

# REPORTING

*(in accordance with provision 3 of COP RJC 2024)*

YEAR 2026



## INDEX

<b>SECTION A: GENERAL INFORMATION</b> .....	3
A.1) COMPANY PRESENTATION .....	3
A.2) RJC STRATEGY AND POLICY .....	4
A.3) GOVERNANCE.....	7
A.4) ENGAGEMENT OF STAKEHOLDERS .....	9
A.5) ETHICS AND SUSTAINABILITY.....	10
<b>SECTION B: SPECIFIC STANDARD INFORMATION</b> .....	11
COP 1 LEGAL COMPLIANCE .....	11
COP 5 BUSINESS PARTNERS.....	<b>Errore. Il segnalibro non è definito.</b>
COP 6. HUMAN RIGHTS .....	<b>Errore. Il segnalibro non è definito.</b>
COP 11. CORRUPTION AND BRIBERY .....	<b>Errore. Il segnalibro non è definito.</b>
COP 12. KNOW YOUR CUSTOMER (KYC): MONEY LAUNDERING AND TERRORIST FINANCING	<b>Errore. Il segnalibro non è definito.</b>
COP 15-23 DIRITTI DEI LAVORATORI E CONDIZIONI DI LAVORO .....	<b>Errore. Il segnalibro non è definito.</b>
COP 24 HEALTH & SAFETY.....	<b>Errore. Il segnalibro non è definito.</b>
COP 25-28 ENVIRONMENTAL MANAGEMENT.....	<b>Errore. Il segnalibro non è definito.</b>
<b>CONCLUSIONS</b> .....	17

## **SECTION A: GENERAL INFORMATION**

### **A.1) COMPANY PRESENTATION**

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 goldsmithing 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.

In addition, Top Gold has been a certified RJC member since 2016 and obtained RJC COC certification in April 2025.

RJC-COP recertification is planned for 2026 in accordance with the new 2024 standard.

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## **A.2) RJC STRATEGY AND POLICY**

Management has evaluated its policy during the RJC certification process and reviews it annually, with the latest update dated December 2, 2025. This policy is still considered appropriate.

"Quality, timeliness, precision gained through years of experience in the goldsmith sector, flexibility, punctuality, and the 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 ISO 9001 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.

TOP GOLD srl is a member of the Responsible Jewellery Council (RJC) and has been RJC-COP 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 Standards of Practice - COP and the requirements of the RJC CoC (Chain of Custody) Procedure, also in compliance with OECD guidelines, informing our stakeholders (employees, collaborators, suppliers, and customers) about the principles contained therein, disseminating them through the sharing of this Policy and annual reporting on the 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 out in this Company Policy and carries out an annual assessment in accordance with the OECD guidelines and the recommendations contained in the supplement to the OECD guidelines for the gold sector.

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 in practice permitted, tolerated, or not prosecuted.

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 GOLD SRL is not involved in any political donations.

*If TOP GOLD SRL deems it appropriate, it may make charitable contributions or sponsorships, but only in the presence of objective evidence from serious and involved entities, as well as appropriate confirmation 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 will exercise the utmost vigilance over our supply chain. Specifically, for the supply of gold, we use only LBMA-certified gold and do not source from conflict and high-risk areas.*

*To activate the COC chain, we only purchase COC material declared suitable by a COC-certified entity supported by adequate COC documentation. For COC certification, we are committed to complying with the requirements and ensuring internal traceability as defined in a specific operating procedure, issuing the RJC-COC material transfer form to the customer.*

*We undertake to disclose the characteristics of the products we sell in full and in detail.*

*We undertake to take appropriate measures to ensure the integrity and safety of product shipments. We undertake to comply with the principles of confidentiality and protection of confidential data.*

*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 the fundamental human rights and 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 forced, bonded, contract, or prison labor, and to not restricting the freedom of movement of employees and workers.*

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*We are committed to ensuring high health and safety standards at our headquarters and in our business, thanks also to the collaboration of the Occupational Safety Manager and the Workers' Safety Representative.*

*We are committed to basing our working relationships on the principles of equal opportunities and fair treatment, and we will not*

*will we practice or tolerate any form of discrimination in the workplace in terms of hiring,*

*job retention, pay, overtime, access to training, professional development,*

*promotion, dismissal, or retirement, in line with the International Labor Organization's*

*1998 Declaration on Fundamental Principles and Rights at Work. We will ensure that all individuals who are eligible for employment are offered equal opportunities without discrimination based on factors unrelated to their ability to perform the job. We believe that developing diversity and inclusion in our workforce is not only the right thing to do, but also in the best interests of all TOP GOLD srl stakeholders. A diverse workforce translates into a wider range of perspectives, helping to promote excellence in innovation and performance.*

*We are committed to creating a welcoming workplace for people from all backgrounds and to maintaining a culture of inclusiveness and belonging.*

*We are committed to embracing the following principles and behaviors:*

- Recognizing diversity: valuing all people intrinsically, individually and as groups, appreciating how different dimensions of diversity intersect, and recognizing that demographic and other personal characteristics may be protected by law and regulation.*
- working inclusively: enabling and developing an accessible and respectful workplace that promotes inclusion and a sense of belonging;*
- “zero tolerance” for any form of violence against employees, including sexual harassment in any form.*

*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.*

**OECD Policy:**

*We also undertake to use our influence to prevent abuse and to support responsible conduct among our business partners, so that they too observe ethically sustainable business practices that comply with applicable laws and regulations.*

*Regarding serious violations of laws and regulations, we will take appropriate disciplinary action.*

*adhere to ethically sustainable business practices that comply with applicable laws and regulations.*

*With regard to serious abuses associated with the extraction, transportation, and trade of gold*

*We will not tolerate, profit from, or promote:*

- a. torture, cruel, inhuman, and degrading treatment;*
- b. forced or compulsory labor;*
- c. forms of child labor;*
- d. human rights violations and abuses;*
- e. war crimes, violations of international humanitarian law, crimes against humanity, or genocide.*

*Regarding direct or indirect support to non-governmental armed groups*

*We will not tolerate direct or indirect support to non-governmental armed groups, including, but not limited to, the procurement of gold and diamonds, making payments, providing assistance, or supplying equipment to non-governmental armed groups or their affiliates that illegally:*

- a. control mining sites, transport routes, or gold trading points*
- b. tax, extort money, or precious metals at mining sites, along transport routes, or at trading points*

*Regarding active corruption or false declarations about the origin of gold*

*We do not intend to offer, promise, or request bribes, and we intend to oppose the solicitation of bribes, requests to conceal or disguise the origin of gold and diamonds, or to make false declarations regarding taxes, duties, fees, and royalties paid to governments for the purpose of mining, trading, handling, transporting, and exporting gold.*

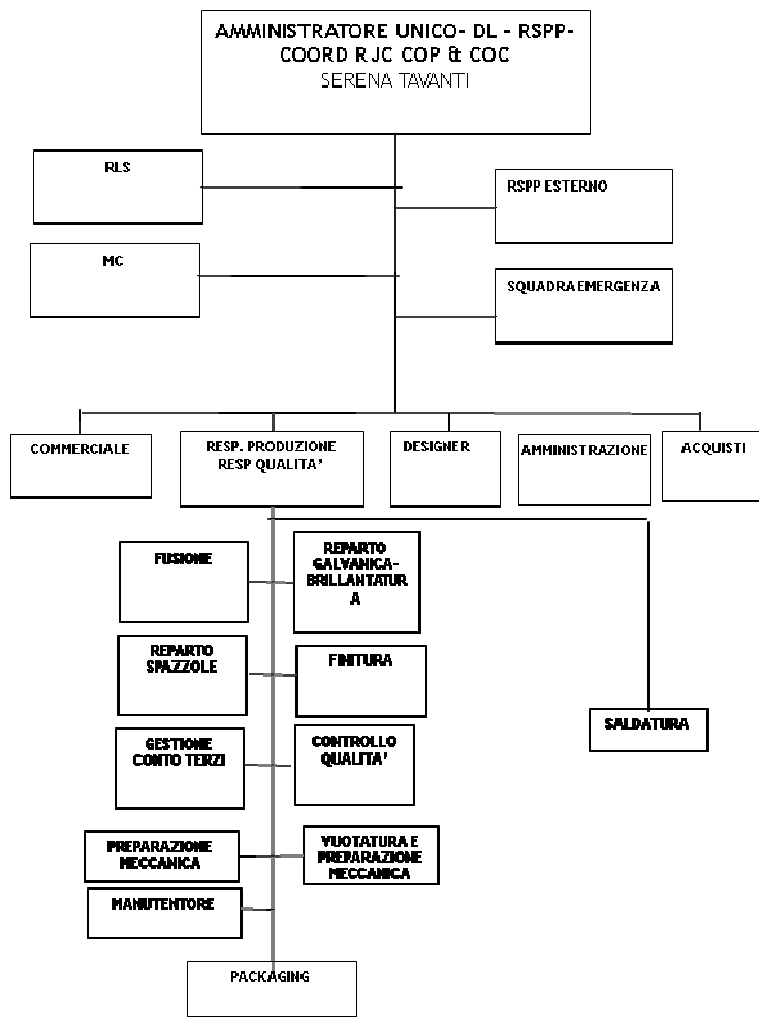
*Regarding money laundering*

*We intend to support efforts and contribute to the effective elimination of money laundering where we identify the risk of money laundering arising from or connected with the extraction, trade, handling, transportation, or export of gold.*

*We will immediately cease all engagement with upstream suppliers if we find that they are engaged in, source from, or are connected to a counterparty that commits the abuses described in this policy.*

### A.3) GOVERNANCE

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



#### A.4) CONVOLUTION OF THE PARTIES INVOLVED

The company has defined its stakeholders and their needs:

Category	SubCategory	Identification of specific stakeholders	What they expect
1) HUMAN RESOURCES	Partners	See Visura	Economic and financial soundness Transparency Effective emergency management Compliance with rules and laws, including by all business partners Compliance with COP 2024 requirements by the entire supply chain (suppliers and customers) Due diligence on business partners - compliance with OECD guidelines
	Employees	List of employees	List of employees Job stability - punctuality in salary payments Compliance with the national collective labor agreement for goldsmiths and silversmiths Healthy and safe environment Clear definition of roles and responsibilities
2) CUSTOMERS	Wholesalers, Retailers	Management software	Timely response in order confirmation Delivery within agreed times Product quality/price Product development in collaboration with the customer Compliance with order fulfillment priorities
3) SUPPLIERS	Precious metal supplier	Management software	payments within agreed timescales Metal fixing Continuity of supply
	Suppliers (materials and services)	Management software	Compliance with agreed payments Clear purchase orders Agreed delivery times Continuity of supply
	Certification body	BUREAU VERITAS ITALIA-DNV	Compliance with mandatory requirements Compliance with RJC-ISO 9001 requirements
	Outsourcing (DIAMOND CUTTING - SATIN FINISHING - ENAMELING)	Management software	Production sheet Agreed delivery times Suitable material for processing Continuity of supply
4) COMPETITORS	COMPETITORS	Not available	Fair competition
5) FINANCIAL PARTNERS	Bank	Management software	Solidity/reliability Quarterly balance sheet Annual balance sheet
	Insurance campaigns	Management software	Installment payments No theft

6) REGULATORY AND INSTITUTIONAL BODIES	SUAP CASENTINO - ARPAM		Compliance with the AUA in force Compliance with mandatory regulations
	INPS/INAIL		Compliance with mandatory regulations
	GUARDIA DI FINANZA		Compliance with mandatory regulations
	TRADE UNIONS	CGL	Compliance with contractual regulations on labor, safety, and infrastructure
7) LOCAL COMMUNITY	Local residents	Municipality of Castelluccio	Respect for the environment Social responsibility
	Other local companies	Municipality of Castelluccio	Respect for the environment Social responsibility

## STAFF

TOP GOLD SRL currently has 47 employees, including 40 permanent employees, 5 fixed-term employees, 1 apprentice, and 1 administrator.

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

Age groups (Years)	18 - 20	20 - 25	26 - 30	More..	Tot
Number	0	3	3	45	51

Seniority in the company (Years)	0 - 2	3 - 4	5- 6	More..	Tot
Number	13	18	8	12	51

## A.5) ETHICS AND SUSTAINABILITY

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. The certification is currently updated to the 2019 edition (C0000 4497 expiring in February 2026).

Recertification with the RJC COP 2024 standard is scheduled for March 2026.

Furthermore, in this context, it obtained RJC COC certification in 2025 (C0000 5874 AS OF APRIL 2025) to guarantee the traceability of the precious metal chain used in the production of its jewelry.

## SECTION B: STANDARD SPECIFIC INFORMATION

### **COP 1 LEGAL COMPLIANCE**

The management of national and international standards, decrees, laws, ordinances, directives, national and local regulations, and international regulations and directives (control, updating, and storage) is entrusted to the Quality Manager, who oversees their management and periodic updating by consulting specific websites, subscribing to trade magazines, or consulting with qualified companies.

The Quality Manager is responsible for maintaining a list of applicable regulations/laws within the company and their status of issuance and updating.

During 2025, there were no concluded and finalized legal proceedings, fines, judgments, financial penalties, or non-financial penalties resulting from non-compliance with applicable law.

### **COP 5 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. 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 Conduct, with the exception of banks, TOP GOLD has prepared a self-certification form for the application of RJC requirements.**

**All suppliers are sent a copy of TOP GOLD's Policy and a self-declaration form confirming their application of the RJC requirements.**

Customer Involved	Policy sharing	Result %
202	202	100%

Supplier involved	Policy sharing	Result %
29	29	100%

## **COP 6. HUMAN RIGHTS**

**TOP GOLD SRL has adopted an approach that includes four key elements:**

- a written company policy;
- a due diligence process;
- a remedy mechanism;
- a communication plan.

The policy is set out in section A.2, has been shared internally with all employees, and published on the website, where it can be viewed by all stakeholders.

Top Gold srl has implemented a human rights due diligence process for suppliers and customers, through the completion of specific questionnaires.

Subsequently, a risk assessment was carried out, which did not highlight any critical issues at the time.

In addition, an internal due diligence was carried out, assessing the following risks:

Potentially affected rightsholders	Human rights at risk	Risk and description, incl. comments on prioritisation factors (severity, likelihood, relationship)	Severity <ul style="list-style-type: none"> <li>• Very high</li> <li>• High</li> <li>• Medium</li> <li>• Low</li> </ul>	Likelihood <ul style="list-style-type: none"> <li>• High</li> <li>• Medium</li> <li>• Low</li> </ul>	Relationship <ul style="list-style-type: none"> <li>• Cause</li> <li>• Contribute</li> <li>• Linked</li> </ul>	Priority <i>[assign a numerical or qualitative value]</i>
Children	No child labour	Children working in artisanal mine; Child labour has been reported to company	Very high	High	Linkage	
dipendenti	no re di straordinario che eccedono le 40 ore	in azienda non ci sono straordinari sono eccezionali	medium	low	cause	0
dipendenti	condizioni di lavoro non sicure e giuste	applicazione delle norme 81/08- monitoraggio incidenti e quasi incidenti	high	low	contribute	0
migranti	no lavoro forzato	verifica delle scadenze dei permessi di soggiorno- nessun documento trattenuto in	high	low	linked	0
dipendenti	violazione diritto alla privacy	adempimento normativa GDPR	medium	low	cause	0
dipendenti	no libertà di associazione	modalità segnalazione di atti discriminatori- nolicv aziendale- attualmente 2 iscritti al	medium	low	cause	0
dipendenti	no retribuzione equa	applicazione del CCNL orafi e argenterii	very high	low	cause	0
dipendenti	discriminazione	modalità segnalazione di atti discriminatori- nolicv aziendale	medium	low	contribute	0

No critical issues emerged.

## COP 11. CORRUPTION AND BRIBERY

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 its internal staff involved in this issue through training sessions.

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

At the legislative level, TOP GOLD SRL operates in compliance with the regulatory framework 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.

TOP GOLD SRL has carried out due diligence on its business partners in order to verify any deviations from the OECD guidelines and, furthermore, no human rights risks have been identified. The transactions considered are low risk and the checks carried out comply with RJC principles.

Furthermore, TOP GOLD SRL is committed to supporting responsible conduct throughout its sector's supply chain, ensuring that its business partners (suppliers and/or subcontractors) also observe ethically sustainable business practices that comply with applicable laws and regulations, and guaranteeing the correct implementation of “Due diligence for responsible sourcing from conflict-affected and high-risk areas,” in accordance with the requirements of RJC COP 2024, point 7, and the OECD Guidance, Step 5

**COP 15-23 WORKERS' RIGHTS AND WORKING CONDITIONS**

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

Types of contracts:

	Tot	Permanent	Fixed Term	Apprentices	Agency
Male	36	34	2	0	0
Female	15	14	1	0	0

Provenience	Number of employees
Municipality and Province of Arezzo	51
Other provinces in the region of Tuscany	0
Other provinces in Italy	0

FOREIGN NATIONALITY	Number of employees
BANGALDESH	7
PAKISTAN	10
INDIA	3
ROMANIA	2
MACEDONIA	1

No disciplinary sanctions were imposed in 2025.

In 2025, there are 8 migrants with temporary residence permits.

Employees can 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. They have a box available for reports, which is checked periodically by RJC Coord. In 2025, no reports were received.

Furthermore, even those who left the company due to resignation did not report situations of discrimination among their reasons.

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.

There is currently a CGL trade union, but no employees are trade union representatives.

## **COP 24 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 2025, TOP GOLD SRL carried out the following actions:

- Updating of safety documents.

- Training in accordance with regional regulations for new hires.
- Medical examinations.
- Evacuation drill.
- Periodic meeting pursuant to Article 35.

**COP 25-28 ENVIRONMENTAL MANAGEMENT**

TOP GOLD SRL 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 use of prohibited substances
- Incorrect waste management

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

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

Special training on environmental issues (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:

risorsa	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
acqua mq	443,00	299,00	373,00	393,00	611,00	446,00	668,00	1603	1040	1522	1136
gas smc	6.403,00	5.325,00	5.452,00	4.790,00	5.031,00	4.120,00	6.246,00	6371	5129	3687	3073
energia elettrica Kwh	355.072,00	439.826,00	464.809,00	464.157,00	459.136,00	358.941,00	433.222,00	544603	595461	639500	644029

**Sustainable Development Goals (SDGs) for the year 2026**

In 2026, asbestos will be removed from the roof and a photovoltaic system will be installed.

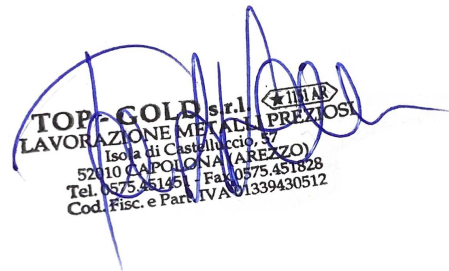

## CONCLUSIONS

### 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 concrete actions and facts, consistent with its 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 and the gold market.

*Serena Tavanti*  
**TOP GOLD SRL**

  
**TOP GOLD s.r.l.**   
**LAVORAZIONE METALLI PREZIOSI**  
Isola di Castiglione, 37  
52010 CAPOLONA (AREZZO)  
Tel. 0575 451451 - Fax 0575 451828  
Cod. Fisc. e Part. IVA 01339430512