

REPORTING

(in accordance with the RJC COP and COC Requirements)

LUCCHETTA
1953

25 June 2026

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SECTION A: CORPORATE IDENTITY

LUCCHETTA ARMANDO S.r.l. was founded in 1953 by Stefano, grandfather of the current chairman, Massimo, and has been active in the production of jewellery for the goldsmith's trade for over 60 years.

In 1955, Armando, Massimo's father, took over the running of the company and devoted himself full-time to goldsmithing to assist his father.

In the 1960s, it was the coin purses and 'felci' that enjoyed resounding success in the predominantly Northern European market.

In 1990, Armando and his wife, Maria Luisa Trevisan, decided to expand the company and relocate to its current premises at Via Pio La Torre, Bassano del Grappa (Vicenza): 3,000 square metres of production space, a leading manufacturer in the field of fine jewellery and small jewellery items, with over 10,000 products.

For **LUCCHETTA ARMANDO S.r.l.**, the 1990s marked an expansion into new markets in both the West and the East, skilfully creating jewellery that reflected different cultures yet was united by a shared love for the most precious metal: gold.

Since 1998, the third generation of **LUCCHETTA ARMANDO S.r.l.** has joined the company, bringing organisational innovation and new design concepts that anticipate and carefully interpret fashion trends.

In 2003, the company celebrated its 50th anniversary.

In 2020, the second generation handed over the reins to the third, transferring ownership and management to Massimo Lucchetta.

In 2023, the company celebrated its 70th anniversary.

The company has adopted an internal management system in accordance with the ISO 9001 standard, which is currently not certified.

The company obtained its first RJC-COP certification in 2017 and has continued along this path ever since, also introducing COC certification in 2022.

A.1) RJC POLICY

The management has reviewed its Policy dated 6 April 2024 and found it to remain appropriate considering the current organisational structure.

ARMANDO LUCCHETTA S.r.l. complies with current legislation and the relevant technical standards for its sector, ensuring that it is kept up to date with any changes and implements them promptly.

We are committed to upholding the RJC Principles and Rules of Procedure by informing our stakeholders (employees, contractors, suppliers and customers) of the principles contained therein and disseminating them.

We take care to assess our risks, including those to our business arising from our business partners, by analysing the most sensitive situations and implementing appropriate procedures and controls in accordance with human rights, social principles and environmental considerations.

Suppliers and external partners play a fundamental role in improving the company's overall competitiveness.

The Company's relationships with suppliers and external partners, in the pursuit of maximum competitive advantage, are based on loyalty, impartiality and respect for equal opportunities for all parties involved.

ARMANDO LUCCHETTA S.r.l. requires its suppliers and external contractors to comply with the principles and requirements set out in this RJC Policy.

This policy will be displayed at the operational, commercial and administrative headquarters at Via Pio La Torre 26, 36061 Bassano del Grappa (VI).

We do not tolerate any form of bribery of public officials or any other party, in any form or manner, in any jurisdiction, even where such activities may in practice be permitted, tolerated or not prosecuted.

The payment of bribes or the acceptance of any form of benefit is prohibited.

We will not tolerate money laundering and/or the financing of terrorist activities.

We are committed to Know Your Customer and Supplier practices and exercise the utmost vigilance over our supply chain, specifically regarding the supply of gold, silver, diamonds and precious gemstones.

We are committed to sourcing diamonds from supply chains that comply with the World Diamond Council (WDC) guidelines and LBMA-certified gold.

We are committed to ensuring product security measures are in place both on our premises and during transit, to prevent theft, damage or substitution.

We are committed to ensuring the safety and wellbeing of employees, visitors and other relevant stakeholders who visit our company.

We are committed to providing full and detailed information on the characteristics of the products we sell.

We are committed to upholding the principles of confidentiality and the protection of confidential data.

We are committed to safeguarding the safety and wellbeing of employees, visitors and other relevant business partners.

We believe in and are committed to respecting fundamental human rights and the dignity of the individual, in accordance with the Universal Declaration of Human Rights adopted by the United Nations.

We do not tolerate the use of child labour.

We are committed to not using any form of forced labour, bonded labour, contract labour or prison labour, and to not restricting the freedom of movement of employees and workers.

We are committed to ensuring high health and safety standards at our premises and in our operations, thanks also to the collaboration of the Health and Safety Manager and the Workers' Safety Representative.

We are committed to not discriminating on the grounds of race, ethnicity, caste, country of origin, religion, disability, gender, sexual orientation, trade union membership, pregnancy, political affiliation, marital status, physical appearance, age or any other unlawful restriction in the workplace, so that all persons 'fit for work' are afforded equal opportunities without discrimination on the basis of factors unrelated to their ability to perform the required duties.

We undertake not to practise corporal punishment under any circumstances and to prohibit the use of degrading treatment, harassment, abuse, coercion or intimidation in any form.

We undertake to establish a procedure for handling disciplinary disputes relating to behaviour that does not comply with COP standards.

We undertake to comply with current legislation regarding working hours and pay; where no such legal requirements exist, we undertake to adopt the standards prevailing in the sector.

We are committed to protecting the surrounding environment:

- by eliminating, or where this is not possible, reducing the use of toxic substances in production operations;
- minimising the negative impact of our activities on the environment.
- disposing of waste responsibly.
- reducing our consumption of paper, water and energy.

With regard to serious abuses associated with the extraction, transport and trade of gold

We do not intend to tolerate, profit from, contribute to, assist or facilitate:

- torture, cruel, inhuman and degrading treatment;
- forced or compulsory labour;
- the worst forms of child labour;
- human rights violations and abuses;
- war crimes, violations of international humanitarian law, crimes against humanity or genocide.

We will immediately cease all dealings with suppliers further up the supply chain should we identify a reasonable risk that they are involved in, source from, or are linked to a party committing the abuses listed above

With regard to direct or indirect support for non-state armed groups, we will not tolerate direct or indirect support for non-state armed groups, including, but not limited to, the procurement of gold, the making of payments, or the provision of assistance or equipment to non-state armed groups or their affiliates which, unlawfully:

- control mining sites, transport routes, gold trading centres and upstream actors in the supply chain; and/or
- extort or demand money or gold at mining sites, along transport routes or at gold trading centres, or from intermediaries, export companies or international traders.

We will immediately cease all dealings with suppliers further up the supply chain should we identify a reasonable risk that they source from, or are linked to, a counterparty that provides direct or indirect support to non-governmental armed groups.

A.2) THE WORKFORCE

The workforce of **LUCCHETTA ARMANDO S.r.l.** as at 31 December 2025 currently consists of 32 permanent employees and 1 sole director.

Below is an analysis of the distribution by age group, length of service and place of residence:

Age groups (years)	18–20	20–25	25–30	over	Total
Number	0	1	0	31	32
women	0	0	0	19	19
men	0	1	0	12	13

Length of service with the company (years)	0–2	2–4	4–6	Over	Total
Number	4	7	2	19	32

Origin	Number of employees
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Municipality of Bassano	10
Residents in the province of Vicenza	21
Other provinces in the Veneto region	1
Other Italian regions	0
Abroad	0

A.3) RJC COP IMPLEMENTATION

The company, with a view to continuous organisational, process and product improvement, and in line with the social sustainability project promoted by the RJC, has set itself the objective of implementing and certifying its system in accordance with the 2019 edition of **the Responsible Jewellery Council (RJC)** standard. The 2024 editions of the COP and COC requirements have been published; the company will bring its systems into line by May 2027.

ANNUAL REPORT

LUCCHETTA ARMANDO SRL has regularly verified that all precious materials used in its production cycle originate from RJC COP-certified companies.

As regards gold, it is purchased from banks that issue LBMA certification or from RJC COC-certified metal dealers; the silver used is recovered from master alloys supplied by RJC COC-certified suppliers.

Diamonds and coloured gemstones are sourced from suppliers who have undergone due diligence, and from 2025 onwards, proof of the origin of the gemstones will also be required.

This verification was carried out by directly checking the RJC websites to confirm the validity of the certificates held by the refining companies and gold suppliers from which LUCCHETTA ARMANDO SRL sources its materials.

LUCCHETTA ARMANDO SRL's management system, in fact, sets out policies and procedures with clear lines of responsibility and provides appropriate training for the staff involved to ensure the correct implementation of the 'Due Diligence for Responsible Sourcing from Conflict and High-Risk Areas', in accordance with the requirements of RJC COP 2019, point 7, and the OECD Guidelines, Step 5.

The system requires that, each year as part of the reporting process, a risk assessment be carried out to verify the validity of the required certifications, as described above, and

compliance with human rights. No issues requiring attention have been identified; the assessment carried out identified the site as low risk.

COP 5. BUSINESS PARTNERS

A business partner is defined as an organisation or business entity with which **LUCCHETTA ARMANDO SRL** has direct business relations, and which purchases and/or sells a product or service that contributes directly to the manufacture or sale of jewellery products containing gold and diamonds. This includes customers, suppliers and all entities providing services related to the requirements of the RJC Code, such as security service providers and recruitment agencies, for which due diligence is required.

LUCCHETTA ARMANDO SRL's customers are located both in Italy and abroad; they are mainly wholesalers and retail chains.

The market is primarily focused on the United States, Europe and Australia.

LUCCHETTA ARMANDO SRL launched an e-commerce platform in November 2022 and has had a contract with Amazon since 2016.

It is company policy not to sell directly to employees.

The Code of Practice stipulates that RJC Members, in accordance with their capabilities, should involve stakeholders in the implementation of RJC requirements.

To this end, **LUCCHETTA ARMANDO SRL** has sent its RJC Policy to all customers, setting out how **LUCCHETTA ARMANDO SRL**, is committed to upholding these principles.

For suppliers covered by the Code of Conduct, except for banks, **LUCCHETTA ARMANDO SRL** has drawn up a self-declaration regarding compliance with RJC requirements.

All suppliers are sent a copy of **LUCCHETTA ARMANDO SRL**'s Policy.

Most suppliers involved in the precious metals supply chain are COP-certified.

COP 11. Corruption and Facilitation Payments

The term 'corruption' means offering, promising or giving, as well as receiving or accepting, any undue advantage, whether directly or indirectly, to or from:

- a public official or government official (a politically exposed person);
- a candidate, political party or political official;
- employees, directors or officers in the private sector (including anyone who manages or works for a private company in any capacity) or their agents or representatives.

Facilitation payments are made to secure favourable treatment for something that the recipient of the payment is obliged to do in any case.

Throughout the history of **LUCCHETTA ARMANDO SRL**, there have never been any cases of corruption or the payment of bribes.

La Policy RJC It prohibits any form of corruption, bribery or facilitation payments.

In accordance with its risk analysis, **LUCCHETTA ARMANDO SRL** neither gives nor accepts gifts; this prohibition is also set out in the Policy.

COP 12. KNOW YOUR COUNTERPARTY (KYC-KYS): MONEY LAUNDERING AND TERRORIST FINANCING

At a legislative level, **LUCCHETTA ARMANDO SRL** operates in compliance with the regulatory framework on money laundering (the Anti-Money Laundering Decree, which has partially repealed and replaced Law No. 197 of 5 July 1991).

Clients are required to complete the KYC form to identify the beneficial owners and provide information relating to the company that is necessary to carry out the relevant due diligence and risk assessment.

To date, 59 customers have been involved; the documentation submitted is still being collated, and based on the documents received so far, no issues have been identified.

For suppliers covered by the Code of Conduct, excluding banks, **LUCCHETTA ARMANDO SRL** has also prepared a KYS form to identify beneficial owners and gather information about the company, which is necessary to carry out due diligence and risk assessment.

To date, 32 suppliers have been involved; many are RJC COP and COC certified, and a risk analysis has been carried out. There are currently no critical issues. For subcontractors involved in the COC supply chain, specific training has been organised to explain the PG-CL and the management of COC material (AUC).

There are five subcontractors potentially involved, two of whom are RJC COC-certified.

COP 15-22 Workers' rights and working conditions

LUCCHETTA ARMANDO SRL applies the National Collective Labour Agreement for goldsmiths and silversmiths.

Types of contracts:

No. of employees	Fixed-term employees	Fixed-term employees	Apprentices	Agency
32	32	0	0	

No disciplinary sanctions have been imposed since 2022.

Employees may formally report any issues relating to non-compliance with the company's RJC policy and/or the requirements of this standard, as well as any complaints and/or reports of theft or unauthorised entry. To date, no such reports have been received.

LUCCHETTA ARMANDO SRL does not employ workers under the age of 18 in its production activities, except for any training placements.

LUCCHETTA ARMANDO SRL does not hinder trade union activities, as set out in the RJC Policy. Two employees are members of a trade union, but there are no trade union representatives (RSU).

COP 23. Health & Safety

Lucchetta Armando S.r.l. guarantees safe and healthy working conditions for all employees in accordance with:

- Article 41 of the Italian Constitution
- Article 2087 of the Civil Code
- Legislative Decree 81/2008, as amended

LUCCHETTA ARMANDO SRL engages a qualified external consultancy firm to manage health and safety matters, with a view to continuously monitoring compliance with the requirements of Legislative Decree 81/08

In 2025, **LUCCHETTA ARMANDO SRL** carried out the following measures:

- Training in accordance with the regional guidelines for new recruits
- Medical examinations
- Update to the noise risk assessment register dated 8 September 2025
- Update to the Vibration Risk Assessment Record dated 8 September 2025
- Evacuation drill on 16 September 2025
- Periodic meeting under Article 35.

2026 Objectives: Update of the emergency and evacuation plan; update of the chemical risk assessment document.

COP 22–25 Environmental Management

LUCCHETTA ARMANDO S.r.l. carried out an environmental analysis several years ago, which will be repeated in 2026 to assess the impact of its activities on environmental aspects; this analysis revealed a good level of awareness and management of existing environmental risks, particularly regarding the most significant aspects.

The sources of impact and/or hazard identified are:

- physical agents/noise
- chemical agents/atmospheric emissions
- Water abstraction and use

- Waste
- Energy consumption

In 2025, various pieces of machinery were purchased to replace and improve production processes.

The identified risk mitigation measures continue, namely:

- monitoring of atmospheric emissions in accordance with the requirements of AUA 221/2014 of 14 August 2014.

The company has a photovoltaic system that generates electricity, which is sold to the national grid operator.

In 2025, the photovoltaic system was expanded, and all lighting was replaced with energy-efficient bulbs.

Energy produced	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
kWh	102,715	104,016	96,310	93,596	96,595	91,346	97,471	96,821	97,211	95,315

Monitoring of consumption continues, in particular:

resource	2017	2018	2019	2020	2021	2022	2023	2024	2025
water (sq m)	260	263	264	239	195	228	297	276	305
gas	8,023 cubic metres	12,182 cubic metres	12,434 cubic metres	10,067 cubic metres	15,768 cubic metres	8,711 cubic metres + 5,000 litres	12,300	8,880	10,850
Electricity (kWh)	257,359	169,694	196,562	221,021	257,417	305,644	293,193	280,163	260,829

2026 targets: installation of a new boiler and upgrading of the CPI

CONCLUSIONS

Letter from the Sole Director

This report demonstrates **LUCCHETTA ARMANDO S.r.l.**'s commitment to continuing its ethical and socially responsible approach within the precious metals market.

The aim is to create 'value' for all stakeholders, both in the short and long term.

In line with this approach, our work is geared towards achieving objectives that are both economically and socially effective, in the knowledge that the growth and development of the local area are fundamental prerequisites for the growth of the Company itself.

Through this Report, **LUCCHETTA ARMANDO S.r.l.** aims to demonstrate how its stated commitment to acting as a socially responsible organisation has been translated into concrete actions and results, consistent with its core values, shared mission and established strategies. We therefore believe that this report legitimises our role, in ethical and social terms, in the eyes of our local community and the precious metals market.

Massimo Lucchetta
LUCCHETTA ARMANDO S.r.l.

