

ANGELMO
1910

Due Diligence Report

For Responsible Sourcing
of Precious Metals

2023

CODE OF PRACTICES

Contact Information

COMPANY NAME: **Hélder dos Santos Torres Herdeiros Lda**
DATE: **November**
REPORTING PERIOD: Year **2023**
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STEP 1: ESTABLISH STRONG COMPANY MANAGEMENT SYSTEMS

Hélder dos Santos Torres Herdeiros Lda. have the following policy in place:

“Hélder dos Santos Torres Herdeiros Lda. is committed to ensuring that precious metals and diamonds are sourced with due respect for human rights, the need to avoid contributing to conflict, and the desire to support development through our supply chain practices. As such, we are committed to:

- a. Respect human rights in accordance with the Universal Declaration of Human Rights and also the International Labor Organization's Fundamental Principles of Rights at Work.
- b. Not be involved in or tolerate bribery, corruption, money laundering, or terrorism financing.
- c. Support government payment transparency to security forces for the protection of the extractive industry.
- d. Not provide any form of direct or indirect support to illegal armed groups.
- e. Allow all stakeholders to participate and raise their concerns related to the quality of our supply chain.
- f. Implement the OECD 5-step framework as a risk management process in a responsible supply chain for materials sourced from conflict-affected or high-risk areas.

At the same time, Hélder dos Santos Torres Herdeiros Lda. does not prohibit the marketing of precious metals or diamonds originating from conflict-affected and high-risk areas when they are sourced in accordance with existing international standards. Avoiding the marketing of all precious metals or diamonds from these areas would cause a constraint with adverse impacts on the living conditions of local populations.”

Regarding to our supply chain on the following minerals; gold, silver, platinum group metals, originating from conflict-affected and high-risk areas. This policy is communicated on the company website and can be accessed via https://docs.google.com/forms/d/e/1FAIpQLSd6tzB-gx5OFH00JMUUI2ZXT5x_KmJ8np_oj0xH7-rlqyPeHw/viewform

To support supply chain due diligence, we have implemented the following internal measures we have established a stand alone policy regarding this subject, a grievance mechanism where stakeholders can share their concerns about circumstances in the supply chain and we also developed a form for our partners to fill in with information about where does their materials come from and who are their suppliers. The senior manager responsible for overseeing supply chain due diligence is António Torres.

Hélder dos Santos Torres Herdeiros Lda. have established a system of controls and transparency over our supply chain; which include, our approach for identifying our suppliers' partners through the form that we previously talked about we were able to identify sources of our products specially related to the country and region our suppliers are getting their material. These methods have strengthened our due diligence efforts by enhancing our relationship with our suppliers and making some of them aware of these kinds of issues.

As a company we communicate our expectations regarding supply chain due diligence via our own Code of Practices where we have all our policies stated. In addition to this we also take the following steps to strengthen our engagement with suppliers; we started by sending them some documentation focused on the definition of a CAHRA'S policy and we explained them what is it and also about the OECD Due Diligence 5 step progress. After that we asked them to answer a several questions concerning their suppliers, the origin of their material and descriptions or safeguards given by its suppliers concerning the origin of the materials they use;

The outcome of doing so has been positive since we consider that we got to know our suppliers better and even had the possibility to identify our supplier's supplier. This type of work also contributes to creating a more transparent and efficient supply chain while strengthening relationships with stakeholders.

Our grievance mechanism for stakeholders can be accessed by clicking

https://docs.google.com/forms/d/e/1FAIpQLSd6tzB-gx5OFH00JMUUI2ZXT5x_KmJ8np_oj0xH7-rlqyPeHw/viewform?usp=sf_link . The employee responsible for this grievance mechanism is António Torres.

STEP 2: IDENTIFY AND ASSESS RISK IN THE SUPPLY CHAIN

We assess our supplier's due diligence practices by reading and analysing all the forms that we have received so that we could figure out where were our products coming from and also checking for any red flags. After that we gathered with some of these suppliers in presential meetings to access these topics on how could they be more aware about these topic and what could they do to strengthen their supply own supply chain.

During our assessment of our supplier's due diligence practices, we identified the below potential and actual risks within our supply chain. [Use the below sentence structure to list any risks or potential risks identified]

- We have identified a risk of not being prepared for this kind of situation related to our suppliers that are all located in Portugal, and by that we mean that none of our suppliers has a structures plan to address this kind of situation.
- We have identified a potential risk of our suppliers related to not getting the necessary warranties from their suppliers concerning the origin of their materials.

STEP 3: DESIGN AND IMPLEMENT A STRATEGY TO RESPOND TO IDENTIFIED RISKS (if applicable)

The senior manager who receives the findings of our risk assessment is Nuno Torres, CEO.

To respond to the risks identified within our supply chain, we took the following steps to design and implement a risk management plan, we started by following the Responsible Jewellery Council guide through and addressed all the risks and potential risks in our risk assessment document, after that we approached our suppliers one more time to enlight them about not contributing to business in CAHRA'S, the importance of getting to know their suppliers and building a stronger and cleaner supply chain and finally and most important to talk to them about the identified risks.

Our risk management plan consists on addressing those problems to our suppliers since the risks we identified are all related to our suppliers' actions or position we assume that the right thing to do would be to pass them the information about those issues and suggest the best way to address them.

Hélder dos Santos Torres Herdeiros Lda. provided the training regarding our due diligence activities to our employees on the months of October and November; this training included information about the Hélder dos Santos Torres Herdeiros Lda. Code of Practices which includes every CoP provision and we took the opportunity to debate most of the provision and hearing our employees' thoughts and concerns related to them. We have also provided training regarding our due diligence activities to all of our employees, this training included information on the specific forms and contacts that we

made of our suppliers and what was the goal with that we also took it further and explained the importance of taking this kind of action.

Hélder dos Santos Torres Herdeiros Lda. communicates to our stakeholders regarding our due diligence activities. This communication is in the form of a Report.

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

CARRY OUT A THIRD PARTY AUDIT (OPTIONAL INFORMATION)

In support of our continuous improvement journey, our third-party RJC audit will take place within our organisation against the RJC COP 2019 on November 22th.