



Contact Information

COMPANY NAME: **LIVIOR. spa**
DATE: **31/03/2025**
REPORTING PERIOD: **01/01/2024 – 31/12/2024**
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COMPANY MANAGEMENT SYSTEMS

LIVIOR. spa has the following policies in place:

- *Company Policy rev.0 dated 30/10/2024*
- *Disciplinary and Conduct code rev.0 dated 11/11/2024*

Our policies detail our commitment to respect human rights throughout our supply chain and our supply chain due diligence regarding *silver* originating from conflict-affected and high-risk areas.

LIVIOR. spa endorses these policies to its suppliers and stakeholders by distributing them via website link

https://www.livior.it/media/362/t-file/RJC_Policy.pdf or e-mail;

these policies can also be accessed by our internal stakeholders via notice boards where all policies are present.

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

- *Suppliers Risk Assessment*
- *Supply chain Policy IDpol001 rev.0 dated 30/10/2024*
- *RJC Manual rev.0 dated 08/01/2025*
- *Annual Reporting*

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

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

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

We have the human rights policy *Company Policy rev.0 dated 30/10/2024* in place, published on the website https://www.livior.it/media/362/t-file/RJC_Policy.pdf

The senior manager responsible for overseeing our human rights impacts is Silvia Alessio as *HR Responsible*.

LIVIOR. spa 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
- Furniture
- Certifications
- Risk level

During the past year no audits were carried out at subcontractors

NR SUPPLIERS (for precious metals)	5
NR SUPPLIERS CERTIFIED RJC COP, LBMA or banks	3
NR REFINERS	
NR REFINERS CERTIFIED RJC COP or LBMA	
NR SUBCONTRACTORS	41
NR SUBCONTRACTORS CERTIFIED (RJC, LBMA, etc...)	
NR AUDIT TO SUBCONTRACTORS	0
NR OF LOW RISK LEVEL SUPPLIERS AND SUBCONTRACTORS	
NR OF MEDIUM RISK LEVEL SUPPLIERS AND SUBCONTRACTORS	
NR OF HIGH RISK LEVEL SUPPLIERS AND SUBCONTRACTORS	

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 Mod001*
- *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.livior.it/ita/whistleblowing>

Till today **no grievances have been received**. The responsible for these grievance mechanisms is an external Case Manager 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, **LI.VI.OR. spa** 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; **LI.VI.OR. spa** 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 IDpol001* integrated with *Anti-Corruption code* rev.0 dated 30/10/2024.

STRATEGY

Our risk assessment findings are received by *Andrea Berton* 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

LI.VI.OR. spa will provide the training regarding human rights to its employees within July; this training includes information on:

- Standard RJC-COP-April-2019
- Standard RJC-CoC-2017-Chain of Custody
- Responsible supply chain
- Human Rights and Working Conditions
- Health, Safety and Environment
- Corporate Policy
- Social and Human Rights
- Commercial, Anti-Corruption, Anti-Bribery and Anti-Money Laundering Policy
- Security

LI.VI.OR. spa 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.livior.it/media/368/t-file/RJC_annual-report.pdf

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

LI.VI.OR. spa has joined the RJC in May 2025 and will achieved the COP certification within the year 2025.