



### Contact Information

COMPANY NAME: *Piero Nutini snc*  
DATE: *10/02/2026*  
REPORTING PERIOD: *01/01/2025 – 31/12/2025*  
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### COMPANY MANAGEMENT SYSTEMS

**Piero Nutini snc** has the following policies in place:

- *Company Policy rev.1 dated 19/01/2026*
- *Disciplinary and Conduct code rev.0 dated 19/01/2026*

These policies have been reviewed during this Annual Report and have been approved.

The Company Policy contains the commitment of **Piero Nutini snc** regarding:

- Human Rights and Social Policy
- Commercial, Anti-Corruption, Anti-Extortion and Anti-Money Laundering
- Environmental respect
- Occupational Health, Safety and Hygiene
- Security

Our policies detail our commitment to respect human rights throughout our supply chain and our supply chain due diligence regarding *gold* and *silver*.

**Piero Nutini snc** endorses the *Company Policy* to its suppliers and stakeholders by distributing them via website link <https://www.pieronutinisnc.com/pag/azienda.php> or e-mail by request; this policy can also be accessed by our internal stakeholders via notice boards where all communications are present.

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

- *Suppliers Risk Assessment*
- *Supply chain Policy DOC02 rev.0 dated 19/01/2026*
- *RJC Manual rev.0 dated 07/01/2026*
- *Annual Reporting*

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

To aid us in identifying our human rights impacts we have implemented the *Human Rights Due Diligence* And a *Human rights risks evaluation*

During this analysis no **HIGH** risks have been detected



The senior manager responsible for overseeing our human rights impacts is Fabrizio Nutini as *RJC Responsible*.

**Piero Nutini snc** has established a system of controls and transparency over its supply chain, which include its approach for identifying suppliers and identifying sources of our precious metal materials; all precious metal materials suppliers are listed in our *Risk Assessment* where it is identified:

- Supplier name
- Supplier addresses
- Forniture
- Certifications
- Risk level

During the past year no audits were carried out at subcontractors

NR SUPPLIERS (for precious metals)	2
NR SUPPLIERS CERTIFIED RJC COP, LBMA or banks	2
NR REFINERS	1
NR REFINERS CERTIFIED RJC COP or LBMA	1
NR SUBCONTRACTORS	6
NR SUBCONTRACTORS CERTIFIED (RJC, LBMA, etc...)	5
NR AUDIT TO SUBCONTRACTORS	0
NR OF LOW RISK LEVEL SUPPLIERS AND SUBCONTRACTORS	7
NR OF MEDIUM RISK LEVEL SUPPLIERS AND SUBCONTRACTORS	1
NR OF HIGH RISK LEVEL SUPPLIERS AND SUBCONTRACTORS	0

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

- Geographyc location of the supplier
- Company certifications (RJC, LBMA, SA800, ....)
- Document of legal representative
- Company registration report
- KYC documentation

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

- *Subcontractor commitment MOD02*
- *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 *Company Policy* and our *Subcontractor commitment* to be signed.

In addition to this, when needed, we also take an audit to strengthen our engagement with suppliers; the outcome of doing so has been very positive, all our suppliers are RJC certified and accepted our policies; the risk of our supply chain is **LOW**.



Our grievance mechanism for internal and external stakeholders can be accessed via website

<https://www.pieronutinisnc.com/pag/azienda.php>

Till today no grievances have been received. The responsible for these grievance mechanisms is Fabrizio Nutini appointed for the purpose.

### IDENTIFIED & ASSESSED RISKS

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

- *Human Rights Due Diligence*
- *Suppliers Evaluation Risks*

During our assessment of our own and our supplier's due diligence practices and those relating to human rights, we have identified **no HIGH potential and actual risks within our supply chain.**

In the reporting period, **Piero Nutini snc** had no complaints or reports cases of corruption cases involving its own personnel or personnel of its suppliers, as well as continues not to make use of facilitating payments;

**Piero Nutini snc** had neither complaints or reports cases of money laundering and terrorist financing, including through the analyses of auditing bodies and banks.

The Management confirms the *Company Policy DOC02* integrated with *Anti-Corruption Policy*

### STRATEGY

Our risk assessment findings are received by Fabrizio Nutini as *RJC Responsible*.

To respond to eventual risks identified within our supply chain, we use our Risk Management Plan as described in our system procedures. Our risk management plan consists of:

- Risks Identification
- Processes involved
- Stakeholders
- Root causes analysis
- Consequences
- Risks evaluation (Probability x Severity)
- Strategy to respond to the risks and impacts identified
- Timescales
- Action taken

**Piero Nutini snc** will provide the training regarding human rights to its employees within July; this training includes information on:

- Voluntary standards RJC-COP-2024 and RJC-CoC-2024
- Procedure for managing CoC material (identification, traceability and treatment systems)

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- Responsible supply chain and KYC
- DOC06 Reporting methods (Grievance Mechanism)
- Recognising to prevent harassment and violence in the workplace
- Diversity, inclusivity and equity
- Health, safety and environment
- DOC01 RJC COP Management System Manual
- DOC05 CoC material management manual
- DOC02 Company policy:
  - o Social and respect for human rights
  - o Commercial, Anti-Corruption, Anti-Extortion and Anti-Money Laundering
  - o Environmental
  - o Health, Safety and Hygiene at Work
  - o Security

### HEALTH AND SAFETY MANAGEMENT SYSTEM

**Piero Nutini snc** periodically reviews its Health and Safety Management System through regular meetings with the Head of the Prevention and Protection Service (RSPP), the Workers' Safety Representative (RLS), the Employer (DL) and the Competent Doctor (MC); report of these meetings are recorded in a special report kept in the Administration Office; last annual meeting report is dated 05/11/2025.

The emergency management system is also tested annually with an evacuation drill; the last one was successfully carried out on 23/12/2025.

Below are the figures for the reference year:

INFORTUNES	0
ACCIDENTS	0
OCCUPATIONAL DISEASES	0
WORKERS FOUND UNSUITABLE FOR THE JOB	0
FIRST AID OFFICERS	2
FIRE PREVENTION OFFICERS	2
CHEMICALS REPLACED WITH LESS HAZARDOUS ONES	0

All workers underwent a medical examination to assess their fitness for work and received the training required by law (Legislative Decree 81/08).

Personal protective equipment (PPE) was distributed to all staff and whenever requested.

The company's health and safety documentation and the Risk Assessment Document (DVR) are up to date (12/12/2023).



During the reference period, no less hazardous alternative chemicals were identified; therefore, the list of chemicals in the DVR is confirmed.

No corrective or improvement actions are required, the possibility of less hazardous alternative chemicals will continue to be evaluated

## SISTEMA DI GESTIONE AMBIENTALE

**Piero Nutini snc** has assessed its environmental impact using the **REG06 Environmental Aspects and Impacts** register and declares its commitment to environmental protection within its **DOC01 Company Policy**. The company constantly measures its energy consumption and records it in the **REG07 consumption calculation** file.

All waste produced was recorded on the online portal of the RENTRI state system, thus ensuring it was properly tracked and identified.

Analysis of **REG06 Environmental Aspects and Impacts** and **REG07 consumption calculation** does not reveal any critical situations to be addressed.

For the current year, we propose to replace the current electricity supplier with another that provides energy obtained from 100% renewable sources.

Following, environmental indicators regarding the referred period

ELECTRICITY (kWh)	32699
METHANE GAS (mc)	1061
WATER (mc)	230
HAZARDOUS WASTE (kg)	41,5
NON-HAZARDOUS WASTE (kg)	134,4
<b>LOW ENVIRONMENTAL IMPACT ASPECTS</b>	12
<b>MEDIUM ENVIRONMENTAL IMPACT ASPECTS</b>	0
<b>HIGH ENVIRONMENTAL IMPACT ASPECTS</b>	0

**Piero Nutini snc** communicates to its stakeholders regarding its due diligence activities and efforts to prevent human rights risks. This communication is in the form of *Annual Report* published on the website link <https://www.pieronutinisnc.com/pag/azienda.php>

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

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**Piero Nutini snc** has joined the RJC in March 2022 and will achieved the COP and CoC 2024 certification within the year 2026. The third part audit is booked for the end of February 2026.