

ANNUAL REPORT ON SUPPLY DUE DILIGENCE

In compliance with the Responsible Jewellery Council's Code of Practices (COP RJC), Bluclad S.p.A. (RJC member) continues its commitment to ensuring ethical and responsible practices throughout its supply chain. This report highlights our efforts and achievements in maintaining transparency and accountability in the sourcing and processing of minerals, particularly gold, palladium, and platinum.

In the table below we report the kg of material that is use in the production:

Source /Type of material	Gold	Silver	Rhodium	Palladium	Platinum
Mined	-	-	-	-	-
Recycled	73,5	-	2,9	87	12
Grandfathered	-	-	-	-	-
Mixed	-	-	-	-	-

Policy Implementation

Bluclad S.p.A. has established a comprehensive policy addressing due diligence for the supply chain of salt and compounds containing gold, palladium, and platinum. The policy, effective from March 1, 2023, is publicly available on the Bluclad website. Mr. Lorenzo Cavaciocchi has been appointed as the accountable person for implementing due diligence, alongside a designated compliance officer. Robust internal and external communication mechanisms have been established to ensure adherence to this policy.

Supplier Evaluation and Acceptance

A meticulous procedure has been instituted to evaluate and accept suppliers and customers, ensuring alignment with our ethical standards and commitment to responsible mineral sourcing.

Supply Chain Compliance

Bluclad S.p.A. mandates that its suppliers adhere to a supply chain policy compliant with the OECD Due Diligence Guidance. To achieve this, we:

- Foster long-term supplier relationships to enhance oversight and accountability.
- Source conflict-free gold exclusively from refiners or banks listed on the LBMA Good Delivery List.
- Ensure conflict-free precious metals are traceable from RJC chain-accredited enterprises or recycled sources meeting OECD regulations on KYC and Due Diligence.
- Clearly communicate expectations regarding responsible mineral supply chains to our suppliers and integrate our Company Policy and Ethical Code into commercial contracts.

BLUCLAD® S.p.A.

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Risk Assessment and Mitigation

Utilizing the RJC Risk Assessment Toolkit, Bluclad S.p.A. conducted thorough risk assessments across its supply chain. Identified risks were categorized as low or moderate, and mitigation strategies were implemented. These strategies include:

- Communication of policies and ethical standards to internal and external stakeholders.
- Integration of procedures within our integrated management system.
- Clear definition of roles, responsibilities, and accountability within the organization.
- Establishment of robust record-keeping procedures.
- Ongoing personnel training to uphold standards.

Third-Party Audit and Compliance Management

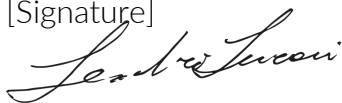
To ensure the effectiveness of our due diligence efforts, Bluclad S.p.A. has commissioned an impartial third-party audit conducted by Bureau Veritas Italia SPA. Any complaints regarding human rights breaches are diligently tracked, examined, and managed in accordance with our non-compliance management procedure. It is worth noting that in 2023, no claims regarding human rights violations were received, demonstrating the efficacy of our proactive approach.

Conclusion

Bluclad S.p.A. remains steadfast in its commitment to responsible sourcing and supply chain management. By adhering to stringent policies, conducting thorough assessments, and engaging with stakeholders, we aim to uphold the highest ethical standards in our operations. We will continue to evolve our practices to meet the evolving challenges of responsible mineral sourcing and contribute positively to the industry and communities we serve.

For more detailed information, please refer to our full report available on our website.

[Signature]



Bluclad S.p.A. Management Team

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