 del COP RJC) Year 2024*



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## SECTION A: COMPANY IDENTITY

Top Gold srl has been active in the production and distribution of blank jewelry since 1991. Well established internationally, it exports to the main world markets, America, Europe, and the Middle East. It is a young and flexible company that combines these characteristics with the experience of professionals who have been working in the sector for a long time.

Thanks to modern business management and a vast, constantly updated product catalog, Top Gold srl is able to meet the most diverse market demands.

**MISSION:** Top Gold srl's main objective is to achieve quality in terms of products, customization, delivery, and customer service. Quality is pursued through continuous research into cutting-edge technologies, attention to all stages of production, and staff training. These elements ensure a high level of jewelry products and fully efficient services.

**PRODUCTION** designs, plans, and handcrafts elegant and modern collections of hollow jewelry (bracelets, pendants, and earrings). All jewelry collections are exclusive creations, models that stand out for their original style and accurate workmanship.

TOP GOLD SRL has implemented a quality system in accordance with ISO 9001:2015 standards, achieving certification in July 2018.

Top Gold has also been a certified RJC member since 2016.

## A.1) RJC POLICY

Management has evaluated its Policy drafted on February 8, 2016, which was amended on January 8, 2018, integrating it with the company's Quality System and subsequently updated on January 14, 2020. This policy is still considered appropriate.

### COMPANY POLICY

Quality, timeliness, precision gained through years of experience in the goldsmith sector, flexibility, punctuality, and availability of samples tailored to customer needs are the main means of competing in the foreign and Italian markets.

The objectives of TOP GOLD Srl are to achieve maximum customer satisfaction by meeting their expectations and explicit and implicit needs through the supply of precious metals, as well as to respect the needs of internal and external stakeholders identified in the context analysis.

In order to provide maximum transparency to its stakeholders, TOP GOLD srl has decided to implement a quality system compliant with the ISO 9001 standard in order to guarantee the reproducibility of its processes and to identify, through the analysis of business process risks, any risks or opportunities to be monitored.

Furthermore, as a guarantee of compliance with ethical, safety, and environmental requirements, TOP GOLD SRL has been RJC certified since 2016.

TOP GOLD srl complies with the laws in force and the relevant technical standards of its sector, ensuring constant information on updates and their timely implementation.

TOP GOLD srl is committed to complying with the RJC Principles and Rules of Procedure by informing our stakeholders (employees, collaborators, suppliers, and customers) about the principles contained therein, also disseminating them by sharing this Policy on our website.

TOP GOLD srl has carried out a risk analysis not only for the purposes of 9001 but also to assess the risks to our business arising from our business partners, analyzing the most sensitive situations and implementing appropriate procedures and controls in compliance with human rights, social principles, and the environment.

The Company's relationships with suppliers and external collaborators, in pursuit of maximum competitive advantage, are based on loyalty, impartiality, and respect for equal opportunities for all parties involved.

TOP GOLD SRL requires its suppliers and external collaborators to comply with the principles and requirements set forth in this RJC Policy.

We do not tolerate any form of corruption towards public officials or any other party, in any form or manner, in any jurisdiction, even where such activities are permitted, tolerated, or not prosecuted in practice.

Company personnel involved in acts of active or passive corruption will be subject to disciplinary sanctions as provided for in the applicable National Collective Labor Agreement. Furthermore, Top God srl is not involved in any political donations.

If Top Gold srl deems it appropriate, it may make charitable contributions or sponsorships, but only on the basis of objective evidence from reputable and involved entities, as well as appropriate verification of the use of any funds donated (purchase invoices justifying the amount donated).

The payment of bribes or acceptance of any goods is prohibited.

We will not tolerate money laundering and/or the financing of terrorist activities. We are committed to Know Your Customer and Supplier activities.

We are committed to providing full and detailed information on the characteristics of the products we sell.

We are committed to taking appropriate measures to ensure the integrity and security of product shipments. We are committed to respecting the principles of confidentiality and protection of confidential data.

We will exercise the utmost vigilance over our supply chain. Specifically, for the supply of gold, we use only LBMA-certified gold.

We are committed to ensuring product security measures within our premises and during shipments to prevent theft, damage, or substitution.

We are committed to maintaining the safety and well-being of Employees, Visitors, and other relevant Business Partners.

We believe in and are committed to respecting fundamental human rights and the dignity of each individual, in accordance with the United Nations Universal Declaration of Human Rights. We do not tolerate the use of child labor. We are committed to not using any form of

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forced labor, bonded labor, contract labor, or prison labor, and not to restrict the freedom of movement of employees and workers.

We are committed to ensuring high health and safety standards at our headquarters and in our business, and the Employer directly holds the role of Occupational Safety Manager.

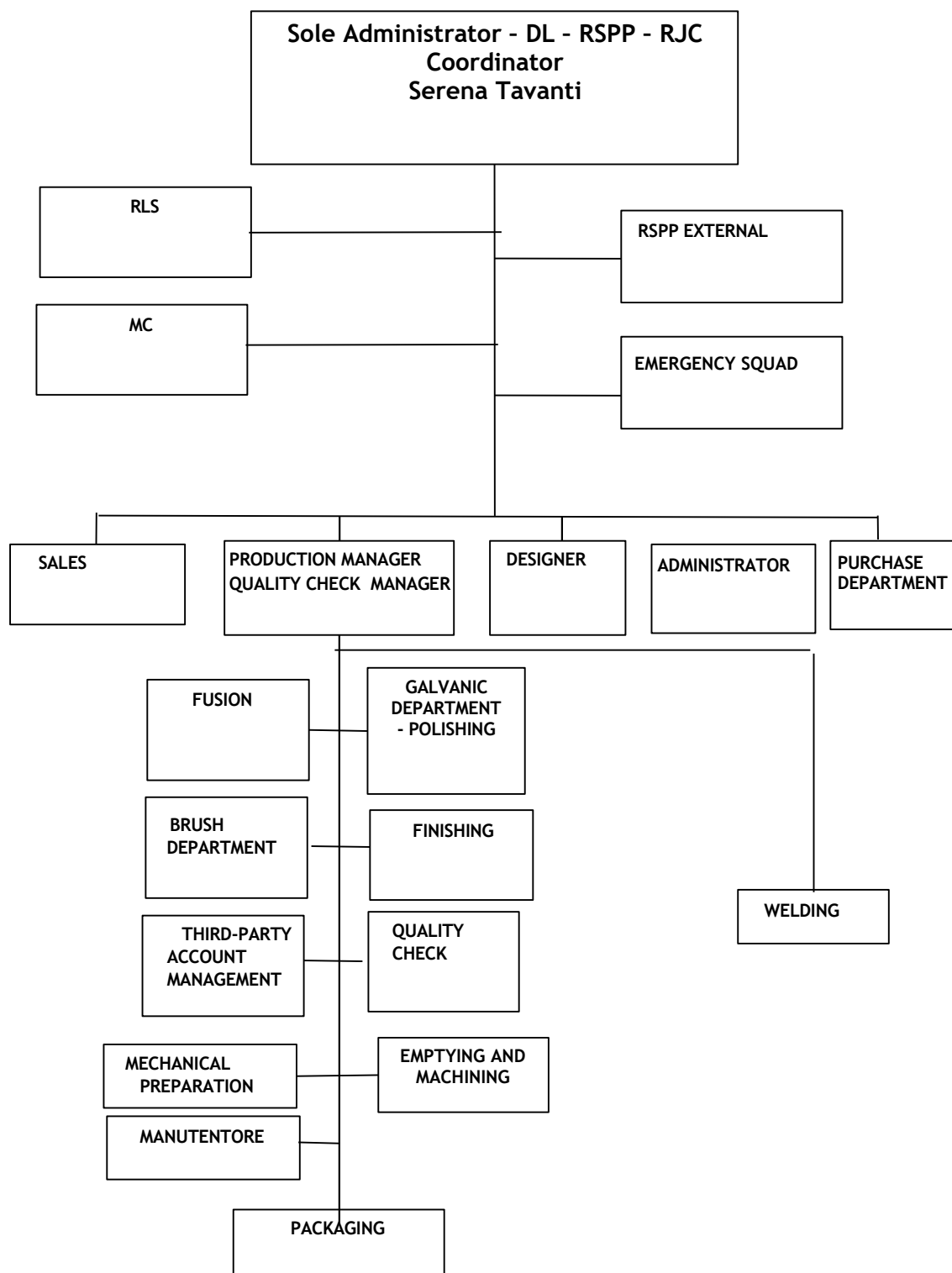
We are committed to not discriminating on the basis of race, ethnicity, caste, country of origin, religion, disability, gender, sexual orientation, union membership, pregnancy, political affiliation, marital status, physical appearance, age, or other restrictions not permitted in the workplace, so that all persons “suitable for work” are given equal opportunities without discrimination based on factors unrelated to their ability to perform the job. We are committed to not practicing corporal punishment under any circumstances and to prohibiting the use of degrading treatment, harassment, abuse, coercion, or intimidation in any form. We are committed to establishing a procedure for handling disciplinary disputes regarding behavior that does not comply with COP standards.

We are committed to complying with current legislation on working hours and remuneration and, in the absence of such legal requirements, to adopting the prevailing standards in the sector.

Overtime is voluntary and is not a reason for discrimination against workers who do not participate. We are committed to protecting the environment.

## A.1) ORGANIZATIONAL CHART

Management also wanted to define an organizational chart with the aim of empowering and increasing the loyalty of its internal resources.



### A.1) THE ORGANIC

The workforce of TOP GOLD SRL currently consists of 47 employees, including 40 permanent employees, 5 fixed-term employees, 1 apprentice, and 1 administrator.

In 2021, there are no interns.

Below is an analysis of the distribution by age group, length of service, and residence.

Ages Groups (YRS)	18 - 20	20 - 25	26 - 30	Over	Total
Number	0	4	6	37	47

Length of service in the company (YRS)	0 - 2	3 - 4	5- 6	Over	Total
Numero	19	13	8	7	47

Origin	Number of employees
Municipality and Province of Arezzo	45
Other provinces in the region of Tuscany	1
Other provinces in Italy	1

FOREIGN NATIONALITY	Number of employees
BANGALDESH	6
PAKISTAN	5
INDIA	4
ROMANIA	3
MACEDONIA	1



## **A.2) RJC COP APPLICATION**

With a view to continuous improvement in organization, processes, and products, and in line with the social sustainability project promoted by the RJC, management has set itself the goal of implementing and certifying its system in accordance with the Responsible Jewellery Council (RJC) standard, currently updated with the 2019 edition.

### **COP 5.1 BUSINESS PARTNERS**

A business partner is defined as an organization or business entity with which TOP GOLD SRL has direct business relations and which purchases and/or sells a product or service that directly contributes to the manufacture or sale of jewelry products with Preziosi. This includes customers, suppliers, and all entities that provide services related to the requirements of the RJC Code, such as security service providers for whom due diligence is required.

TOP GOLD SRL's customers are located both in Italy and abroad, mainly wholesalers and retailers.

The company policy is not to sell directly to the public or to employees.

The Code of Practice requires RJC Members to involve stakeholders in the application of the RJC requirements, based on their potential.

To this end, TOP GOLD SRL has sent all its customers its RJC Policy, which states how TOP GOLD's management is committed to complying with these principles.

For suppliers involved in the Code of Practice, with the exception of banks, TOP GOLD has prepared a self-certification of RJC requirements application.

All suppliers are sent a copy of TOP GOLD's Policy.

Customers involved	Policy RJC	Result %
144	144	100%

Suppliers involved	Policy RJC	Result %
25	26	100%

## **COP 11. Corruption and Facilitation Payments**

The term corruption means offering, promising, or giving, as well as receiving or accepting, any undue advantage, either directly or indirectly, to or from:

- a public official or government official (politically exposed person);
- a candidate, political party, or political official;
- employees, managers, or officials in the private sector (including anyone who manages or works for a private company in any capacity) or their agents or representatives.

Facilitation payments are made to receive favorable treatment for something that the recipient of the payment must do anyway.

In the history of TOP GOLD SRL, there have never been any cases of corruption or bribery.

The RJC Policy prohibits any form of corruption and bribery.

TOP GOLD SRL has established procedures to manage the risk of corruption and facilitation payments:

- Passive cycle management
- Sales and collections management.

TOP GOLD SRL has raised awareness among the internal staff involved with a training session on this topic.

## **COP 12. KNOW YOUR COUNTERPARTY (KYC): MONEY LAUNDERING AND TERRORIST FINANCING**

At the legislative level, TOP GOLD SRL operates in compliance with the regulations on money laundering (Anti-Money Laundering Decree, which partially repealed and replaced Law No. 197 of July 5, 1991).

TOP GOLD SRL applies the Sales and Collections Management procedure. For new suppliers, procedure P 11 “Supplier Qualification and Monitoring” of January 8, 2018, has been activated.

## COP 15-22 Workers' rights and working conditions

TOP GOLD SRL applies the National Collective Labor Agreement for goldsmiths and silversmiths.

The internal regulations for working hours and holidays scheduled for 2020 are still in force.

### Types of contracts:

n° EMPLOYEES HIRED	EMP. PERMANENT	EMP. FIXED-TERM	APPRENTICES	AGENCY
47	41 85%	5 11%	1 1%	0

No disciplinary sanctions were imposed in 2024.

Employees may formally report any findings regarding non-compliance with RJC company policy and/or the requirements of this standard and/or complaints and/or reports of theft/intrusion. No reports were received in 2024.

TOP GOLD SRL does not employ workers under the age of 18 in its production activities.

TOP GOLD SRL does not hinder forms of trade union association, as stated in the RJC Policy.

In 2021, there is a CGL trade union, but no employees are trade union representatives.

### COP 23. Health & Safety

TOP GOLD SRL uses a qualified external company to manage safety issues in order to constantly monitor the requirements of Legislative Decree 81/08.

In 2021, TOP GOLD SRL carried out the following actions:

- Update of safety documents October 2021
- Training in accordance with regional regulations for new hires
- Medical examinations
- Evacuation drill
- Periodic meeting pursuant to Article 35

### COP 22-25 Environmental Management

TOP GOLD SRL has analyzed environmental aspects, identifying potential risks including:

- increased business costs due to excessive use of resources (natural gas, electricity, water)

- application of administrative penalties for soil and air pollution penalties for noise pollution
- penalties for the use of prohibited substances
- incorrect waste management

No particular risks were identified, as the company manages waste correctly by implementing procedures and controls.

In 2020, we introduced operational instructions for the management of company waste.

On November 29, 2019, specific environmental training (waste management, water management, environmental damage, external noise and atmospheric emissions, and hazardous substances) was provided to new hires.

We continue to monitor consumption, in particular:

resource	2015	2016	2017	2018	2019	2020	2021
water mq	443	299	373	393	611	446	668
gas smc	6403	5325	5452	4790	5031	4120	6246
Electric power Kwh	355072	439826	464809	464157	459136	358941	433222

In 2022, we plan to restructure the emptying department in order to make it safer and more agile.

We also plan to install a production water purification system so that water can be used continuously, reducing water consumption and waste costs.

## CONCLUSIONI

### Letter from the Sole Director

The goal is to create “value” for all stakeholders in both the short and long term.

With this in mind, our work is aimed at achieving objectives that are both economically and socially effective, in the knowledge that the growth and development of the local area are fundamental conditions for the growth of the Company itself.

Through this Report, TOP GOLD SRL intends to demonstrate how its declared desire to qualify as a socially responsible player has been translated into actions and

concrete facts, consistent with our core values, shared mission, and strategies. We therefore believe that this tool legitimizes our role in ethical and social terms in the eyes of the community we serve and the gold market.

**TOP GOLD SRL**

**Serena Tavanti**

