

OECD and Due Diligence Annual Report (2022-2023)

Arezzo Refinery Co., Ltd. efforts to comply with RJC Code of Practices ,the Company undertake due diligence on own supply chains in accordance with the OECD's Due Diligence Guidance 5-step framework to ensure that the supply chains are responsibly managed and are "conflict-free" and sourced with respect for human rights.

Company Detail	
Name	Arezzo Refinery Co.,Ltd.
Location	213/5 Laemchabang Industrial Estate (Export Zone) ,Room 5E-2/1 Tungsukla , Sriracha , Chonburi 20230 Thailand
Reporting Date	30 March 2023
Reporting Period	April 2022 – March 2023
Senior management responsible for this report	<i>Mr. Andrea Malfanti Director Compliances & Social responsibility ; Business Development</i>

Summary of activities undertaken to demonstrate compliance

Step 1: Establish strong company management systems

Arezzo Refinery adopted a policy regarding due diligence for supply chains of Silver , Gold, PGM

Comments and Demonstration of Compliance: We established an appropriate supply chain policy which is consistence with the model set out in the Annex II of the OECD Due Diligence Guidance.

The high level of management is well informed of the guidelines and the consequential SOPs define the operative scenario of the daily activities

Arezzo Refinery set up an internal management structure to support supply chain due diligence & OECD

Comments and Demonstration of Compliance: The compliance officer Mr Andrea Malfanti Director , has been assigned to manage the process of internal management, and has a direct line of reporting to company's CEO plus with any level of the company

Arezzo Refinery established a strong internal system of due diligence, controls and transparency over PGMs, Silver and Gold supply chain, including traceability and identification of other supply chain actors

Comments and Demonstration of Compliance: We check and make sure that we have all the require documents before processing PGMs, Silver and Gold. Non Strategic Suppliers due diligence also take place to make sure that our supplier has a transparency over the supply chain.

Arezzo Refinery also communicate our Supply Chain Policy and Code of Conduct to be acknowledge by our suppliers.

Grievance mechanism is in place and Mr.Lwr. Massimo Enzo Chiappa (e.m.chiappa@lcsbangkok.com) is the person who is responsible for response and resolving all the grievances according to the system described in the general policy .

Arezzo Refinery has strengthened company engagement with our suppliers

Comments and Demonstration of Compliance: We have written agreement with our supplier which include our supply chain policy. We also engage with our supplier to properly verify all the documents from their supplier regarding the origin of material. In addition, we follow up with supplier on due-diligence annually compatibly with the role and the dimension Arezzo can perform before its clients.

Arezzo Refinery has established a company-wide communication mechanism to promote broad-based employee participation and risk identification to management

Comments and Demonstration of Compliance: We have an internal communication system in place, allowing employees to voice concerns over the supply chain or newly identified risk, see advices and website and grievances mechanism + .

Step 2: Identify and assess risks in the supply chain

Arezzo Refinery has a process to identify risks in the supply chain

The risk assessment OECD procedure and criteria are documented and risk assessment is done for all suppliers.

We performed due diligence on our supplier to make sure that the products are conflict-free. In addition, we conducted appropriate scrutiny and monitoring of transactions undertaken through the course of the relationship

We identify and assesses risks in the supply chain according to OECD guidance for downstream company.

The Due diligence conducted and the whole implant of the assessment risks, shows that no threat of violations is pending in our chain of supply : No red flag, and by that none of our supplier is classified as high-risk.

Better to recall that our clients are our suppliers by the mechanism of the agreed loss and the purchase quite often we are offered to perform instead of the return.

We have inquired 23 Active Clients (5 of them non certified neither members of RJC and similar) and 6 non strategic suppliers (Logistic , energy, chemicals etc.) , 3 more clients have been dropped from the list due to their poor attitude

Step 3: Design and implement a management system to respond to identified risk

The risk assessment is approved by the management and the CEO MR. Silvio Bidini .

The action plan to be followed for cases of any red flag that may arise in the future, will be managed in a course of actions to remedy the violations , correct the wrongdoings and monitor the effectiveness of the system enacted to respond to the identified risk.

By the nature of the violations the course of actions will be shaped until a satisfactory level matching with the principles fostered by Arezzo Refinery and defined in these 5 steps will be reached

Step 4: Arrange for an independent third-party audit of the supply chain due diligence

Not applicable as we have no red flag, and that none of our supplier is classified as high-risk.

Step 5: Report on supply chain due diligence

Arezzo Refinery Co.,Ltd. make the report available and communicated to all interested party through Company website and email directly to all concerned juristic persons

Other report comments : If users of this report wish to provide any feedback to **Arezzo Refinery Co.,Ltd.** with respect to this report, they can contact Mr. Andrea Malfanti (Director) **Phone:** +66 0888090790 **Email Address :** andreataisap@gmail.com

Grievances to be addressed to e.m.chiappa@lcsbangkok.com