

## RJC POLICY

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*Our policy reflects our MISSION, which encompasses a set of commitments regarding corporate integrity, labor rights, environmental management, and responsible sourcing. This policy has been adopted internally and is shared with all of our partners. To ensure compliance with ethical, safety, and environmental standards, the company is implementing an internal organizational system in accordance with the RJC COP requirements.*

**FERDIAM SRL** adheres to the applicable laws and relevant technical standards of its industry, ensuring constant updates and timely implementation.

**FERDIAM SRL** is pursuing certification to demonstrate compliance with the Principles and Code of Practices (COP) of the RJC, a fact we are keen to communicate to our stakeholders (employees, collaborators, suppliers, and customers), emphasizing the principles therein. This policy and the annual report will be publicly available on our website.

**FERDIAM SRL** requires its suppliers and external collaborators to comply with the principles and provisions of this policy. This policy underscores the importance the company places on acting with integrity and responsibility towards employees, business partners, public authorities, and all individuals with whom it interacts.

*We carefully assess risks, including those deriving from our business partners, by analyzing sensitive situations and implementing appropriate procedures and controls to respect human rights, social principles, and the environment.*

*The company's relationships with suppliers and external collaborators, in the pursuit of maximum competitive advantage, are based on loyalty, impartiality, and equal opportunity for all parties involved.*

*We do not tolerate any form of corruption towards public officials or any other party, in any form, and in any jurisdiction, even where such activities are commonly accepted, tolerated, or not legally prosecuted.*

*Bribery or the acceptance of any goods is strictly prohibited.*

*We do not tolerate money laundering or the financing of terrorist activities.*

*We are committed to Know Your Customer and Supplier practices and exercise the utmost vigilance within our supply chain, specifically regarding the supply of diamond powders containing precious metals.*

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*We are committed to adopting all reasonable control measures to ensure that we procure diamond powders from supply chains that adhere to the World Diamond Council (WDC) guidelines.*

*We are also committed to implementing the best possible solutions to ensure product security within the facility and during shipments to prevent theft, damage, or substitution.*

*We believe in the values of safety and the well-being of employees, visitors, and other relevant stakeholders who visit our company.*

*The company promotes values of equality and diversity, adhering to the highest standards of ethical behavior. We believe in and commit to respecting fundamental human rights and the dignity of each individual, as per the United Nations Universal Declaration of Human Rights.*

*We do not tolerate the use of child labor.*

*We commit to not engaging in any form of forced labor or restricting the freedom of movement of employees and workers.*

*We are committed to ensuring high health and safety standards within our company, in collaboration with the Occupational Safety Manager and the Workers' Safety Representative.*

*The company fosters the creation of a work environment that respects individuals. Our commitment to nurturing an inclusive culture that acknowledges the individuality of each employee or candidate translates into not discriminating based on race, ethnicity, caste, nationality, religion, physical or mental disability, gender, sexual orientation, union membership, political affiliation, marital status, physical appearance, or age, ensuring equal opportunities to all "fit for work" individuals based on their ability to perform the job without discrimination on unrelated factors, and refraining from any form of harassment.*

*The company has implemented an internal procedure that allows employees to report any irregularities, even anonymously, through a dedicated channel.*

*Should the principles outlined in this policy be violated, we will apply disciplinary measures in accordance with the provisions of the applicable national labor contract for the metalworking sector.*

*We are committed to respecting the current legislation regarding working hours and compensation.*

*Our company is also focused on adopting internal measures aimed at reducing the environmental impact of our activities, including:*

- *Absence of toxic substances in production processes;*
- *Minimizing the negative impact of our activities on the environment;*

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- *Responsible waste disposal;*
- *Reducing the consumption of paper, water, and energy.*

*OECD Policy:*

*We also commit to exercising our influence to prevent abuses and to promoting responsible conduct among our business partners, ensuring that they, too, observe ethically sustainable business practices in compliance with applicable laws and regulations.*

***Regarding serious abuses associated with the extraction, transport, and trade of gold and diamonds***

*We will not tolerate, profit from, or facilitate:*

- Torture, cruel, inhuman, and degrading treatment;*
- Forced or compulsory labor;*
- Child labor;*
- Human rights violations and abuses;*
- War crimes, violations of international humanitarian law, crimes against humanity, or genocide.*

***Regarding direct or indirect support to non-governmental armed groups***

*We will not tolerate direct or indirect support to non-governmental armed groups, including, but not limited to, procuring gold and diamonds, making payments, providing assistance, or supplying equipment to such groups or their affiliates who, unlawfully:*

- Control mining sites, transportation routes, or trading points for gold and diamonds;*
- Tax, extort money, or demand precious metals at mining sites, along transport routes, or at trading points.*

***Regarding active bribery or false statements about the origin of gold and diamonds***

*We will not offer, promise, or request bribes, and we oppose the solicitation of bribes, requests to conceal or misrepresent the origin of gold and diamonds, or false declarations regarding taxes, duties, tariffs, and royalties paid to governments for the extraction, trade, movement, transport, and export of gold and diamonds.*

***Regarding money laundering***

*We are committed to supporting efforts and contributing to the effective elimination of money laundering wherever we identify the risk of money laundering related to the extraction, trade, movement, transport, or export of gold and diamonds.*

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*We will immediately cease any engagement with upstream suppliers if we find that they are involved in or connected with any counterpart engaging in the abuses described in this policy. This policy is displayed at our operational headquarters and made publicly available on our websites: [www.ferdiam.it](http://www.ferdiam.it) and [www.diamart.com](http://www.diamart.com)*

*THE PRESIDENT  
ISIDORO FERRARI*

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