

A black and white photograph of a woman in profile, looking upwards and to the right. Her hand is raised to her face, with fingers gently touching her cheek and temple. She is wearing a large, teardrop-shaped earring and a ring on her ring finger. Her hair is dark and pulled back. The background is blurred, showing some foliage and a building. The overall mood is serene and contemplative.

BRUNA

2022

HUMAN RESOURCES POLICY

BRUNATHELABEL.COM

INTRODUCTION

*Ever since the brand was established,
our vision at BRUNA has been to create jewelry
with a positive impact on our ecosystems.*

Each single person of the BRUNA team has a role to play to contribute to this vision. For this reason, it is important to us to enable the BRUNA team to achieve their best, through employee satisfaction, development and wellbeing.

This policy defines our commitments in relation to human resources management, in line with our broader commitments set out in our Environmental, Social and Governance (ESG) Policy, as well as our human rights commitments outlined in our Human Rights Policy.

As we do our part to create a positive, healthy, and stimulating work environment, we expect that each member of the BRUNA team upholds our commitments. Our expectations for the BRUNA team are articulated in BRUNA's Code of Conduct.

SCOPE

This policy applies to all employees, managers, and directors at BRUNA, as well as contractors under BRUNA's direct supervision (hereafter, the BRUNA team or the team), as appropriate based on contractual arrangements.

OUR COMMITMENTS

VOLUNTARY EMPLOYMENT

We commit to ensuring that employment is freely chosen, always. We will neither tolerate nor profit from, contribute to, assist or facilitate the commission of any form of forced or compulsory labor.¹

GENERAL EMPLOYMENT TERMS

All team members are provided with written and understandable information about their employment conditions, including in respect to wages, working hours, and paid leave, before they enter employment.

We will not avoid our obligations to employees under labor or social security laws and regulations arising from the regular employment relationship through the use of labor-only contracting, sub-contracting, apprenticeship schemes, or excessive use of fixed-term contracts of employment where there is no real intent to impart skills or provide regular employment.

FREEDOM OF ASSOCIATION & COLLECTIVE BARGAINING

We commit to respecting freedom of association and the right to collective bargaining. The team, without distinction, has the right to join or form trade unions of their own choosing and to bargain collectively.

Team representatives are not discriminated against and have access to carry out their representative functions in the workplace.

Where the right to freedom of association and collective bargaining is restricted under law, we will facilitate, and not hinder, the development of parallel means for independent and free association and bargaining.

CHILD LABOR

We commit to neither tolerate nor profit from, contribute to, assist or facilitate the commission of any of the worst forms of child labor² nor any form of child labor.³

FLEXIBLE WORK ARRANGEMENTS

To the extent possible, we commit to providing the team with options for flexible work arrangements that foster their work-life balance, as necessary, given each person's individual circumstances.

These include but are not limited to: part-time work, graduated return to work for team members returning from parental leave, work from home, and compressed hours. Team members adopting any of these flexible work arrangements will be treated no less favorably than any other team member, including with regards to career advancement.

RECRUITMENT & CAREER ADVANCEMENT

We commit to recruitment and career advancement opportunities that are made on the basis of merit, and to ensuring that our recruitment process remains accessible and non-discriminatory.

When a job position opens at BRUNA, we encourage internal promotion and hiring for advanced positions, where appropriate, given the necessary knowledge, skills and experience needed.

INDUCTION, TRAINING & DEVELOPMENT

We commit to providing the team with adequate induction and training to do their job competently, including but not limited to: internal on-the-job training, the provision of written instructions such as standard operating procedures, coaching, external training and online courses. Internship or apprenticeship programs will imply a clear definition of the program objectives and learning outcomes.

PERFORMANCE MANAGEMENT

We commit to undertaking performance reviews, both formal and informal, regularly, to support the team in improving performance and ensure a fair process for career advancement.

WAGES & BENEFITS

We commit to wages and benefits that meet, at a minimum, the local living wage.

WORKING HOURS

We commit to working hours that meet, at a minimum, national legal standards, collective agreements, and the provisions of the relevant ILO conventions⁴, whichever affords the greater protection for workers.

LEAVE

We commit to providing paid leave that meets, at a minimum, national legal standards, collective agreements, and the provisions of the relevant ILO conventions,⁵ whichever affords the greater protection for workers. Paid leave includes, but is not limited to: annual leave, personal sick leave, carer's leave, compassionate leave, and parental leave (see dedicated section).

PARENTAL LEAVE & RETURN TO WORK

We are committed to providing parents (including a de facto or same sex partner, or single person who is expecting a child or adopting a child) with parental leave in line, at a minimum, with national legal standards, collective agreements, and the provisions of the relevant ILO conventions, whichever affords the greater protection for workers.

We will not distinguish between primary and secondary caregiving, and are committed to provide equivalent time and pay to team members who are newly parents irrespective of their sex or gender.

We recognize, to the extent possible, the parent's right to return to the job they held prior to going on leave, including any promotion.

FAIR & EQUAL TREATMENT

We commit to equality of opportunity and treatment in respect of employment and occupation. This includes equal remuneration for men and women workers for work of equal value, and avoiding any form of discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, national origin, religion, age, disability, sex, gender, sexual orientation, union membership or political affiliation, or any other distinction, exclusion or preference which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation.

Beyond equality of opportunity, we see diversity as a value to be protected and encouraged with concrete actions. We welcome opportunities to promote diversity and inclusion in our team, including but not limited to opportunities that promote gender parity and interculturalism, and the creation of job opportunities for people with disabilities.

We are committed to providing a workplace that is free from harassment, including but not limited to sexual harassment⁶, and bullying.⁷

Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation are prohibited. We will not permit deductions from wages as a disciplinary measure.

PREGNANCY & BREASTFEEDING

To the extent possible, we are committed to supporting mothers during pregnancy, including for example by considering options to reduce hours or change duties where necessary to ensure safety at work. Appropriate options will be considered on a case-by-case basis, and will not impact the mother's parental benefits.

After birth, we are committed to providing mothers with the support they need, including by accommodating breastfeeding as appropriate.

HEALTH, SAFETY & WELLBEING

We are committed to health and safety in the workplace. This includes providing the team with the necessary knowledge, tools, and support to promote health and safety in home offices. We are also committed to fostering the wellbeing of the team, including both mental and physical.

ENVIRONMENTAL, SOCIAL & GOVERNANCE RESPONSIBILITY

We are committed to enabling our team to contribute to BRUNA's environmental, social, and governance responsibility objectives as part of their day-to-day work as well as in their personal life, as appropriate. This includes, for example, avoiding printing unless strictly necessary and adopting the three Rs (reduce, reuse, recycle) of waste management in home offices.

GROSS OR SERIOUS MISCONDUCT

We are committed to addressing gross or serious misconduct requiring, as a last resort, employment termination or dismissal, responsibly, in a fair manner, in line with all applicable laws and regulations.

GOVERNANCE & GRIEVANCES

This policy is reviewed for effectiveness and relevance every year and when new circumstances arise by the ESG Manager, and it is endorsed by BRUNA's top management. Regular training is conducted on this policy and its applications for all relevant team members to ensure effective implementation and continuous improvement.

In the spirit of transparency, this policy is published on our website, and regularly communicated both internally and to our business partners.

BRUNA supports the right of every team member to lodge a grievance should they believe that any of the rights or benefits described in this policy may have been violated.

The team is encouraged to submit any grievance to their line manager, or to the ESG Manager at: esg@brunathelabel.com. Each grievance will be thoroughly investigated, and appropriate actions taken, in line with our grievance mechanisms and whistleblowing procedures.

¹As defined by the ILO Convention No. 29 on Forced Labour (1930), "all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily".

²As defined by the ILO Convention No. 182 on the Worst Forms of Child Labour (1999), these include: (a) all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour, including forced or compulsory recruitment of children for use in armed conflict; (b) the use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances; (c) the use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs as defined in the relevant international treaties; (d) work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.

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⁴ILO Hours of Work (Industry) Convention, 1919 (No.1); ILO Weekly Rest (Industry) Convention, 1921 (No. 14); ILO Holidays with Pay Convention, 1970 (No. 132).

⁵ILO Hours of Work (Industry) Convention, 1919 (No.1); ILO Weekly Rest (Industry) Convention, 1921 (No. 14); ILO Holidays with Pay Convention, 1970 (No. 132).

⁶Sexual harassment includes physical, verbal or non-verbal conduct, which is unwelcome, unreasonable, and offensive to the recipient and creates an intimidating, hostile or humiliating working environment for the recipient.

⁷Workplace bullying may include behavior that is directed towards an employee, or group of employees, that creates a risk to health and safety e.g. physical and/or verbal abuse, excluding or isolating individuals; or giving impossible tasks.

Signature of the CEO



Date: 07 / 12 / 22