

# **REPORTING REQUIREMENTS**

**FOR COPs**

**3, 27, 6 & 7**

**BROPIN Srl**

Contact Information

COMPANY NAME: **BROPIN SRL**  
DATE: **29.04.2025**  
REPORTING PERIOD: **2024**  
CONTACT: **comitatorjcbropin@bropin.it**

COMPANY MANAGEMENT SYSTEMS

BROPIN SRL have the following policies in own website (<https://www.bropin.it/>), detailing our commitment to respect human rights throughout our supply chain and our supply chain due diligence on the following minerals gold, silver, palladium originating from conflict-affected and high-risk areas. BROPIN SRL endorse these policies to our suppliers and stakeholders by distributing them via e-mail and website, these policies can also be accessed by our internal stakeholders via company public board and externally via and externally via website.

To support supply chain due diligence, we have implemented the following internal measures: a supplier analysis and qualification process that takes into account a risk prioritisation index.

The senior manager responsible for overseeing supply chain due diligence is Ethics Committee.

To aid us in identifying our human rights impacts we have developed and implemented the follow systems:

- RJC\_Human\_Rights\_Due\_Diligence\_Toolkit
- Human rights risk analysis
- Internal audits

During these analysis no HIGH risks has been rilevated.

We have the human rights policy (*RJC.POL. 28/1/25*) published in own website <https://www.bropin.it/>

The senior manager responsible for overseeing our human rights impacts is Ethics Committee.

BROPIN SRL have established a system of controls and transparency over our supply chain, which include our approach for identifying suppliers and identifying sources of our materials and products with signing of commitments and a supplier analysis and qualification process that takes into account a risk prioritisation index. These methods reinforced our due diligence efforts through a clear approach with the supplier. From the analysis performed, this is the situation of BROPIN's qualified suppliers:

Qualified Suppliers	IPR high	IPR medium	IPR low
34	0	10	24

IPR = Risk Priority Index		
10 -	20 =	LOW
21 -	30 =	MEDIUM
31 -	50 =	HIGH
51 -	=	VERY HIGH

Average IPR: 16,8 (max 24,5 min. 10)

As a company we communicate our expectations regarding human rights and supply chain due diligence by sharing our company policy and asking all suppliers to sign the RJC commitment, through which they commit to uphold the company values in accordance with RJC standards.

In addition to this, we also maintain continuous and long-lasting relationships with our suppliers, creating a stable collaboration based on mutual knowledge and trust.

The outcome of doing so has been very positive, all our suppliers are RJC certified and accepted our policies; the risk of out supply chain is LOW (Average IPR: 16,8 (max 24,5 min. 10).

Our grievance mechanism can be accessed to everyone through the following channels :

- via signal box and dedicated email ([comitatorjcbropin@bropin.it](mailto:comitatorjcbropin@bropin.it))
- sending a letter, addressed to the attention of the personnel office, to the address of the company's registered office: Via Luigi Galvani 38-40, 52100 Arezzo (AR)
- hand delivery of the report or written complaint to a member of the RJC Committee
- *Whistleblowing* platform.

For the complete rules for reports, please refer to the complaints and suggestions procedure (ID.PRO.04), published on the BROPIN website.

No grievances were received during the reporting period in question.

The responsible for these grievance mechanism is Ethics Committee.

#### IDENTIFIED & ASSESSED RISKS

We assess our own and supplier's due diligence practices and those relating to human rights by applying the corporate code of ethics and sharing it with all our clients and suppliers.

During the evaluation of our and our suppliers' due diligence and human rights practices, we identified potential and actual risks within our supply chain.

Based on the type of supply and activities we require from our supply chain, possible criticalities may be:

- Delivery and use of personal protective equipment (PPE)
- Mandatory training for workers
- Presence of practicability of the premises or other authorisations on the structure
- Environmental authorisations
- Maintenance of machinery, equipment and facilities
- Maintenance of fire-fighting equipment
- Correct storage of workers' identity documents
- Regular medical examinations and fitness for the job
- Correct drafting of employment contracts
- Presence and correct drafting and storage of waste disposal documentation

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

- Immediately suspend or stop purchasing from the suppliers involved. Mitigate where possible.
- Immediately suspend or discontinue purchasing from affected suppliers. Mitigate where possible.
- Continue or temporarily suspend trade with suppliers but implement measurable mitigation actions. Suspend or discontinue if mitigation measures are ineffective.

During the evaluation of our and our suppliers' due diligence and human rights practices, we did not identify any risks that resulted in the definitive loss of a supplier's qualification. Our partners have always been willing to adhere to the values promoted by BROPIN Ltd, to subscribe to our RJC policy and to cooperate in providing the information required for supply chain qualification.

## STRATEGY

Our risk assessment findings are received by Ethics Committee.

To respond to the risks identified within our supply chain, we have taken the following steps to design and implement a risk management plan:

- Informing suppliers of any NCs found during the course of relations with them;
- Helping them to propose appropriate corrective actions when NCs are detected
- Periodically re-qualify the supply chain based on changes communicated or information gathered on the suppliers used.

We have taken the following risk mitigation measures to implement our risk management plan:

- Identify the risk
- adopt corrective action plans
- Improve corrective actions
- Monitor and track the effectiveness of these risk mitigation measures by requesting evidence.

**BROPIN** provided human rights training to its employees through in-person training sessions and public notice boards; this training included information on

- RJC-COP-April-2019 Standard
- Responsible supply chain
- Human rights and working conditions
- Health, safety and the environment
- Company policy
- Social and human rights
- Trade, anti-corruption, anti-bribery and anti-money laundering policy
- Security

*This training included information on our code of conduct and anti-corruption code.*

**BROPIN** communicate to our stakeholders regarding our due diligence activities and efforts to prevent human rights risks. This communication is in the form of signed commitment. When a human rights risk is identified we communicate the risk and how we are addressing it to potentially affected stakeholders by email.

Since our last report **no grievances have been raised** regarding human rights risks or our supply chain due diligence.

## SECURITY

**BROPIN** srl has carried out the “Security” risk assessment in order to identify: threats, security risks, etc. that protect employees, but also visitors to the company. The company has an alarm system, external cameras and safes for the headquarters. The company uses the security service for night hours.

**No grievances** have been raised in this regard.

## HEALTH SAFETY AND ENVIRONMENT

The following consumptions have been inserted into the control matrix of the management system and take into account the year 2024: **BROPIN** srl complies with the rules contained in Legislative Decree 81/2008, the Consolidated Law on Health and Safety at Work. It has issued and constantly keeps updated the DVR (risk assessment document); it regularly carries out all mandatory training for employees on safety in the workplace and keeps an active Accident Register through which decisions can be made on the effectiveness and prevention of safety. The main dangers come from risks: chemical, repetitive movements, ergonomic. The company analyses the trend of accidents through the maintenance of records.

**BROPIN**, through the continuous consultancy of external technicians, ensures continuous control in environmental management and through specific indicators, directing its activity towards an ever-decreasing use of resources and an ever-decreasing environmental pressure. Consumption is subject to constant control and monitoring through the *Power BI* platform for electricity and fuel; while water consumption is monitored internally.

With regard to waste production, **BROPIN** srl strongly sensitizes its employees towards a progressive release of the quantities conferred and on good practices of separate waste collection. The company has invested considerable effort with specific initiatives such as the positioning of containers for separate waste collection in places of greatest influx.

From the open listening channels with employees and stakeholders (complaints and reporting procedure) **no grievances** have been raised in this regard have emerged.

#### WORKERS' RIGHTS AND WORKING CONDITIONS

BROPIN firmly believes in the value of its resources, has adopted the code of ethics and the anti-corruption code and informed its employees and stakeholders of the related contents.

In the reference period BROPIN srl has not undertaken or supported Child Labor, has not practiced forced labor, forced labor, involuntary labor or labor in detention; has respected the right of employees to freely associate with Workers' Organizations, at their discretion, without interference or negative consequences for them by the company itself as established by the CCNL.

From the open listening channels with employees and stakeholders (complaints and reporting procedure) **no grievances** have been raised in this regard have emerged.