

# REPORTING REQUIREMENTS FOR COPs 6 & 7

DOMA SRL



**COP 6 & 7: HUMAN RIGHTS  
& DUE DILIGENCE**

Contact Information

COMPANY NAME: **DOMA SRL**  
 DATE: **01.04.2025**  
 REPORTING PERIOD: **2024**  
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COMPANY MANAGEMENT SYSTEMS

DOMA SRL have the following policies in own website (<https://www.doma.srl/>), 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. DOMA 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
- Human resources management procedures
- Internal audits

During these analysis no HIGH risks has been rilevated.

We have the human rights policy (*POL.RJC.01 rev.0 23/01/2025*) published in own website <https://www.doma.srl/>

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

DOMA 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 DOMA's qualified suppliers:

Qualified Suppliers	IPR high	IPR medium	IPR low
42	0	4	38

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

Average IPR: 13,8 (max 30,4 min. 5)

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 our supply chain is LOW (Average IPR: 13,8 (max 30,4 min. 5))

Our grievance mechanism for internal stakeholders can be accessed via signal box and dedicated email ([rijc@doma.srl](mailto:rijc@doma.srl)), and with whistleblowing platform (*Whistleblowing procedure for reporting offence and irregularities*); our external grievance mechanism is available via web site with whistleblowing platform (*Whistleblowing procedure for reporting offence and irregularities*); and by writing to the dedicated e-mail address. No grievances were received during the reporting period in question.

The responsible for dedicated email's grievance mechanism is Ethics Committee.

The responsible of whistleblowing platform is 231 Model Supervisory Body.

#### 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
- Corruption of interested parties by insiders
- Environmental authorisations
- Maintenance of machinery, equipment and facilities
- Maintenance of fire-fighting equipment
- Regular medical examinations and fitness for the job
- Correct drafting of employment contracts
- Correct storage of workers' identity documents
- Presence and correct drafting and storage of waste disposal documentation
- Security systems, theft and damage
- Terrorist Financing and Money Laundering
- COC identification and traceability

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 DOMA 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.

DOMA SRL 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.

DOMA 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.