

Scope: Modeling and Design Of Jewelry with Gold and Silver Precious Metals Production, Sale and Export

1. Introduction

Milan Jewellery is committed to respecting, protecting, and promoting internationally recognized human rights throughout all its operations and business relationships. This Human Rights Policy establishes Milan Jewellery's approach to responsible business conduct and reflects its responsibility to prevent, mitigate, and remediate adverse human rights impacts.

This policy is aligned with:

- Responsible Jewellery Council (RJC) Code of Practices 2024
- UN Guiding Principles on Business and Human Rights (UNGPs)
- International Labour Organization (ILO) Core Conventions
- Universal Declaration of Human Rights (UDHR)
- OECD Due Diligence Guidance for Responsible Business Conduct

2. Policy Scope

This policy applies to all activities related to the design, production, sale, and export of gold and silver jewelry, and covers:

- All employees (permanent, temporary, part-time, and contract)
- Management and executives
- Contractors, suppliers, and service providers
- Business partners and customers
- Local communities affected by operations
- The entire supply chain, upstream and downstream

3. Zero Tolerance for Human Rights Violations

Milan Jewellery applies a strict zero tolerance policy toward serious human rights violations, including but not limited to:

- Forced, bonded, or compulsory labour
- Human trafficking and modern slavery
- Child labour
- Harassment, abuse, or inhumane treatment
- Retaliation against whistleblowers

Any confirmed violation will result in immediate corrective actions, including termination of employment or business relationships and remediation for affected individuals.

4. Fundamental Human Rights Commitments

4.1 Prohibition of Child Labour

Milan Jewellery strictly prohibits child labour in any form and complies with:

- ILO Convention No. 138 (Minimum Age)
- ILO Convention No. 182 (Worst Forms of Child Labour)

No person below the legal minimum working age shall be employed.

4.2 Forced Labour – Zero Tolerance

Milan Jewellery strictly prohibits:

- Forced or compulsory labour
- Debt bondage
- Retention of identity documents
- Restrictions on freedom of movement
- Withholding of wages

All employment must be voluntary, and workers may leave employment freely in accordance with applicable laws.

4.3 Non-Discrimination and Equal Opportunity

Milan Jewellery ensures equal treatment and non-discrimination based on:

- Gender, age, race, ethnicity, nationality, religion, disability, sexual orientation, marital status, political opinion, or any other status protected by law.
- Employment decisions are based solely on qualifications, experience, and performance.

4.4 Freedom of Association and Collective Bargaining

Milan Jewellery respects employees' rights to:

- Freedom of association
- Join or not join trade unions
- Engage in collective bargaining

Without fear of reprisal, intimidation, or discrimination.

4.5 Fair Wages and Working Hours

Milan Jewellery commits to:

- Paying wages at or above legal minimums
- Complying with working hour regulations
- Providing overtime compensation
- Granting legally mandated leave and rest days
- Issuing written employment contracts

4.6 Occupational Health and Safety

Milan Jewellery provides a safe and healthy workplace by:

- Implementing occupational health and safety management systems
- Conducting regular risk assessments
- Providing training and personal protective equipment (PPE)
- Preventing workplace injuries and occupational diseases

5. Human Rights Due Diligence

Milan Jewellery implements a **risk-based human rights due diligence process** consistent with OECD and RJC requirements.

5.1 Risk Identification

- Assessment of actual and potential human rights risks
- Consideration of vulnerable groups and high-risk supply chains

5.2 Prevention and Mitigation

- Supplier screening and contractual requirements
- Corrective action plans where risks are identified
- Supplier engagement and capacity building

5.3 Monitoring and Review

- Periodic internal reviews
- Supplier assessments and audits where appropriate

6. Grievance Mechanism and Remedy

Milan Jewellery maintains an **accessible, confidential, and effective grievance mechanism** for employees and external stakeholders.

Reporting Channel:

milanjewellery.com/hotline

compliance@milanjewellery.com

Principles

- Anonymous reporting allowed
- Protection against retaliation
- Timely, impartial investigation
- Documented outcomes and corrective actions

Where adverse impacts are identified, Milan Jewellery commits to providing or cooperating in remediation.

7. Training and Awareness

Milan Jewellery ensures:

- Regular human rights training for employees
- Specialized training for management
- Communication of expectations to suppliers

Training records are maintained.

8. Governance and Accountability

Senior management is responsible for:

- Oversight of policy implementation
- Allocation of responsibilities
- Monitoring compliance and performance

Non-compliance may result in disciplinary measures or termination of business relationships.

9. Transparency and Communication

This policy is:

- Publicly available
- Communicated internally
- Shared with suppliers and business partners
- Integrated into contracts and procedures

10. Continuous Improvement

This policy is reviewed at least annually and updated in line with:

- RJC COP revisions
- Regulatory changes
- Stakeholder feedback

11. Conclusion

Milan Jewellery recognizes that respect for human rights is fundamental to responsible jewelry production and sustainable business. Through this policy, Milan Jewellery commits to ethical conduct, transparency, and continuous improvement in line with RJC Code of Practices 2024.

APPROVED BY THE CEO AND THE BOARD OF DIRECTORS

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