

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

1. Policy Statement

Milan Jewellery is committed to conducting all its activities in the gold, silver, and diamond jewellery sector in accordance with the Responsible Jewellery Council (RJC) Code of Conduct / Code of Practices 2024. This policy defines Milan Jewellery's commitment to ethical business conduct, responsible sourcing, respect for human rights, environmental responsibility, and strong corporate governance throughout its operations and supply chain. Milan Jewellery acknowledges its responsibility to identify, prevent, mitigate, and address adverse impacts related to its business activities and relationships.

2. Purpose and Applicability

The purpose of this policy is to:

- Establish clear standards of ethical conduct aligned with RJC COP 2024
- Integrate social, environmental, and governance principles into daily operations
- Define expectations for employees, suppliers, and business partners
- Promote transparency, accountability, and continuous improvement

This policy applies to:

- All employees, management, and executives
- Suppliers, contractors, subcontractors, and service providers
- Business partners and associated entities
- All activities from procurement to production, sales, and export

3. Governance and Responsibility

Milan Jewellery maintains governance structures to ensure effective implementation of this Code of Conduct, including:

- Clear allocation of roles and responsibilities for RJC compliance
- Integration of this policy into internal procedures and contracts
- Maintenance of records demonstrating compliance
- Senior management oversight and accountability

4. Ethical Business Conduct

Milan Jewellery is committed to conducting business with integrity and transparency.

- **Zero tolerance** for bribery, corruption, fraud, and unethical conduct
- Compliance with applicable anti-corruption, competition, and financial crime laws
- Fair, transparent, and honest business practices

All employees and business partners are expected to act ethically and responsibly.

5. Due Diligence and Compliance

Milan Jewellery applies a **risk-based due diligence approach** across its operations and supply chain.

- Identification and assessment of risks related to ethics, human rights, labour, environment, and security
- Supplier screening and ongoing monitoring
- Implementation of corrective action plans where risks are identified
- Suspension or termination of relationships in cases of severe or unmitigable risk

6. Human Rights and Labour Practices

Milan Jewellery respects internationally recognized human rights and labour standards and commits to:

- **Zero tolerance** for forced, bonded, or compulsory labour and child labour
- Non-discrimination and equal opportunity
- Respect for freedom of association and collective bargaining
- Fair wages, lawful working hours, and decent working conditions
- Protection against harassment, abuse, and retaliation

Regular assessments and audits are conducted to monitor compliance.

7. Health and Safety

Milan Jewellery prioritizes the health and safety of employees and contractors by:

- Implementing occupational health and safety management systems
- Conducting risk assessments and safety training
- Preventing workplace accidents and occupational diseases

8. Environmental Responsibility

Milan Jewellery commits to responsible environmental management by:

- Complying with environmental laws and regulations
- Minimizing environmental impacts through efficient resource use
- Reducing waste, emissions, and pollution
- Promoting recycling and responsible chemical management

Environmental performance is reviewed regularly.

9. Supply Chain Integrity

Milan Jewellery promotes ethical and responsible practices throughout its supply chain by:

- Communicating RJC Code of Conduct requirements to suppliers
- Conducting supplier due diligence and performance monitoring
- Encouraging transparency, traceability, and responsible sourcing
- Supporting supplier capacity-building initiatives where appropriate

10. Stakeholder Engagement and Transparency

Milan Jewellery engages openly and constructively with stakeholders, including:

- Employees and worker representatives
- Suppliers and business partners
- Local communities, NGOs, and industry bodies

Milan Jewellery communicates its ethical conduct and sustainability performance through appropriate reporting mechanisms.

11. Training and Awareness

Milan Jewellery ensures that:

- Employees receive regular training on this Code of Conduct
- Management understands compliance responsibilities
- Suppliers are informed of applicable ethical standards

Training activities are documented and reviewed.

12. Reporting and Grievance Mechanism

Milan Jewellery maintains accessible and confidential channels for reporting concerns related to this Code of Conduct.

- Reports may be made anonymously
- Retaliation against whistleblowers is strictly prohibited
- Reported issues are investigated impartially and addressed appropriately

13. Continuous Improvement

Milan Jewellery is committed to continuous improvement through:

- Regular policy reviews
- Stakeholder feedback
- Monitoring regulatory and RJC standard updates
- Benchmarking against industry best practices

14. Non-Compliance

Violations of this Code of Conduct may result in:

- Corrective actions
- Disciplinary measures
- Termination of contracts or business relationships

15. Conclusion

This RJC Code of Conduct Policy (2024) reflects Milan Jewellery's commitment to ethical excellence, responsible business conduct, and sustainable development. Through effective implementation, monitoring, and continuous improvement, Milan Jewellery aims to comply fully with the RJC Code of Practices 2024 and contribute positively to the global jewellery supply chain.



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RJC CODE OF CONDUCT POLICY

PL.11 | Issue Date: 09.02.2026 | R.00 | Revision Date: - | Review Date: -

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APPROVED BY THE CEO AND THE BOARD OF DIRECTORS

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