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## RJC POLICY

This document collects the ethical-social principles and values on which **LEM srl's** corporate policy is based and is aimed at employees, shareholders, customers, suppliers, external collaborators, business partners, and another person who can act in the name and on behalf of **LEM srl**.

### 1. Programmatic Policy

Founded in 1974, LEM is the inspirational part of the LEM INDUSTRIES Group, and over the course of 40 years, has become the world "reference" for the electroplating of accessories of the most significant brands in international fashion and luxury. LEM has always viewed the world differently from the rest of the galvanic production community. Over the course of many years, countless brand and luxury operators, from small-scale artisans to large firms and multinational corporations, have chosen to collaborate with LEM to achieve their products.

The registered address of LEM srl in Bucine, via Leo Valiani 45/47, Arezzo. LEM's activities are located in other four factories, also located in Bucine.

The RJC is an organization that sets standards to promote ethical behavior, human and social rights and good environmental practices throughout the diamond, gold and platinum jewelry supply chain.

RJC has developed a gold standard for the jewelry supply chain and credible mechanisms for verifying responsible business practices through third party audit.

Respect for the person, legality, worker protection and respect for the environment represent the ethical and social values that have always been part of **LEM srl's** corporate policy.

For these reasons, with the aim of improving the promotion and respect of these values, from 2023 LEM srl decided to become a Member of the Responsible Jewellery Council (RJC), a non-profit organization with regulatory tasks, established to promote ethically responsible, human rights, social and environmental practices throughout the diamond, gold and platinum chain.

RJC has developed a gold standard for the jewelry supply chain and a credible mechanism for ascertaining responsible business practices through third party verification.

As an RJC Member, LEM srl is committed to conducting its business in compliance with the RJC Code of Procedure (COP), as well as integrating ethical, human, social and environmental considerations into our daily activities, business planning and processes, decision-making.

As an RJC member, LEM srl is committed to obtaining the certification that attests the company's compliance with the standard.

To this end, we have formalized our RJC programmatic policy (available at [www.jessica-spa.com](http://www.jessica-spa.com)) by self-assessing the compliance of our activities with the RJC standard and taken all necessary measures to meet the requirements of the certification standard.

We make available to our customers and interested parties all the useful data to substantiate the results that our company has obtained from the application of this standard.

**LEM srl** carries out periodic checks to ascertain that the principles set out in this policy are effectively and effectively implemented and respected. To this end, the RJC Control Committee was set up consisting of three different liaison and control figures in the field of environment and safety, human rights and security.

### 2. Human Rights Policy and Social Policy

In addition to compliance with the reference legislation to which it is subject in all the countries in which it operates, **LEM srl** is committed to identifying, mitigating and, where possible, preventing potential violations of human rights linked to its activities. To this end, LEM srl declares to:

- undertake to support the protection and protection of human rights and fundamental freedoms according to the principles stated in the Universal Declaration of Human Rights of 1948 and in subsequent international conventions on human rights;
- recognize and respect the principles established by the fundamental conventions of the ILO "International Labor Organization" and in particular the right of association through the free registration of workers in trade unions, the prohibition of forced and child labor through employment relationships exclusively related to Ccnl
- Do not tolerate any form of discrimination in the workplace in terms of employment, pay, overtime, access to training, promotion, termination of employment or retirement based on race, ethnicity, caste, nationality of origin, religion, different abilities, sex, sexual orientation, union membership, political affiliation, marital status, pregnancy, physical appearance, AIDS, or age, or any other applicable basis prohibited by applicable labor and workers' rights legislation;
- undertake not to practice corporal punishment and to prohibit degrading treatment, abuse, coercion and any form of intimidation;
- undertake not to procure material in areas where there are armed conflicts, widespread violence or other risks of harm to human rights.

**LEM srl** is committed to supporting the development of the communities where it operates, with the aim of contributing to the economic and social well-being of the area. The company promotes charitable and solidarity initiatives and provides its own contribution and support to redevelopment projects of the community's artistic and cultural heritage.

### 3. Commercial, Anti-Corruption, Anti-Bribery and Anti-Money Laundering Policy

**LEM srl** undertakes to carry out and conduct its business with the utmost respect for ethical standards, guaranteeing integrity, transparency and compliance with current laws. To this end, the Company declares its commitment to:

- Not to practice subordination, corruption, extortion and contribute to the fight against such crimes and unfair practices;
- Not to accept payments, gifts, discounts, advantages or promises and / or other utilities that can even be interpreted as exceeding normal commercial or courtesy practices and that can influence the independence of judgment or induce to ensure any advantage or treatment of favor;
- Not to carry out transactions and / or operations that could compromise the principles of fair competition and competition or that could constitute an attempt to influence business or decision-making processes;
- Avoid conflicts of interest;

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- Not tolerate money laundering and the financing of terrorist activities;
- apply adequate due diligence that takes into account the risk associated with the counterpart before starting any commercial relationship and carefully monitor our supply chain and exercise "Know Your Counterpart" activities;
- make known in full and in detail the characteristics of the precious metals sold and ensure the correspondence of weight, functionality, finish and title of their products, ensuring compliance and quality through systematic checks with effective and cutting-edge precision tools;
- adopt adequate systems and measures to ensure the integrity and safety of product shipments as well as to prevent theft, damage and replacements;
- respect the rights of consumers by applying fair business, advertising and marketing practices and by adopting the necessary measures to guarantee the safety and quality of its products;
- respect the principle of confidentiality and protection of personal data based on current legislation
- implement the OECD Due Diligence Guidance Annex II framework as a management process for risk based due diligence for responsible supply chains of minerals from conflict-affected and high-risk areas.

#### 4. Environmental Policy

**LEM srl**, aware that the commitment to environmental protection and sustainable development represents an important value of business ethics, undertakes to carry out its activities in full respect of the environment and in compliance with current legislation, to have an effective emergency plan in the event of harmful consequences for the environment deriving from their activities.

With this in mind, the company undertakes to responsibly and correctly dispose of the waste produced, to use energy efficiently, and in any case to minimize the impact of its activities on the environment.

#### 5. Occupational Health, Safety and Hygiene Policy

LEM srl promotes the appropriate actions necessary to protect the safety and health of its workers and people who come into contact with the company, and to this end is committed to:

- Comply with current legislation on health, safety and hygiene in the workplace;
- train and inform employees;
- prepare and maintain a system for identifying and controlling risks to the health and safety of workers;
- define and implement technical, organizational and managerial interventions in order to prevent - where possible - and / or reduce the risks inherent in the health and safety of workers in the workplace;
- ensuring and maintaining the safety and well-being of employees, visitors, customers and suppliers.

#### 6. Security Policy

**LEM srl** is committed to protecting both its own and others' industrial property. In this regard, LEM srl has prepared special procedures aimed at protecting against theft, damage or replacement of products within its premises and during shipments.

LEM srl also informed its employees on the importance and duty of respecting the confidentiality and industrial property of both the company and its business partners.

Finally, **LEM srl** undertakes to:

- Respect the mandatory regulations;
- Periodically review this Policy;
- Establish measurable goals of compliance from the RJC code;
- Communicate these objectives to all interested parties;
- Implement all the necessary actions to identify and eliminate potential gaps between the planned policy and the company practices actually carried out.

Bucine, 03/10/2022

The legal representative