

Policy for Social Responsibility and Human Rights

CLARIMOND MANIFATTURA adopts a Policy aimed at improving the working conditions of its personnel and involving its suppliers in this regard. The company's social responsibility policy is based on the OECD guiding principles and includes the following due diligence procedure:

1. Risk Identification and Assessment:

- We map the supply chain to identify all parties and processes involved.
- We assess risks regarding human rights compliance, environmental impact, corruption, and other social issues, with particular attention to critical materials like diamonds and gold.

2. Supplier Auditing and Verification:

- Request certifications and documentation to prove compliance with RJC requirements, ensuring practices align with OECD guidelines.
- Conduct regular audits and inspections at suppliers considered high-risk.

3. Engagement and Collaboration:

- Establish ongoing dialogue with suppliers and promote targeted training to ensure our ethical standards are understood and implemented.

4. Response to Findings:

- Develop corrective action plans in case of non-compliance, and if necessary, terminate commercial relationships with suppliers who do not meet our standards.

5. Reporting and Transparency:

- Accurately document all due diligence process phases and create periodic reports that illustrate activities performed and progress achieved.

General Principles of the Policy*

- Respect for Human Right: We operate with full respect for Human Rights and adhere to the United Nations principles on business and Human Rights.
- Work Environment: We aim for the continuous improvement of working conditions and the full satisfaction of our employees.
- Sustainable Development: We support the development of local communities and are committed to improving living conditions in the areas where we operate.
- Stakeholder Engagement: We are open to dialogue with all stakeholders and regularly assess our policy for continuous improvement.



- Policy Communication: Our policy is documented, active, and communicated to all staff and available to the public upon request.

This policy and the due diligence procedure demonstrate CLARIMOND MANIFATTURA S.r.l. commitment to operating with integrity, transparency, and an unwavering commitment to social responsibility.

ROME, 10.07.2024

The Management