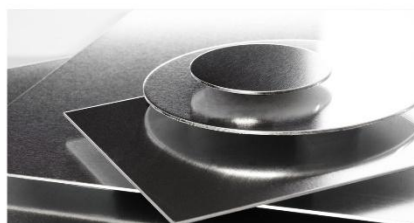
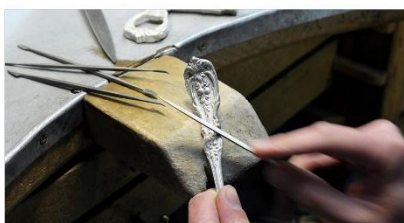




**LA.MET Ag**  
YOUR SILVER SPECIALIST

**GREGGIO**  
THE ITALIAN SILVER TRADITION

**argex**  
SILVER PRODUCTS



# REPORT OF SUSTAINABILITY

YEAR - 2022

Developed according to the UN 2030 AGENDA PRINCIPLES, GRI INDICES

REPORT.rev.00\_2022

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# 1. GENERAL CONSIDERATIONS

## 1.1 DESCRIPTION

The Sustainability Report and Review is a public information document on the social and environmental effects of GREGGIO GROUP's activities and provides a report on the company's actions and future initiatives, has an annual drafting periodicity and reports the values, situation and objectives of GREGGIO GROUP in the field of social and ethical relations.

The document is drawn up by the Company's Management, in collaboration with the other members of the Sustainability Team, in accordance with the requirements of the UN 2030 Agenda and the indicators of the Global Reporting Initiative (GRI) used as guidelines to address these aspects in a systematic way.

The document includes both the Corporate Sustainability Policy and the Management Review, aimed at defining, verifying, correcting and improving the company's commitment to sustainability.

The Sustainability Report and Review, in fact, has a dual value:

- it is a management tool for the Management as it measures its Social Responsibility and Sustainability Policy and the other policies and procedures adopted to achieve corporate sustainability and to improve it over time;
- It is a means of communication because it informs and collects information from stakeholders who, in this way, participate in the conduct of the company. This document is made available to all company personnel through the intranet and to all external interested parties through the website: [www.greggio.com](http://www.greggio.com)

## 1.2 RECIPIENTS

The Sustainability Report and Review is aimed at entities that have significant relationships with GREGGIO GROUP and in particular to:

- ✓ COMPANY STAFF;
- ✓ EMPLOYEES;
- ✓ CUSTOMERS;
- ✓ BUSINESS PARTNERS;
- ✓ LOCAL COMMUNITY;
- ✓ SUPPLIERS;
- ✓ CONTRACTORS;
- ✓ TRADE UNIONS.



The company asks these parties to participate, directly or indirectly, in this common commitment to protect the environment and the protection of fundamental human rights.

### 1.3 OBJECTIVES

The objective of the Sustainability Report and Review is to provide a report on the initiatives developed by GREGGIO GROUP and to communicate, in a clear and transparent manner to all interested parties, the results achieved in the field of social responsibility and sustainability.

More specifically, the Sustainability Report and Review aims to:



- 01 Evaluate ethical values**, social commitments, principles and rules of reference, with a view to continuous improvement.
- 02 Provide information** on the social effects that arise from societal choices.
- 03 Foster dialogue**, involvement and consensus of stakeholders.
- 04 Fully implement** the Sustainability System (also through certification)

### 1.4 REGULATORY ELEMENTS

Your organization must comply with local, national, and other applicable laws, prevailing industry standards, other requirements to which your organization adheres, and this Standard. When such laws, rules or other requirements to which the organization adheres and the Standard relate to the same subject, the provision that is most favourable to the workers shall be applied. The organization must also comply with the principles of the following international instruments:

- RJC COP 2019 Standard
- National Regulations on Occupational Health and Safety
- Privacy Laws
- National Labour Law Laws
- National and international regulations on anti-corruption and anti-money laundering
- ILO Convention 1 (Working Hours – Industry and ) and Recommendation 116 (Reduction of Working Hours)
- ILO Conventions 29 (Forced Labour) and 105 (Abolition of Forced Labour)
- ILO Convention 87 (Freedom of Association and Protection of the Right to Organize)
- ILO Convention 98 (Right to Organise and Collective Bargaining)
- ILO Conventions 100 (Equal Pay) and E 111 (Discrimination – Employment and Occupation)
- ILO Convention 102 (Social Security – Minimum Standards)
- ILO Convention 131 (Definition of the Minimum Wage)
- ILO Convention 135 (Workers' Representatives)
- ILO Convention 138 and Recommendation 146 (Minimum Age)
- ILO Convention 155 and Recommendation 164 (Occupational Safety and Health)
- ILO Convention 159 (Occupational and reintegration - persons with disabilities)
- ILO Convention 169 (Indigenous and Tribal Peoples)
- ILO Convention 177 (Home Working)
- ILO Convention 181 (Private Employment Agencies)
- ILO Convention 182 (Worst Forms of Child Labour)
- ILO Convention 183 (Maternity Protection)
- ILO Code of Conduct on HIV/AIDS and the World of Work
- Universal Declaration of Human Rights
- International Covenant on Economic, Social and Cultural Rights
- International Covenant on Civil and Political Rights
- United Nations Convention on the Rights of the Child
- United Nations Convention on the Elimination of All Forms of Discrimination against Women
- United Nations Convention on the Elimination of All Forms of Racial Discrimination
- United Nations Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises

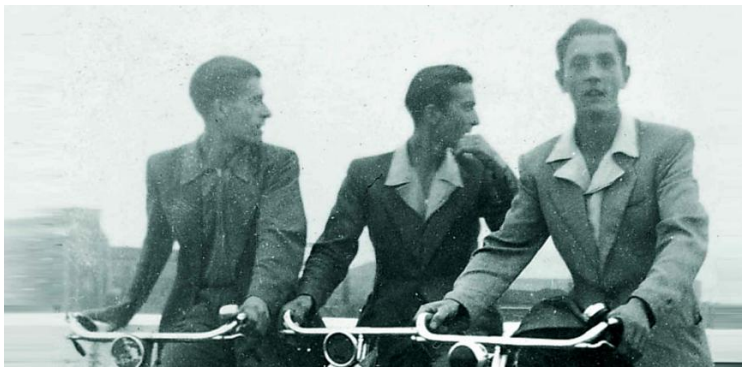
## 2. GREGGIO GROUP PROFILE

### THE BEGINNING

"When I was 14 I entered the workshop of a Paduan silversmith as an apprentice. Here I learned the secrets of this ancient craft, understanding that it would be my life's work. After the war, with the 21 lire I earned from the sale of my bicycle, I purchased my first kilo of silver."

It's been a while, I've come a long way from that first small room measuring 4x4 meters; today Greggio Group International has become an important Group, a reference point for the world of silver".

*Rino Greggio*



Argenterie RINO GREGGIO  
VIA TAGLIAMENTO, 5 — TEL. 07.131-07.254  
C.P. 35030 TENCAROLA (PADOVA) - ITALY



That's how in 1948 Rino Greggio Argenterie was born in Padua.

The company's first phase of strong growth began in the 1960s, when Greggio developed the cutlery collections and the first large factory was born.

In those years it was possible to expand the commercial area, which

until then was limited to the Northern Italy area, to cover the entire country.

In 1968, now with many years of experience and expertise in the production of silver, Rino Greggio founded the Olri brand, which has now become Greggio Lega Argentata, an absolute leader in the production and distribution of high thickness silver alloy objects for the home, the table and other accessories. In particular, tableware objects have professional features and are therefore very functional, suitable for frequent use because they are treated for a long time.

In 1974 it began to expand internationally, becoming one of the main silversmith groups in the production of cutlery and household items.

1985 marks another important stage for the Greggio Group with the creation of an internal research and development laboratory which allows it to choose and analyze new materials to combine with silver, new types of craftsmanship and study innovative lines in order to satisfy the needs of the final consumer.

In 1990 Greggio entered with its own corner at Harrods, a popular department store recognized as the excellence of luxury throughout the world.

In 1994 Rino Greggio founded "L'Accademia dell'Argento" with the aim of developing but also preserving the history, traditions and philosophy of "living silver".

In 1995 the historic brands "Cesa 1882" and "Ricci Argentieri" became part of the Greggio family which continued production and distribution to exclusive dealers.

In 2004 Greggio created "Dogale Venezia", a line of hand-decorated and silvered glass products, continuing and once again enhancing Made in Italy production and craftsmanship.

Each piece is different from another because it is shaped and finished by the precious hands of expert Italian craftsmen.

In 2010, the well-known Florentine brand "Masini Firenze" became part of the Greggio Group with the aim of further diversifying the offer.

Tradition and quality have therefore always remained fundamental pillars in Greggio, and from this union the Royal Collection was born in 2013, an exclusive line with particular attention to detail.

Greggio Group International is made up of three companies: Rino Greggio Argenterie, described above, La.met Spa and Argex ltd.



The Greggio Group establishes La.Met S.p.A. at the beginning of the 90s as a production division for the manufacture of semi-finished silver products for the gold and silversmith sector; it is



located on the outskirts of Padua and it is today recognized as a leader in the production of plates, strips, wires, anodes and many other semi-finished silver products.

In 2011 La.Met Spa registered a new commercial brand "AgTech" which identifies the production of semi-finished silver products for the industrial sector.

La.Met. also offers a service for the recovery and refining of silver scraps of all kinds.

Argex Ltd, founded in 1994, is a company located in Birmingham that develops commercial activities in England through the distribution and sale of semi-finished silver products.

Today the company is directed by the founder's children, who have continued their father's business by facing the challenges and opportunities of the present. These include obtaining the RJC COP certification for the entire group, aware that respect for the principles of sustainability is an essential element to guarantee

our future, aiming for maximum customer satisfaction in compliance with the specifications requested by each one.



## INNOVATION

The GREGGIO GROUP constantly aims to seek new solutions in line with the principles of sustainability. Encouraging the circular economy, through the use of **recycled** raw materials, reducing waste and respecting the environment and human beings are the essential elements for planning our future.

## TEAM

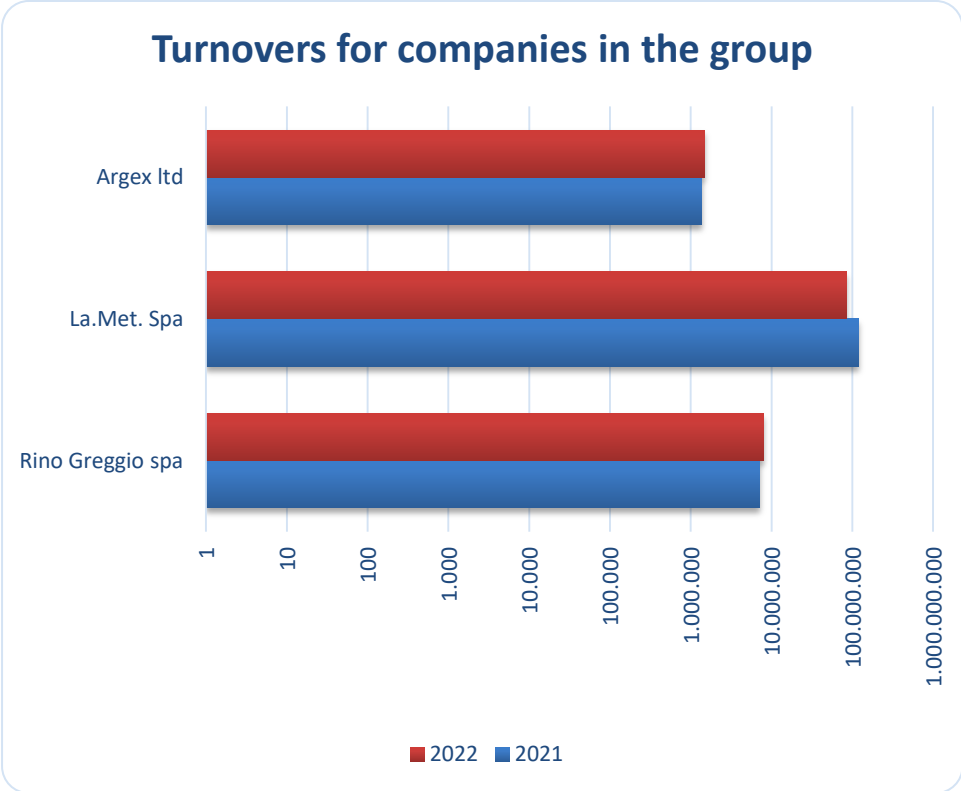
The team work stands from everyone's commitment, the sharing of skills and the ability to face the challenges of the market together.

The essence of success is working for the common good, because the company is a community of people who collaborate to achieve everyone's well-being. Thus the GREGGIO GROUP presents itself as a group of people united by a single thought linked to sustainability and social responsibility and by the ability to best interpret the needs of its customers.

2.1 CORPORATE GOVERNANCE

The company is owned by the Greggio family.

The share capital of Rino Greggio Argenterie Spa is equal to 10,330,000 euros fully paid up  
The share capital of La.Met Spa is equal to 4,000,000 euros fully paid up.



To the side the turnovers of the 3 companies in the group in 2021 and 2022.



## 2.2 ORGANIZATIONAL STRUCTURE AND RESPONSIBILITY

In the company management system there are teams and committees with the task of monitoring company processes, promoting the improvement of sustainability, acting promptly if necessary, supporting and stimulating the organization in the application of ethical principles.



## 2.2 SUSTAINABILITY TEAM

The sustainability team is made up of management representatives and worker representatives.

The main responsibilities regarding the Sustainability System are summarized below:

The sustainability team is made up of management representatives and employee representatives. The main responsibilities with regard to the Sustainability System are summarised below:

### RESPONSIBLE FOR THE SUSTAINABILITY SYSTEM

- Is responsible for compliance with sustainability standards and principles
- Defines and approves the Company Policy
- Presides over the management review in order to verify the adequacy and effectiveness of the System Policy to define the improvement actions to be implemented
- Approves the Sustainability Report and Review
- He is responsible for the implementation and monitoring of the Sustainability System with the collaboration of the other members of the sustainability team
- Prepares the Sustainability Report and Review with the collaboration of the other members of the sustainability team and any stakeholders.



### Sustainability TEAM

- Collaborates with Senior Management for the correct application of the Sustainability System
- It facilitates communication between workers and management as it includes their representatives who therefore play a role as direct spokespersons
- Identify and assess risks by prioritizing areas with the greatest potential for non-compliance with the Sustainability Standard
- It carries out activities monitoring activities in the workplace to keep under control:
  - a) compliance with ethical and sustainability standards and codes
  - (b) the implementation of planned actions to address the risks identified by the sustainability team
  - c) the effectiveness of the methods adopted to meet the organization's policies and the requirements of the standard
- Participates in the preparation of the Sustainability Report and Review
- Ensures the application of the actions put in place for the resolution of non-conformities and the implementation of corrective and preventive actions
- Participate in the development of the training plan
- He is responsible for relations with the Certification Body
- He is responsible for relations with interested parties.



## 2.2 CORPORATE SUSTAINABILITY POLICY

GREGGIO GROUP has therefore decided to develop and apply a Sustainability System consistent with the principles of the UN 2030 Agenda, the RJC COP standards and the GRI indicators.

To this end, the company undertakes to adhere to and comply with:

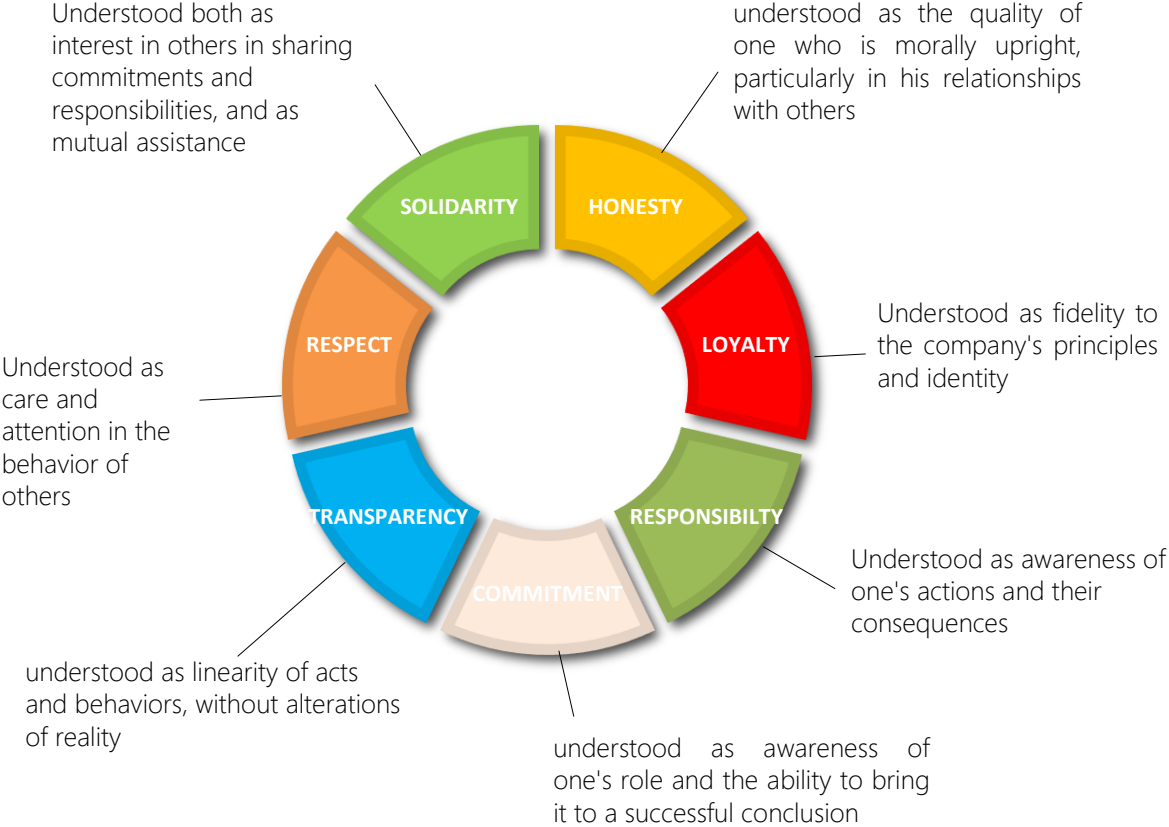
- to all requirements of the RJC COP standard
- International Labour Organization (ILO) Conventions
- the United Nations Convention on the Rights of the Child
- the Universal Declaration of Human Rights
- all national regulations on health and safety, environment, labour law
- all national and international regulations on legality, anti-corruption and anti-money laundering
- the United Nations Convention on the Elimination of All Forms of Discrimination against Women and All Forms of Racial Discrimination
- the International Covenant on Civil and Political Rights and on Economic, Social and Cultural Rights.

The general objectives that the company intends to achieve and maintain are:

- The prevention of situations detrimental to the rights of the individual
- Increasing the efficiency of its organizational structure and supply chain
- The dissemination of a culture of social responsibility through a permanent process of training, involvement and empowerment of staff
- Rationalisation of the structure and procedures with a clear and balanced definition of tasks and responsibilities
- The establishment of a stimulating and rewarding corporate climate for the professional growth of staff
- Participation and contribution to solidarity/social initiatives
- Commitment to disseminate sustainability principles to all stakeholders
- Participation in the development of a circular economy
- The company is committed to compliance with the principles set out in the Sustainability System and, in carrying out its activities, requires its employees/collaborators/suppliers to comply with the regulatory requirements regarding:
  - Child and child labour
  - Voluntary Employment
  - Health & Safety
  - Freedom of association and the right to collective bargaining
  - Discrimination
  - Disciplinary Practices
  - Working Hours
  - Pay
  - Respect and attention to the environment
  - Anti-corruption
  - Legality / fight against fraud

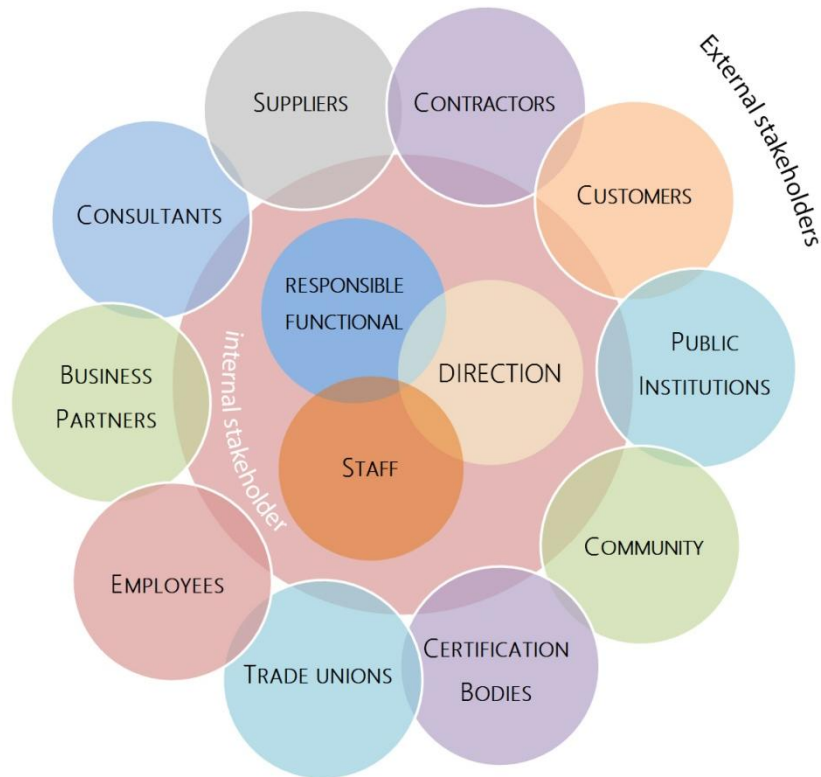
2.3 VALUES

The GREGGIO GROUP, therefore, recognizes as fundamental the human values primarily represented by:



# 4. STAKEHOLDERS

The stakeholders identified in GREGGIO GROUP'S social responsibility system can be divided into two different groups: internal and external stakeholders.



Each group has a different set of expectations, needs, needs and interests with the company.

Generally:

With regard to internal stakeholders, sustainability manifests itself and is affirmed in ensuring compliance with the rules, in mutual involvement and trust, in a corporate climate suitable for promoting the greatest possible protection of employees and collaborators, in the desire to encourage the growth of everyone's skills by generating satisfaction for each for their own needs and aspirations.

With respect to external stakeholders, sustainability is expressed in a varied way and in relation to the roles that each of them assumes and which can be summarized in the awareness of interacting with a company whose attention to sustainability is manifest, certified by independent bodies and also made explicit through this management review.

Especially:

## **COMPANY MANAGEMENT**

The ethical requirement is to produce profit and business growth without compromising its sustainability, through the non-respect of the rights of the resources used (human and environmental), as well as to produce and create benefit from the dissemination of the ethical principles that support it.

### How to Satisfy

Seek to increase profits through the identification of a business that is increasingly attentive to sustainability, generating the benefits of internal and external satisfaction necessary to achieve economic objectives and personal and team gratification.

## **FUNCTIONAL MANAGERS**

The need is not only to have a positive economic feedback but to participate in projects to protect and safeguard people and our planet.

### How to Satisfy

Adhere to projects for the continuous improvement of corporate sustainability, report the results objectively and identify possible evolutions and opportunities for growth from year to year.

## **BUSINESS PARTNERS**

The need of business partners (e.g. subcontractors) is to share the principles of sustainability to spread trust in stakeholders and a team spirit in facing the challenges of our time.

### How to Satisfy

Adhere to a common sustainability policy; define common objectives and strategies in the protection of the environment and in the correct management of human resources.

## **STAFF AND COLLABORATORS**

The ethical requirement is to satisfy one's own needs, economic and personal fulfilment, based on one's attitudes, beliefs, needs and aspirations in an environment that guarantees respect for the health and safety of workers.

### How to Satisfy

Implement a management system that respects the inspiring ethical principles, verifying the satisfaction of the socio-economic, health and safety needs of the personnel employed, in relation to their aptitudes and aspirations, continuously improving the effectiveness of the methods defined to achieve the ethical objectives set.

## **SUPPLIERS**

The ethical requirement is to establish a fruitful collaboration in economic terms and business growth, without compromising its sustainability, through the non-respect of the rights of the resources used (human and environmental).

### Methods of Satisfaction

Establish clear relationships of collaboration and create a partnership in the activity aimed at

respecting the rights of its workers and collaborating on jointly identified improvement actions. Sustainability is achieved through teamwork: therefore, ethical and environmental principles are shared with all the players in the supply chain.

## **CUSTOMERS**

The ethical requirement is to see one's needs met in relation to the product and service purchased without, with this, compromising respect for the rights of the resources used to make it and the environment in which we live; not to damage one's image by associating oneself with behaviour that is not ethically responsible towards the community.

### How to Satisfy

Meet the needs of customers by creating long-lasting collaborations, define a communication channel with them that allows you to receive reports, suggestions and complaints. Monitor customers' sustainability by promoting sustainability principles and stimulating their adherence.

## **COMMUNITY**

An ethical requirement is to see one's own desires to protect and, if possible, improve the well-being and image of the community, understood as businesses and citizens, satisfied.

### How to Satisfy

Build over time a sustainable business model that can contribute to the satisfaction of the image needs of the community in which we grow and concretely inspire all the subjects that are part of it (businesses and citizens); spreading wealth in the area by creating jobs.

## **TRADE UNION**

An ethical requirement is to see the principles of protection and respect for workers applied and to see concrete expression of attention to the worker as a central and founding element of every company

### How to Satisfy

Pay attention to human resources, understanding needs and monitoring the level of satisfaction. Identify improvement actions that can support corporate well-being.

# 2.SUSTAINABILITY REQUIREMENTS



## PRINCIPLE 1 : DON'T PUT IT

Children have the right to play and live their childhood without being forced to work.

### 4.1 CHILD LABOUR

GREGGIO GROUP does not use or support the use of child labour.

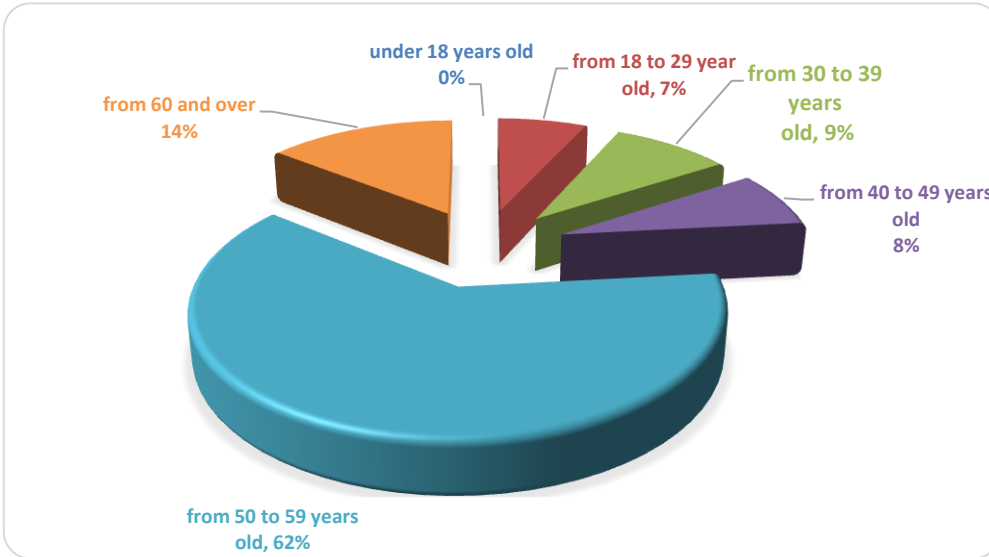
In any case, the company has defined a specific procedure for child and youth labour remedial actions entitled "*Child Remediation Programme*", which highlights the activity of adequate financial and other support established by the company, necessary for the children and young workers involved to allow them to attend school and remain there until they no longer fall within the definition of child or young worker.

The procedure on child labour has been disseminated within the company, posted on the company bulletin board and made available to interested parties.

In the event that GREGGIO GROUP were to receive youth work, it would be managed in accordance with national laws and, in any event, could only be carried out outside compulsory education hours.

Under no circumstances should the time spent between school, work and commuting exceed 10 hours per day and in no case should working hours exceed 8 hours per day. Young workers are forbidden to work at night and, under no circumstances, the company will act in order to harm the physical and mental safety of the child or young worker.

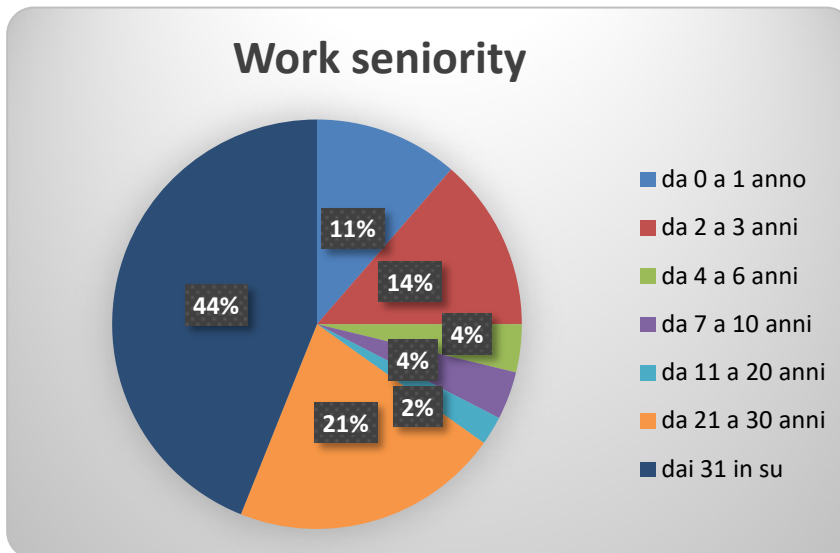
## GREGGIO GROUP EMPLOYEES BY AGE GROUP



The Greggio Group is made up of staff of all ages. There are no minors in the company and 62% of employees are over 50 years of age. The generational change began a

few years ago, so much so that 7% of workers are under the age of 30.

## Work seniority



The Greggio Group highlights its historical presence in the silver world also by the seniority of its employees. 44% of the staff have been present in the company for more than 30 years. The generational change is underway with 11% of staff arriving less than 1 year ago.



### OBJECTIVE 2023:

-Do not resort to child labor and report any cases found in the company or with suppliers.





## PRINCIPLE 8: DECENT WORK

Men have the right to be free and not to be subjected to any form of slavery or physical or mental violence.

### 4.2 FORCED AND COMPULSORY LABOR

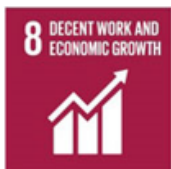
There are no forms of forced labor. Overtime work is freely chosen, is not mandatory and must be authorized. The company does not retain any documents or money as a deposit to obligate the worker. In the company there is wide freedom of expression and there is no support for human trafficking.

In order to facilitate the application of this requirement GRUPPO GREGGIO undertakes to ensure that all workers are fully aware of the rights and duties deriving from the employment contract through:

- Issue of a copy of the individual contract to the worker
- Availability on the part of the human resources office to provide collaborators with all information relating to the contract, pay slip, etc...

Generally, accrued holidays are used up within 18 months of the year of accrual. A small number of people have a holiday disposal plan defined with the human resources office due to an accumulation of days that has occurred over the last few years. The overtime hours were carried out more predominantly at La.Met Spa where a work reorganization plan is in place in order to reduce them.

All foreign residence permits are verified and a copy is kept in order to monitor their expiry and verify that they have been renewed.



### OBJECTIVE 2023

- Reduction in the number of overtime hours
- Holiday disposal plan for workers who have accumulated it over the years



### PRINCIPLE 3 : HEALTH AND WELL-BEING

We guarantee health and safety in the workplace. We do training on alcohol and drug bans. We protect pregnant women and working mothers

#### 4.3 HEALTH AND SAFETY

The Safety Committee of the GREGGIO GROUP considers protecting the health and safety of workers among the primary objectives of the company, adopting procedures, services, control systems and information and training systems in order to ensure:

- in carrying out work activities that safety aspects are considered essential;
- that all risks connected both to the work activities carried out by company personnel and to the company environment and infrastructure are identified and objectively assessed;
- that all technical management measures aimed at preventing or limiting any possible accidental event that could cause injuries or damage to health are adopted;
- that all company figures, at the various levels (managers, department managers, supervisors) participate, based on their duties and skills, in achieving the workers' health and safety objectives
- that their training is carried out and updated with specific reference to the task performed;
- that procedures are defined with control and compliance systems.

The training and awareness-raising activity of staff on safety continues in order to create a health and safety culture within the company

Monitoring of the correct use of PPE is carried out constantly as is the search for good and safe operating practices. During 2022 there were 4 injuries for a total of 91 days of absence from work. The injuries did not result in disability or permanent damage and were due to distraction. The activity of raising awareness among workers to carry out the required work safely continues, as does the modernization of machinery and safety of machinery present in the company for some years. The arrangement of the work areas also continues in order to make the company layout more aimed at process efficiency and worker safety.

injury frequency index:	17.2
injury severity index:	3.1



#### OBJECTIVE 2023:

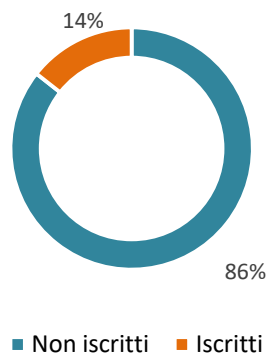
- Ensure the correct and continuous use of the personal protective equipment provided to eliminate or limit injury risks as much as possible;
- continue with infrastructure and machinery modernization activities, monitoring and maintenance of the machinery present in the company
- Try not to have accidents by promoting a culture of safety also through training courses and investments in improving infrastructure and the company environment
- Continue with the updating of risk assessments in compliance with mandatory regulations.

#### 4.4 FREEDOM OF ASSOCIATION AND RIGHT TO COLLECTIVE BARGAINING

All personnel have the right to form, organize, and participate in unions of their choice and to bargain collectively with the organization. The company does not in any way hinder the possibility for workers to join a union.

Union meetings can be called periodically and freely within the company and during working hours.

Union memberships



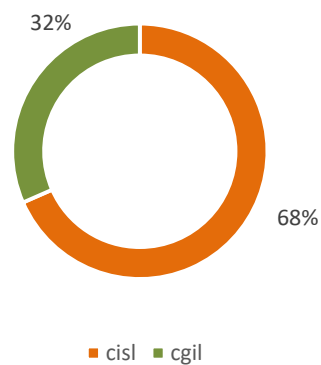
In the Gruppo Greggio 14% of staff belong to a trade union and trade union representatives are present.

Union meetings were held in 2022.

There are currently two trade unions in the company.

Not all the companies in the group are unionized but freedom of association is a right promoted in all factories.

Union acronyms



OBJECTIVE 2023:

-Promote freedom of association, promoting the conduct of trade union activities and collective bargaining.



**PRINCIPLE 5 AND 10: GENDER EQUALITY E  
REDUCTION OF INEQUALITIES**

We guarantee equal opportunities; gender equality, equality in wage in training

**4.5 DISCRIMINATION**

In the company there is no form of discrimination in hiring, remuneration, access to training, promotion, termination of employment or retirement, based on race, national, territorial or social origin, caste, birth, religion, disability, gender, sexual orientation , family responsibilities, marital status, union membership, political opinions, age, or any other condition that could give rise to discrimination.

Under no circumstances does the GREGGIO GROUP interfere with the exercise of the rights of personnel to follow their own political or religious beliefs, family commitments and responsibilities, sexual orientation, needs related to their national or social origin, race, disability, gender, trade union membership, etc. The staff is predominantly made up of men, due to production processes which have attracted, especially in the past, exclusively male staff. Even from a remuneration point of view there are no differences between men and women as the company pays staff based on competence and therefore according to objectively verifiable meritocratic rules.

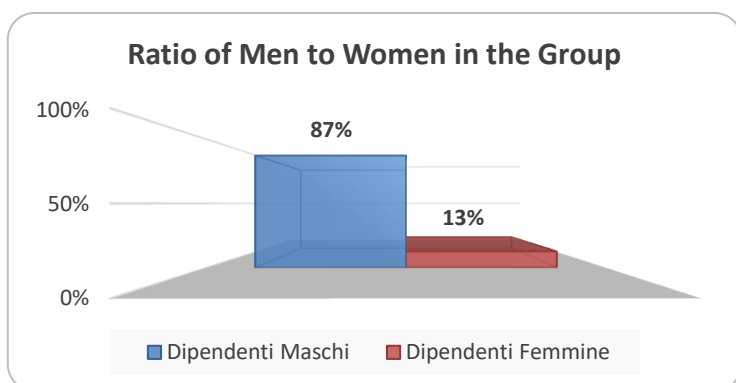
The GREGGIO GROUP monitors the company climate internally in order to avoid cases of physical and verbal mistreatment and behavior that is threatening, offensive, aimed at exploitation or sexually coercive for all company workers wherever they operate.

In the company, the ethics team constantly monitors the absence of such situations and, if necessary, intervenes promptly to eliminate any form of possible discrimination.

The company in no way subjects its workers to pregnancy or virginity tests.

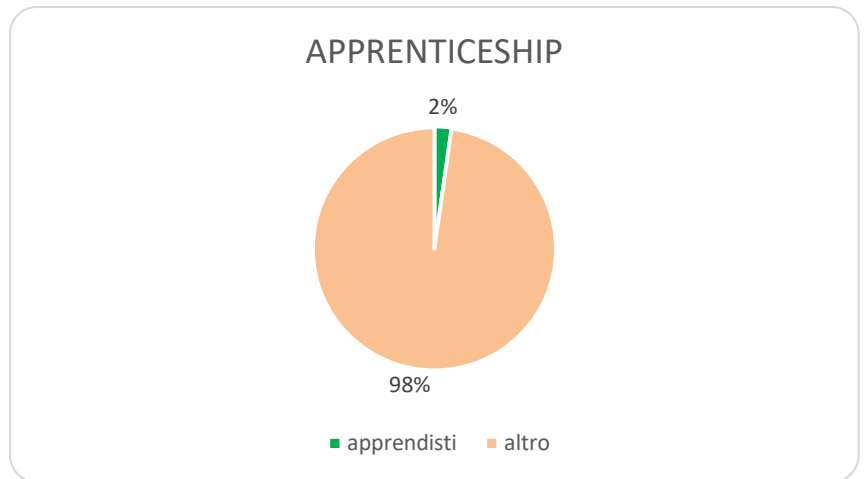
There are some part-timers in order to make the private life-work relationship as easy as possible. The company is made up of staff of different nationalities, there are some disabled people and the search is underway for 2 disabled people to join.

<b>Negative Turnover</b>	<b>7.87</b>
<b>Positive Turnover</b>	<b>11.81</b>
<b>Turnover compensation rate</b>	<b>150</b>

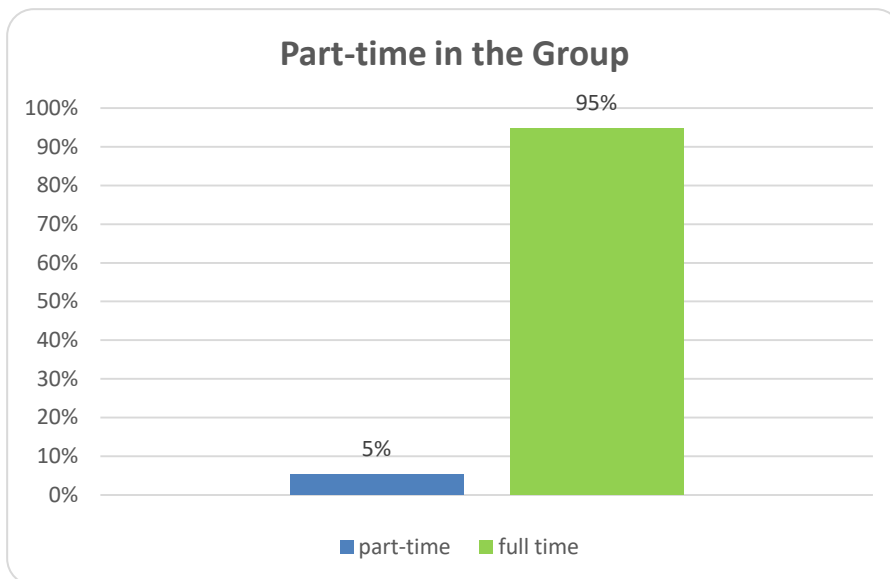


During the year there were some resignations that were largely covered by a series of hires. The percentage of men in the company is significantly higher than women also due to tasks more sought after by male staff. However, the percentage of women has been increasing over the years.

In the Group, 2% of the staff is made up of apprentices.



There are some workers from Senegal, Kosovo, Albania and Great Britain.

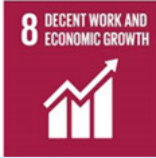


In the Greggio Group, 5% of the staff have a part-time contract.



#### OBJECTIVE 2023:

- Guarantee equal access to employment opportunities and professional growth offered by GRUPPO GREGGIO
- Stimulate the professional growth of staff
- Seek a balanced male/female ratio ensuring equal opportunities with equal skills
- Develop the assessment of skills based on objective elements
- Develop team spirit and sharing of skills



## PRINCIPLES 8 AND 10: DECENT WORK AND REDUCTION OF INEQUALITIES

We guarantee equal opportunities, gender equality, equal pay and training

### 4.6 DISCIPLINARY PRACTICES

The company treats all staff with dignity and respect. A system of gradual communication of violations by workers has been implemented in the company, in order to encourage cohesion between management and workers together with an awareness on the part of workers of errors that must not be repeated because they are harmful to the health of the worker. and workers and for company efficiency.

In particular, the main rule to adopt is to follow a gradual process consisting of:

- verbal warnings
- written warnings
- fines
- suspensions
- dismissal

The application of these actions occurs in compliance with the following requirements:

- from the health and safety system
- by the labor law rules

During 2022, 2 disciplinary cases were handled which led to a written warning and a verbal warning.

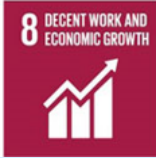
The company has a reporting system, including anonymous reporting, that can be used by workers and external stakeholders to express complaints or suggestions. During 2022 there were no reports or complaints from workers or external stakeholders.

The Disciplinary Code is posted on the company noticeboards.



#### OBJECTIVE 2023:

- Maintain an open dialogue with workers by promoting and soliciting suggestions and proposals from them
  - Maintain the principle of graduality and fairness in the management of disciplinary practices
  - Respect the Disciplinary Code



## PRINCIPLE 8 : DECENT WORK

### 4.7 WORKING HOURS

In the GREGGIO GROUP the weekly working hours vary from 35 to 40 hours.

However, at least half an hour lunch break is always guaranteed for all those who have daily working hours.

Working hours vary from plant to plant and also differ according to the job performed.

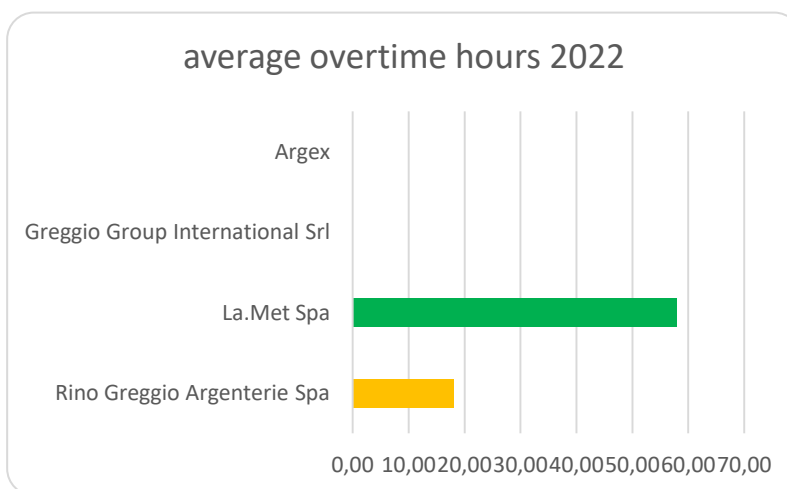
Working hours are recorded in the company via:

- Badge reader
- Attendance sheet / timesheet

In some factories overtime hours are worked, in others they only work during ordinary hours (e.g. Argex Ltd). Everyone is provided with at least 4 weeks of holiday per year and a few days of leave, in accordance with the employment contract applied.

In the factories in Italy we comply with the provisions of the National Labor Contract for the sector. The work takes place from Monday to Friday and only in some cases on Saturday. Sunday is always considered a day of rest.

Only a few people in a plant have accumulated residual vacation days over time which will have to be disposed of in the coming years.



The average overtime hours are higher in La.Met Spa and are due to the type of production process carried out, which involves the need for operators to supervise the casting without the possibility of interrupting the process.

This data is carefully monitored and the Company Management has already prepared corrective actions in order to reduce the number of overtime worked.



### OBJECTIVE 2023:

- Constantly monitor the use of vacation days by staff and provide a disposal plan for those who have accumulated them over the years
- Reduce the number of overtime hours worked by some people.



## PRINCIPLE 2 AND 8 : ZERO HUNGER AND DECENT WORK

### 4.8 SALARY

The remuneration is given monthly and is consistent with the living wage established for each geographical area to which the plant belongs.

The living wages for each area have been calculated: the English living wage is equivalent to 18,964.4 pounds per year, or 10.42 pounds per hour. The lowest level on the English site allows a salary of at least 10.70 pounds per hour, amount higher than the living wage. The living wage in Northern Italy corresponds to 1139.18 euros and that in Central Italy corresponds to 996.21 euros. All salaries are higher than the living wage established by geographical area.

The salary is given once a month without any delay and is paid by bank transfer. Each worker receives a monthly pay slip with details of their remuneration.

The salary includes all deductions required by law and is always consistent with the hours worked and the role held. 100% of workers are covered by healthcare. Overtime hours are paid with an increase in accordance with the provisions of the applied employment contract.



OBJECTIVE 2023:

- Guarantee the monthly salary without delay to all workers according to the stipulated contract.





PRINCIPLE 6, 12, 13, 14, 15 : CLEAN WATER, RESPONSIBLE PRODUCTION AND CONSUMPTION , LIFE ON LAND , CLIMATE CHANGE AND LIFE UNDER THE SEA



#### 4.9 ENVIRONMENTAL PROTECTION AND ENVIRONMENTAL PERFORMANCE

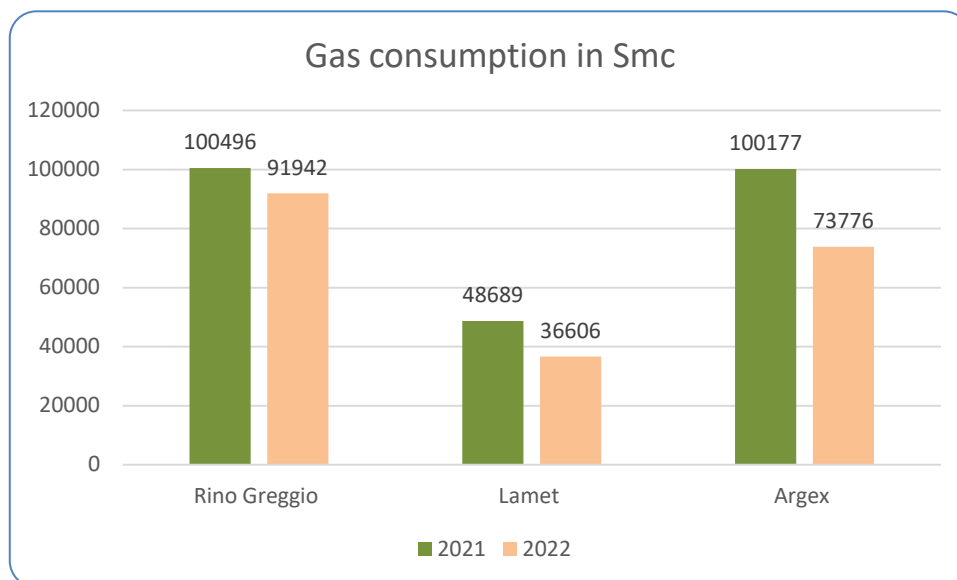
The registered office of the GREGGIO GROUP is located in Rubano, just outside Padua.

The Group has appointed an environmental management system manager in each plant who monitors the progress of the environmental system and identifies improvement actions.

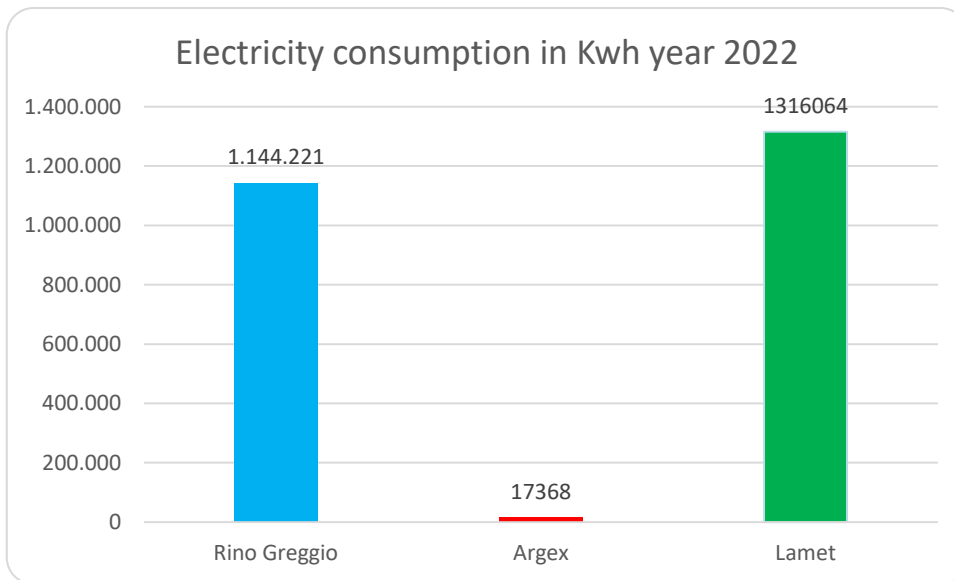
It also periodically checks the consumption of electricity, gas and water.

Waste management is carried out in compliance with current regulations and the GREGGIO GROUP aims to develop a circular economy.

The valuable raw materials used are generally recycled materials. The company objective is to essentially produce products with recycled silver. The company does not intend to exploit natural resources, avoiding marketing products made with raw materials from mines and encouraging the market of recycled RJC COC raw materials.



Gas consumption has reduced in all Group companies thanks to an increase in the efficiency of production processes.



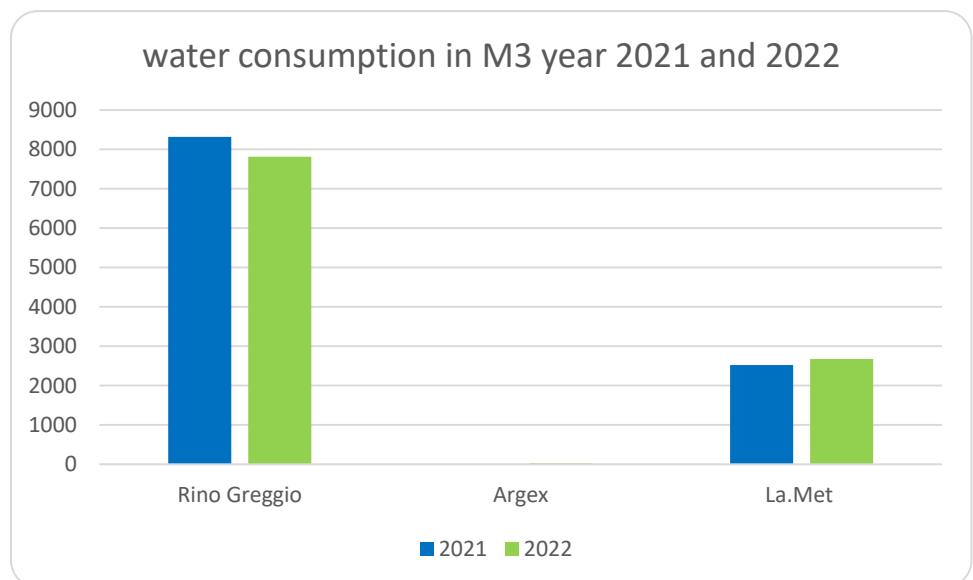
Electricity consumption is currently only recorded for the year 2022. Rino Greggio and La.Met are two energy-intensive companies. Over the last few years, various measures have been

implemented to make the process more efficient and reduce electricity consumption.

The Padua factories have been equipped with an LED lighting system.

Furthermore, La-Met and Rino Greggio are equipped with a photovoltaic system of 200 kW/h and 68 kW/h respectively. A renovation of the condensing heating plants is planned to reduce energy consumption. Inverter air compressors were purchased during 2022.

Water consumption is very limited in Argex and more significant in Rino Greggio where water becomes part of the production process. Even for water the company is trying to make its use more efficient.



All waste is managed with specific forms. In Rino Greggio, 87,590 kg of waste were produced compared to 32,760 kg in La.Met. 36% of the waste produced in Rino Greggio is recycled and 64% is sent to landfill. All sites have an Environmental Authorization and are subjected to periodic checks regarding their emissions. Every year the Italian companies of the Group present the MUD (waste declaration).



OBJECTIVE 2023:

- Expand photovoltaic system.
- Mainly market products made with recycled raw materials and not from mines
- Aiming for the exclusive use of materials made with sustainable raw materials.

#### 4.10 DUE DILIGENCE ANALYSIS

GREGGIO GROUP has carried out a due diligence analysis related to sustainability principles in accordance with the OECD Guidelines aimed at both its own organization and the supply chain and counterparties.

This led to the implementation of a risk analysis in order to identify any critical issues in compliance with the RJC Cop requirements and to act promptly to resolve them through the implementation of corrective actions.

The supply chain has been qualified against a series of risks identified on the required requirements and customers have been mapped in order to ensure that the entire supply chain complies with the requirements of legality, social responsibility and sustainability required by sustainability standards. On the occasion of the preparation of the Sustainability Report, the list of qualified suppliers was approved and the methodology adopted was confirmed.

#### 4.11 MANAGEMENT SYSTEM

GREGGIO GROUP has a sustainability management system in place that complies with the requirements of the RJC COP standard.

Below is a brief summary of the activities implemented to maintain the requirements of the codes of ethics applied.

**ETHICAL RESPONSIBILITY POLICY:** see the Sustainability Report at the beginning.

**MANAGEMENT REVIEW:** On an annual basis, management reviews the results of the sustainability system. On this occasion, the management verifies the achievement of all the objectives related to all the aspects examined and possibly sets corrective actions and approves the improvement plan.

**PLANNING AND IMPLEMENTATION:** with a view to continuous improvement for the awareness of all staff in charge of topics related to sustainability aspects, GREGGIO GROUP implements and prepares training plans that integrate training activities with courses at various levels of staff relating to sustainability issues.

Suppliers are constantly monitored through a system of information collection and subscription to sustainability principles.



**SUPPLIER CONTROL:** GREGGIO GROUP's goal is to help improve the conditions of workers throughout the production chain.

The company has established and maintains active procedures for the evaluation and selection of suppliers, based on their ability to meet the requirements of the ethical standards applied.

The requirements established for the achievement of the company's objectives in this field are:

- Selection of reliable and ethically compliant suppliers
- Monitoring of supplier performance over time
- Adoption by the supplier of any corrective actions in the event of incomplete compliance with ethical requirements
- Involvement of the supplier in the process of continuous improvement of the sustainability system.

Operationally, the evaluation of suppliers was carried out by asking all suppliers to adhere to the ethical requirements, by sending the adhesion form.

GREGGIO GROUP keeps records of all its suppliers' commitment to social responsibility, including but not limited to their written commitment to:

- meet all the requirements of the RJC COP standard
- participate in the surveillance activities carried out by GREGGIO GROUP.
- promptly remedy any identified non-conformance with the requirements of the RJC COP standard.

- Immediately and completely inform GREGGIO GROUP of all company relationships with their other suppliers or relevant sub-contractors regarding the supplies requested.
- Provide cooperation during any audits that GREGGIO GROUP will hold at their premises

**ISSUES AND CORRECTIVE ACTIONS:** the complaint management of the sustainability system ensures through the application of the recall/reporting procedure the possibility for interested parties to submit reports or complaints, or provide information about the ethical management system, as well as compliance with the requirements of the system and the reference standard. Written communications (including anonymous communications for employees) may concern:

- Third parties (suppliers, customers, etc.); these communications must be sent by post, fax or e-mail to the contacts indicated on the form available on the **company (group) website [www.greggio.com](http://www.greggio.com)**
- Employees and internal contractors. Such communications may be direct involving representatives of the ethics team or in written form as detailed in the Social Responsibility Manual and as summarized in the complaint/report form.

**In 2022, GREGGIO GROUP did not receive any reports from interested parties.**



## TARGET 2023: 0 COMPLAINTS AND REPORTS

**ANTI-CORRUPTION AND FRAUD** : The company has put in place a system of constant monitoring of operating practices in order to prevent there from being situations of corruption or fraud. During 2022, no non-conformities were detected on these

and no reports were received from either internal or external stakeholders. In fact, there is a system in the company, even anonymous, for reporting any type of violation related to this issue.

Appropriate training is carried out annually on anti-corruption issues for professionals who are particularly at risk in this area.



## TARGET 2023: 0 COMPLAINTS ABOUT CORRUPTION

**INTERNAL COMMUNICATION:** the company aims to disseminate and make available the information on the RJC to all employees and collaborators of the company. This initiative, in line with the company's line and dissemination of information and activities, stems from the awareness of the importance of involving employees on the issues addressed by ethical standards. In this regard, the company makes the Ethics Policy available on the company bulletin board, provides training on ethical and sustainability principles to all staff and makes a copy of the Sustainability Report available at the company reception.

**EXTERNAL COMMUNICATION:** communicating in detail and informing in the correct way has always been a priority objective for GREGGIO GROUP, a need that has grown in tandem with the multiplication of media in recent years.

Listening to customers' needs and dialoguing with them are activities that provide a useful listening channel to verify the level of user satisfaction, and to

know the perception of the company in a timely and exhaustive manner.

The channels used to transmit this data to the outside world are:

- website
- Communication via email to customers and suppliers

### **LIBERAL ACTIVITIES:**

Every year the company dedicates a portion of its proceeds to charitable activities, through donations linked to specific initiatives. We remember that in 2022 it supported the Church of Tencarola for the annual parish festival and donated a donation to the American Heart Association.

**RECORDS:** GREGGIO GROUP maintains appropriate records required by the management system for social and sustainability responsibility in order to give evidence of compliance with the requirements of the ethical and sustainability standards to which it adheres.