

Superoro Srl, an Italian limited liability company operating in the field of design and production of jewellery, accessories and watches, declares its commitment to managing and developing its business with a constant attention and continuous improvement of quality services in respect of human rights, business ethics, health-and-safety in the workplace, and environmental protection.

In implementing and managing its Organisational System, the company is therefore committed to adopting the principles of the Responsible Jewellery Council to responsibly self-manage itself.

The Organisational System, which applies to all of its work, is based on the following commitments by the Management:

- proactively listen to our customers' requirements;
- comply with the defined standards and orientation towards continuous improvement;
- ensure the quality level of our products over time, and meet the needs and expectations of our customers and other interested parties by ensuring maximum compliance with the requirements;
- share, at all levels, the awareness of the importance of the System by disseminating operational documentation for the planning and implementation of our services;
- systematically guarantee the environmental compatibility and safety in the workplace of the business carried out and the services provided, in compliance with national and international regulations;
- seek the optimisation of business processes to achieve the highest level of effectiveness and efficiency;
- comply with all applicable international, national, regional and municipal legal requirements concerning the environment and safety in the workplace, and any other requirements we may wish to adhere to voluntarily;
- pursue continuous improvement in our environmental performance;
- ensure the transparency and correctness of the information made available to our internal and external stakeholders;

Being aware of the social responsibility to which companies must respond in order to achieve lasting and sustainable growth, Superoro Srl applies the management requirements of the Responsible Jewellery Council, and is committed to applying and promoting ethics and respect for human rights and social practices in a transparent and responsible manner.

The application of the Responsible Jewellery Council Standard involves a number of commitments, which can be identified as indicated below.

Business ethics and a responsible supply chain

The company is committed to:

- carrying out our work in the utmost respect for ethical standards, guaranteeing integrity, transparency and compliance with current laws;
- complying with all due-diligence obligations vis-à-vis our counterparts by strictly applying the principles of 'Know Your Customer';
- not tolerating any form of corruption and/or money laundering, and ensuring that any suspicious practices are disclosed and challenged;
- making clear, in full and in detail, the characteristics of our products and services;
- ensuring the traceability of the precious metals and gems we use to make our products, to guarantee that they do not derive from illicit sources or areas of armed conflict fuelled by the proceeds of their sale;



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- ensuring the respect of our supply chain through direct and constant monitoring of all our counterparts so that they take any action to mitigate risks arising from their procurement activities;
- working to the best of our knowledge, and based on written assurances from our suppliers, that the diamonds and gemstones used have been sourced from legitimate sources not involved in conflict financing;
- making all our stakeholders aware of the importance of a monitored, responsible and carefully managed supply chain.

Human Rights

The company is committed to:

- upholding the United Nations Universal Declaration of Human Rights;
- not using child labour or any form of forced or compulsory labour;
- guaranteeing high safety standards in the workplace in accordance with national and international regulations;
- not discriminating in any way, or applying any form of degrading treatment, harassment, abuse, coercion or intimidation;
- promoting the importance of transparent communication at all levels of the organisation by encouraging the possible reporting of improper behaviour by anyone working in the name and on behalf of the company;
- complying with current labour legislation and overseeing compliance with it;

During the period of Certification of the RJC Code of practices, no departures were noted from the Code of practices, no complaints or reports were received from counterparties, and no risky transactions were found in the supply chain according to the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk areas".

All our products are made from recycled gold.

The Company Policy is communicated to all internal and external counterparts and made available to anyone who requests it.

Monticello C.Otto, 12/07/2021

The Management