



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

1. Policy Statement

Milan Jewellery is committed to the highest standards of ethical conduct, transparency, and accountability across all its operations and business relationships.

In line with the Responsible Jewellery Council (RJC) Code of Practices 2024, Milan Jewellery has established a secure, accessible, and effective whistleblower and grievance mechanism to enable the reporting of concerns related to unethical conduct, legal non-compliance, or violations of company policies.

Milan Jewellery ensures that all reports are handled confidentially, impartially, and without retaliation, and that appropriate corrective and remedial actions are taken.

2. Purpose and Applicability

The purpose of this policy is to:

- Enable safe, confidential, and anonymous reporting of concerns
- Protect whistleblowers from retaliation or discrimination
- Ensure fair, timely, and impartial investigation of reported issues
- Support compliance with legal requirements and RJC COP 2024

This policy applies to:

- All employees, managers, and executives
- Suppliers, contractors, subcontractors, and service providers
- Customers, business partners, and other stakeholders
- Any individual affected by or observing Milan Jewellery's operations or supply chain

3. Reportable Concerns

Concerns that may be reported under this policy include, but are not limited to:

- Bribery, corruption, fraud, or financial misconduct
- Violations of company policies, procedures, or codes of conduct
- Non-compliance with laws or regulatory requirements
- Occupational health and safety violations
- Environmental protection violations
- Human rights or labour rights abuses (including forced or child labour)
- Discrimination, harassment, or retaliation
- Privacy and personal data protection breaches
- Supply chain integrity or responsible sourcing concerns

4. Reporting Channels

Milan Jewellery provides multiple secure and accessible channels to submit reports:

- **Email:** compliance@milanjewellery.com
- **Web Hotline:** milanjewellery.com/hotline

Reports may be submitted **anonymously** or with identification. All reports are recorded and handled in accordance with confidentiality and data protection requirements.

5. Investigation and Handling Process

All reports received are subject to a structured and fair process:

1. **Initial Assessment** – Review of the report to determine scope and severity
2. **Investigation** – Impartial and confidential investigation by authorized personnel
3. **Corrective Actions** – Implementation of corrective and preventive measures
4. **Remediation** – Where harm is identified, appropriate remedial actions are taken
5. **Documentation** – Findings and actions are documented and retained

Investigations are conducted promptly, objectively, and without conflict of interest.

6. Confidentiality and Data Protection

Milan Jewellery ensures that:

- The identity of whistleblowers is protected to the maximum extent possible



- Information is disclosed strictly on a need-to-know basis
- All data is processed in compliance with applicable data protection laws

7. Protection Against Retaliation

Milan Jewellery strictly prohibits any form of retaliation, discrimination, harassment, or disadvantage against individuals who report concerns in good faith. Any act of retaliation constitutes a serious violation of company policy and may result in disciplinary action, including termination of employment or business relationships.

8. Roles and Responsibilities

- Senior Management is responsible for ensuring the effectiveness of this policy
- Compliance Function oversees reporting, investigation, and corrective actions
- Employees and Stakeholders are encouraged to raise concerns responsibly

9. Training and Awareness

Milan Jewellery provides:

- Regular training for employees on ethical conduct and whistleblower protection
- Awareness programs to promote use of reporting channels
- Communication of this policy to suppliers and business partners

10. Continuous Improvement

Milan Jewellery commits to:

- Periodic review of the whistleblower mechanism
- Incorporation of lessons learned from reported cases
- Alignment with evolving legal requirements and RJC standards

11. Policy Review and Update

This policy is reviewed at least annually and updated as necessary to reflect:

- Changes in laws or regulations
- Updates to RJC COP standards
- Organizational or operational changes

12. Conclusion

This Whistleblower & Grievance Mechanism Policy reflects Milan Jewellery's commitment to ethical integrity, transparency, and responsible business conduct.

By providing safe reporting channels and ensuring effective investigation and remediation, Milan Jewellery supports compliance with the RJC Code of Practices 2024 and fosters a culture of trust and accountability throughout its operations and supply chain.

APPROVED BY THE CEO AND THE BOARD OF DIRECTORS

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