

# **RJC Code of Practices 2024 - Reporting**

**STILNOVO SRL**

## Contact Information

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This report has been prepared in accordance with the RJC Code of Practices (COP) 2024, covering key areas including business ethics, human rights, supply chain due diligence, environmental management and governance systems.

## ACTIONS

Stilnovo Srl adopts responsible policies on all the matters related to human rights, child labour, hazardous substances, gender equality, wastes and emissions management; The company also obtained PDR 125 Certification in December 2023. Starting from 2026, Stilnovo Srl has formally adopted an Organizational, Management and Control Model pursuant to Italian Legislative Decree 231/2001, aimed at preventing corporate liability risks and strengthening the company's governance, compliance framework and internal control system. These policies can be found on the company's website and have also been shared with partner firms.

The company is committed to continuous improvement of its management systems in line with the RJC COP 2024 requirements. The Model 231 further strengthens the company's internal control system, ethical conduct and risk prevention framework.

The actions concerning the matters above have been taken not only through constant monitoring and training of the employees, but also:

- yearly meetings aimed at sharing all the information with the staff;
- moving to a new bigger site built with modern materials and attention to energy saving to facilitate the well-being of workers and improve the cooperation between people and the creation of human relationships binding the team;
- maintaining the certification PDR125:2022 related to human resources management and inclusion

The outcome of these actions has been a more conscious staff on all the important matters, cut of the wastes and related optimization of the internal company processes. We also expect further improvements due to an always more conscious approach to the entire process.

In line with the RJC COP 2024 requirements, Stilnovo Srl adopts a risk-based approach to human rights and supply chain due diligence, ensuring alignment with OECD Due Diligence Guidance and internationally recognized standards.

Concerning the supply chain of the company, Stilnovo Srl follows the important policy of not buying from conflict-affected and high-risk areas the following precious metals and minerals: gold, silver, diamonds, rubies and sapphires. This policy is communicated by e-mail at the beginning of each working relationship and can be read also on the company's website.

To support the supply chain due diligence, we have implemented internal measures related to the submission of the due diligence for all the suppliers from which the company buys precious materials. The Total Quality Manager responsible for overseeing this process is Cristina Massobrio

Stilnovo Srl has established a system of control and transparency over the supply chain, which includes identifying all the suppliers and verify, along their due diligence policy, their reputation in the area and their certifications (our gold and alloy suppliers are few and all RJC members). We also collect references from our clients. These methods have strengthened our due diligence efforts by assuring ourselves and our clients about the integrity of our sources.

As a company, we communicate our expectations regarding human rights and the supply chain's due diligence by e-mail, in person meetings and on-line professional meetings. In addition, to strengthen our commitment to suppliers, we also take the following measures : help them with the external audits executed by accredited entities so we can prove our integrity and all our efforts to maintain the supply chain management. By doing so, the outcome has been the establishment of very long-term relationships with the majority of both our suppliers and clients.

We have also a grievance mechanism for internal and external stakeholders, which can be accessed also in an anonymous way, so that everyone can feel free to submit the complaint but also suggest a possible resolution without the fear of negative consequences. The management will examine the report, possibly establish a time frame for the resolution and verify the process till its conclusion. Our external grievance mechanism, instead, is shared between authorized employees studying the problem and the best way to solve it. Also on the company web site is also available a mail address [sis@stilnovo-srl.com](mailto:sis@stilnovo-srl.com) and a Whistleblowing Link where every stakeholder can write any reports relating violations and will be treated in accordance with the regulations for the reporting system

## IDENTIFIED & ASSESSED RISKS

We adopt a risk-based approach and constantly assess our own and the suppliers' due diligence practices, such as those related to human rights.

If, during the assessment described above, we identify potential or actual risks within our supply chain, we would take immediate action: take note of the event in order to grant documentary evidence of the incident and assess the related most appropriate corrective actions.

## STRATEGY

The results of our risk assessment process are then received by the senior manager (CEO) Maria Grazia Malagoli.

In order to respond to the risks identified within our supply chain, we took the following steps to design and implement a risk management plan: maintain throughout the years close relationships with a limited number of trusted suppliers, follow the same procedure already explained for the grievance management mechanism

To implement our risk management plan we have followed the risk mitigation steps with the same few certified suppliers with which we have a very close relationship: collect all the information about the due diligence, continue to monitor the plan and track the effectiveness of the risk mitigation measures by asking frequently to confirm what they have already submitted.

Stilnovo Srl provides employees with ongoing training and awareness activities on human rights, Code of Conduct and Code of Practices requirements. These initiatives are carried out throughout the year through a combination of small group sessions and plenary meetings, depending on operational needs.

Information is also shared through company notice boards and in-person sessions, some of which are delivered with the support of external professionals. This approach aims to continuously engage employees, strengthen awareness and promote a solid company culture aligned with responsible business practices across all areas of the standard.

Stilnovo Srl communicates information to the stakeholders regarding due diligence activities in form of e-mail, visit to the suppliers, phone calls and on line professional meetings.

Since our last report no grievance has been raised regarding human rights' risks or our supply chain due diligence.

### **CARRY OUT A THIRD PARTY AUDIT**

In 2025, Stilnovo Srl successfully renewed its RJC certification, transitioning to the updated Code of Practices 2024 standard, confirming its ongoing commitment to responsible business practices and continuous improvement.