

A black and white close-up photograph of a woman with blonde hair, looking upwards and to the left, holding a white flower near her nose. She is wearing a pearl necklace and a pearl earring. The background is blurred.

BRUNA

2022

**BRUNA'S CODE OF CONDUCT**

[BRUNATHELABEL.COM](https://brunathelabel.com)

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## MESSAGE FROM THE FOUNDERS

*“Love & kindness are never wasted”*



*“Love and kindness are never wasted”* - this is the belief that has always guided us as we built the BRUNA brand over the past few years. Positivity and kindness are the foundation of our culture, and accompany us on our day-to-day work, both internally within our team, and externally as we interact with our beloved customers and trusted partners.

We truly believe that life is more beautiful if you are gentle, friendly and give love to others. Some may say that, to be successful, you need to be tough, and that kindness is a form of weakness. The success of our team over the past three years proves them wrong. Kindness is what creates a safe space for us to grow as a team. It is what empowers us, individually and collectively. And collective empowerment is what we need, if we aim to achieve BRUNA's ambitious vision and

contribute to the Sustainable Development Goals of the United Nations for the planet, people, and prosperity.

These are the values that you will find embedded in this Code, which provides a framework for what is expected from each of us in our professional activities. It is by abiding by the values and standards of conduct that are described in this Code that we can turn our environmental, social, and governance commitments into concrete action, and together contribute to a responsible jewelry brand that has a positive impact on our ecosystems.

With love,  
Helena & Simon

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

## **FOREWORD**

To have a positive impact on ecosystems means to create value for our stakeholders, including the team, our customers, our suppliers and other business partners, as well as the natural environment, and future generations.

It is both our individual and collective responsibility to uphold BRUNA's vision and commitments. As members of the BRUNA team, each single one of you has a role to play to contribute to this vision. Through the power of personal example and ethical conduct, we can demonstrate that creating beautiful jewelry pieces with a positive impact is not a dream, rather, it is a possible reality.

## **ABOUT THIS CODE**

### **WHO DOES THIS CODE APPLY TO?**

This Code of Conduct applies to all employees, managers, and directors at BRUNA, as well as contractors under BRUNA's direct supervision (hereafter, the BRUNA team or team or you).

If you are a supplier or other type of business partner, refer to our Code of Conduct for Business Partners.

### **WHAT IS THE PURPOSE OF THIS CODE?**

In your day-to-day work, you may have come across decisions that made you wonder: what is right, and what is wrong? Sometimes, the answer may seem obvious. Other times, the answer may lay in a 'gray area,' and require a discretionary decision. Sometimes,

the answer may seem unanimous. Other times, our culture and customs may influence the way we respond to a specific scenario.

This Code of Conduct articulates BRUNA's vision, mission, and values, and expectations for our team. By translating our commitments into practical dos, don'ts, and examples of day-to-day scenarios, the ultimate goal of this Code is to ensure that we, as a business and as individuals, always act in line with the vision, mission, and values of the brand.

### **WHAT SHOULD I DO IF IN DOUBT?**

While we hope that this Code will help guide you in your day-to-day work at BRUNA, we acknowledge that it cannot anticipate and address every single situation that may arise as you fulfil your responsibilities at BRUNA. When in doubt, try answering the following questions:

- Is this (decision, practice, etc.) legal?
- Is it in line with BRUNA's vision, mission, and values?
- Is it in line with BRUNA's commitments?
- Is it in line with the principles of business conduct articulated in this Code?
- Does it respect the rights of others?
- Would I be comfortable if it was made public, within the team and/or externally?

If still in doubt, please consult with your manager, the Human Resources Manager, or the Environmental, Social and Governance (ESG) Manager.

## WHAT SHOULD I DO IF I KNOW OF OR SUSPECT ANY CODE VIOLATION?

We encourage all team members to ask questions and raise issues without fear of retaliation. Please report any suspected unethical, illegal, or suspicious behavior immediately through one of the following reporting channels:

- Your team lead, or
- The Human Resources Manager, or
- The ESG Manager.

Should you prefer to report any known or potential Code violation anonymously, please fill out the form available [here](#). Each report of misconduct on the part of BRUNA, a team member, or a third party with which BRUNA is in contact will be thoroughly investigated, and appropriate actions taken, in line with our grievance mechanisms and whistle blowing procedures.

We do not tolerate retaliation against any person who makes a report of known or suspected Code violation in good faith<sup>1</sup>, or who otherwise assists with an investigation.

Team members who report a concern in good faith will not be subjected to any adverse employment action including, but not limited to:

- Unfair dismissal, demotion, suspension.
- Unfair denial of a promotion, or other employment benefit.
- Bullying, harassment, or exclusionary behavior.

If you believe that you are being retaliated against because of a report you have made, or because of your collaboration in an investigation, please notify us immediately through one of the reporting channels

indicated above. Again, each report of retaliation, discrimination or harassment will be thoroughly investigated, and appropriate actions taken.

## MONITORING & IMPLEMENTATION OF THE CODE

This Code is implemented at BRUNA through the support of relevant internal protocols and procedures. Training is provided to all team members on the Code and its practical implementation.

The effective implementation of this Code is monitored on an ongoing basis by the ESG Department, with the support of all relevant functions.

We expect cooperation from all employees in conducting themselves in a professional, ethical manner, as described in this Code. This includes reporting any Codes violation and cooperating fully in any potential investigation.

Any team member in breach of this Code may be subject to disciplinary action, including, as a last resort and in the most severe circumstances, employment termination.

## CODE & LEGAL COMPLIANCE

This Code does not replace legislation and, if any part of it is in conflict, then legislation takes precedence. When national legislation or other applicable regulations and this Code address the same topics with different standards, the highest standards and the most restrictive provisions apply.

## ABOUT BRUNA

*BRUNA's story began when our founders Helena and Simon discovered rare Keshi pearls during their travels through the French Polynesian islands.*

### OUR HISTORY

These unique, natural pearls are considered a by-product in pearl farming's search for perfection, which just didn't seem right to Helena. This discovery of something so beautiful that was unfairly destined to be thrown away sparked a unique idea. A small bag of pearls and a whole lot of inspiration later, BRUNA was to become the answer to her endless search for conscious, long-lasting jewelry.

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### MISSION

We inspire and make everyday looks outstanding and conscious by creating high quality and responsibly made jewelry.

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### VISION

Jewelry with a positive impact on our ecosystems.

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### CORE VALUES

According to our guiding principles and fundamental beliefs we defined our company's core values. These are the values we truly honor and we are living up to in our daily work. Every decision we make should be aligned with and based on these values.

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### COMMITMENT

We take our accountabilities and responsibilities by heart and fulfill them with passion and commitment to reach for the best.

### LONG-TERM IMPACTS BEFORE SHORT-TERM GAINS

We have clear values which we implement in an authentic way through sustainable economic activities. A long-term positive impact for humans, nature and the company has always top priority.

### SELF-STARTER & GOAL-GETTER

We get things done autonomously, think solution oriented, act fast and deliver consistently the highest quality of work to achieve our goals. We challenge the status quo and leave our comfort zone ongoing.

### SUPPORT

We can only drive our mission and achieve the vision as a cohesive team. Therefore we are highly supportive, challenging and kind to each other. As a team we are all pulling on one string.

## BRUNA'S COMMITMENTS



### POLICIES & REFERENCE STANDARDS

Bruna's commitments to responsible business conduct are aligned with all applicable laws and regulations, and inspired by international best practice standards and sustainability frameworks, including, but not limited to:

- the Sustainable Development Goals of the United Nations,
- the International Bill of Human Rights<sup>2</sup>,
- the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work<sup>3</sup>,
- the OECD Due Diligence Guidance for Responsible Business Conduct,
- the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas for mineral supply chains.

Our commitments are articulated in our Environmental, Social, and Governance Policy, as well as in topic-specific policies including:

- our Human Resources Policy;
- our Human Rights Policy;
- our Responsible Supply Chains Policy;
- our Responsible Marketing, Advertising and Product Disclosure Policy.



## UPHOLDING BRUNA'S COMMITMENTS

### ENVIRONMENTAL, SOCIAL & GOVERNANCE RESPONSIBILITY

We commit to:

- Protecting and restoring natural ecosystems.
- Inspiring and empowering the BRUNA community.
- Challenging and championing a better jewelry industry.

See Environmental, Social, and Governance Policy.

#### AS A MEMBER OF THE BRUNA TEAM, PLEASE REMEMBER TO:

- Comply with any applicable legal or regulatory requirements.
- Contribute to BRUNA's Environmental, Social, and Governance commitments, as appropriate given your business function.
- Consider actions that reduce the impacts of our work on the environment, including when working from home and during business travels.
- Consider actions that can influence the team and our community's awareness of environmental and social issues, and use such influence as a force for good.

#### PLEASE REMEMBER NOT TO:

- Knowingly engage in actions that go against BRUNA's Environmental, Social, and Governance commitments.

### HUMAN RIGHTS

We commit to respecting internationally recognized human rights standards, throughout our operations and supply chains.

See Human Rights Policy.

#### AS A MEMBER OF THE BRUNA TEAM, PLEASE REMEMBER TO:

- Respect the rights of others, including any member of the BRUNA team or broader BRUNA community.
- Promote BRUNA's human rights commitments, as appropriate given your business function, for example by using our influence over our community as a force for good, to raise awareness and share knowledge with others.

#### PLEASE REMEMBER NOT TO:

- Undertake any action which may infringe on the rights of others, with respect to any other member of the BRUNA team or broader BRUNA community.

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### FAIR & EQUAL TREATMENT

We commit to:

- Equality of opportunity and treatment in respect of employment and occupation<sup>5</sup>.
- Welcoming 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.
- Providing a workplace free from harassment, including but not limited to sexual harassment, and bullying.
- Cultural-sensitive marketing and advertising that align to our commitment to equity, diversity and inclusion, and reflect the diverse beauty of our community (see section Marketing and Advertising).

See Human Rights Policy, Human Resources Policy and Responsible Marketing, Advertising and Product Disclosure Policy.



**AS A MEMBER OF THE BRUNA TEAM,  
PLEASE REMEMBER TO:**

- Treat all colleagues, community members, and any other person with respect, as you would like to be treated.
- Support and promote BRUNA's commitment to diversity, equity, and inclusion.
- Communicate to Human Resources any romantic relationships that may be established - with mutual consent - between you and a co-worker, if one reports to the other or is in a position of authority or control over the other person.

**PLEASE REMEMBER NOT TO:**

- Take any discriminatory action, including but not limited to decisions on hiring, compensation, training, promotions, terminations, and retirement.
- Knowingly hurt, harass, including sexually harass<sup>6</sup>, or bully<sup>7</sup> any member of the team or broader BRUNA community.
- Knowingly humiliate or intimidate any member of the team or broader BRUNA community.
- Physically or socially isolate any member of the team or broader BRUNA community.
- Engage in any physical contact, emails, jokes, looks and other gestures, comments, invitations or requests of a sexual nature.
- Undertake any behavior that you have been notified to be unwanted or unwelcome.
- Attempt to convert others to your religious belief.

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**RESPONSIBLE BUSINESS  
PARTNERSHIPS & BUSINESS INTEGRITY**

We are committed to building partnerships that are based on trust and integrity. This includes avoiding any form of corruption, money-laundering, bribery, facilitation payments, and unfair competition.

See Responsible Supply Chains Policy.

**AS A MEMBER OF THE BRUNA TEAM,  
PLEASE REMEMBER TO:**

- Disclose to your team lead any potential conflict of interests which might influence or appear to influence your judgment.
- Ensure that all gifts offered to influencers, content creators, suppliers, or any other business partners are appropriate and accurately recorded, in line with BRUNA's policies and procedures.
- Immediately disclose to your team lead any gift that you have received from an influencer, content creator, supplier, or any other business partner.
- Communicate to your team lead, the ESG Manager or via the grievance mechanism and whistleblowing procedures any attempt of bribery or extortion you may be subject to from the part of a business partner.
- Protect the suppliers' and other business partners' confidential information as though it were our own.
- Cooperate with any internal or external auditors, or legal authority as appropriate.
- Inform your team lead or Human Resources of your participation, if any, in political activities that may create confusion between your personal views and those of BRUNA.

**PLEASE REMEMBER NOT TO:**

- Offer, promise, give, or receive directly or indirectly anything of value to/from any government official/entity, person, or commercial entity, knowing that the purpose of this action was to influence any act or decision to assist in obtaining or retaining a business advantage.
- Accept gifts unless they are authorized by management according to BRUNA's policies and procedures.
- Accept or give cash gifts.
- Induce suppliers or other business partners to breach contracts with competitors.
- Collect competitive information through illegal means and/or by failing to identify yourself clearly as a BRUNA employee when collecting such information.
- Conceal any potential conflict of interests.
- Use BRUNA's funds and resources (including BRUNA's time, phones, paper, e-mail and other assets) to carry out or support your personal political activities.



## RESPONSIBLE SUPPLY CHAINS

We commit to:

- Complying with all applicable laws, regulations, and conventions, as well as with industry best practices.
- Building long-term partnerships with suppliers that uphold our environmental, social, and governance commitments, including but not limited to the following areas: environmental protection, human rights, labor rights, workplace health, safety and business integrity.
- Building partnerships that are based on trust and integrity. This includes avoiding any form of corruption, money-laundering, bribery, facilitation payments, and unfair competition (see section Responsible Business Partnerships and business integrity).
- Using our supply chain management practices as a force for good.

See Responsible Supply Chains Policy. Please refer to the policy for specific commitments related to our minerals and metals supply chains.

### AS A MEMBER OF THE BRUNA TEAM, PLEASE REMEMBER TO:

- Communicate BRUNA's expectations of business partners, as appropriate given your business function.

- Select suppliers or other business partners on the basis of competitive bidding, fairly and without favoritism.
- Promptly disclose to the ESG Manager any concerns with regards to the environmental, social, or governance performance of a supplier or other business partners, including but not limited to concerns related to the potential infringement of human rights at the premises of the business partners and/or along the supply chain.

### PLEASE REMEMBER NOT TO:

- Impose abusive conditions on suppliers (namely In terms of payment, deadlines, etc.).
- Continue to work with a supplier or other business partner who does not meet BRUNA's expectations as per our Responsible Supply Chains Policy and Code of Conduct for Business Partners, after failed attempts at mitigation.
- Continue to work with a supplier or other business partner should you become aware of reasonable risk that the business partner is associated with serious abuses or conflict financing.

## PRODUCT DISCLOSURE

We commit to the proper, complete and accurate disclosure of all relevant information about our jewels, in line with applicable legal requirements as well as good practice industry guidelines developed by industry and standard-setting organizations.

See Responsible Marketing, Advertisement, and Product Disclosure Policy.

### AS A MEMBER OF THE BRUNA TEAM, PLEASE REMEMBER TO:

- Comply with any applicable legal requirements for product disclosure.
- Align with relevant international standards for product disclosure and representations, for example, those developed by the World Jewellery Confederation (CIBJO) as articulated in the CIBJO Blue Books and the product disclosure requirements of the Responsible Jewellery Council (RJC) Code of Practices (COP) Standard and the ISO Standards.
- Follow internal validation processes for product disclosure and claims even if it delays a product launch.
- Ensure that all product disclosure is based on proven performance and factual data.
- Give a fair, precise and truthful description of our products and their effects, as specified in BRUNA's communications guidelines.

### PLEASE REMEMBER NOT TO:

- Make any untruthful, misleading or deceptive representation.
- Make any material omission in the selling, advertising or marketing any gold, silver, or other materials, jewelry products, diamonds, coloured gemstones, or treated, laboratory-grown, reconstructed, composite or simulant diamonds or coloured gemstones.
- Seek to exploit the potential lack of knowledge or lack of experience of consumers.
- Deliberately exaggerate claims in our communications, including environmental or societal claims.

## MARKETING & ADVERTISING

We commit to:

- Full honesty in our marketing and advertising campaigns.
- Cultural-sensitive marketing and advertising that align to our commitment to equity, diversity and inclusion, and reflect the diverse beauty of our community.
- Permission-based email marketing, responsible digital advertising, and white hat search engine optimization that provides valuable and useful content that aligns with what users and search algorithms are looking for.

See Responsible Marketing, Advertisement, and Product Disclosure Policy.

### AS A MEMBER OF THE BRUNA TEAM, PLEASE REMEMBER TO:

- Only use words that are realistic descriptors of the products, services, or impact we are promoting.
- Respect BRUNA's communications guidelines.
- Represent people with dignity and respect.
- Promote equity, diversity and inclusion in the choice of images, partners, narratives, and wording in our marketing and advertising materials, including but not limited to promoting and empowering minorities, women, members of the LGBTQ+, people with disabilities.
- Be transparent when the content of an influencer marketing campaign is a paid promotion.
- Be sensitive to the possible reaction of religious, ethnic, cultural or social groups to our advertising.
- Protect our customers' personal data and abide by BRUNA's privacy policy for the collection and storage of private information.
- Maintain the trust of email lists by continuing to offer value and restricting messaging to content related to what the original opt-in intent was and always provide the option to opt-out.



## PLEASE REMEMBER NOT TO:

- Engage in any form of false advertising, advertorial advertising<sup>8</sup>, false or tempered reviews and testimonials, and inflated analytics.
- Engage in any form of exploitation, appropriation, or stereotyping of underrepresented or historically oppressed people or groups within marketing content.
- Engage in any form of greenwashing and impact washing.
- Collect information for behavioural marketing purposes without first informing our customers (e.g., using cookies).

<sup>1</sup>"Good faith" means that you have provided information that you believe to be comprehensive, honest and accurate at the time, even if you are later proven to be mistaken.

<sup>2</sup>The "International Bill of Human Rights" consists of the Universal Declaration of Human Rights and the main instruments through which it has been codified: the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights.

<sup>3</sup>With the adoption in June 1998 of the ILO Declaration on Fundamental Principles and Rights at Work all 174, ILO member states have an obligation, regardless of ratification, to respect, promote and realize the principles contained in the core ILO Conventions. These core Conventions and their accompanying Recommendations comprise: ILO Conventions 29 and 105 & Recommendation 35 (Forced Labour), ILO Convention 87 (Freedom of Association), ILO Convention 98 (Collective Bargaining); ILO Conventions 100 and 111 (Equal Remuneration and Workplace Discrimination); ILO Convention 138 (Minimum Age); ILO Convention 182 (Worst forms of Child Labour); ILO Conventions 155 and 187 (Occupational Safety and Health).

<sup>4</sup>Internationally recognized human rights include at a minimum those enshrined in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, covering: freedom of association and collective bargaining, forced labor, child labor, discrimination, employment terms, and workplace health and safety.

<sup>5</sup>This includes providing 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.

<sup>6</sup>Sexual 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.

<sup>7</sup>Workplace 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.

<sup>8</sup>Content that looks like unbiased editorial/earned media but is actually paid advertising.

## ANNEX I



### EXAMPLES OF REAL LIFE SCENARIOS

In this Annex, you will find a list of common situations you may experience in your day-to-day work.

#### ENVIRONMENTAL, SOCIAL & GOVERNANCE RESPONSIBILITY

Potential scenario A: I am preparing a new capsule collection. For this collection, I would like to use materials that I know our customers will love, even though they have a higher impact on the environment than what we normally use. What should I do?

At BRUNA, our Environmental, Social, and Governance commitments should be fully integrated into business decision-making. Upholding our responsibility ambitions is not only the right thing to do, but it makes business sense, as it is in line with our customers' expectations of

BRUNA. If in doubt, however, please reach out to the ESG Department. They may be able to find alternative solutions that are just as beautiful. Please also reach out to the Operations department to confirm feasibility and pricing.

Potential scenario B: I just learned about a philanthropic program that I believe is in line with what BRUNA stands for. How can I support this program?

At BRUNA, we are happy to donate or provide non-monetary contributions to organizations that are aligned to our commitments. However, certain considerations should be made before we do so. This includes but is not limited to ensuring that the program has all necessary legal paperwork to confirm they are a non-profit; and checking that the program is in line with BRUNA's responsibility strategy. If you would like to support a philanthropic program, before making any

commitment to the program on behalf of BRUNA, please reach out to the ESG Department.

Potential scenario C: I have ambitious financial objectives to achieve at the end of the year, and I am afraid that BRUNA's responsibility commitments hinder those objectives. I would like to support them, but I need to be practical. What can I do?

BRUNA's environmental, social, and governance commitments are meant to be integral to our decision-making process, performance review, and broader business objectives. If you believe that these are in contrast with the objectives of your team, please reach out to your team lead. These will be reviewed and aligned, to the extent possible, with the purpose of striking a reasonable balance between economic considerations and responsibility ambitions.

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## HUMAN RIGHTS

Potential scenario A: I would like to hire a new team member. They work in a developing country, so I assume that I can pay them lower than other members of the team who live in more expensive cities. Is this correct?

While remuneration may vary to account for different living conditions around the world, at BRUNA, we believe in providing dignified living conditions that meet, at a minimum, the living wage. Before negotiating any contractual condition with the prospective hire, do not make any assumptions, rather, research the local living wage including at a minimum the costs of food, housing, education, healthcare, transportation, clothing and other essential needs for a family including unexpected events. There are online resources you can use to make this determination. If in doubt, reach out to the ESG Department for support.

Potential scenario B: I would like to work with an influencer, but they are 17. Is it allowed?

It is allowed to work with a person below the age of 18, provided that they are above 15, the age for completing compulsory education, or the legal minimum age for employment in the country, whichever age is greatest. However, working with a child remains a delicate topic, especially in the age of TikTok, Instagram, and social media more broadly. Before making any contractual arrangement, speak to your team lead, to ensure all necessary precautions are taken to provide this person with a dignified work opportunity that is fully respectful of their rights as a child.

Potential scenario C: I have participated in hiring interviews. A potential hire that I liked has not been selected by my colleague. I really thought this person met all of our qualification requirements! Based on the comments my colleague made, I believe this may be due to the candidate's nationality and ethnic origin. What should I do?

Any discrimination based on skin colour, nationality or ethnic origin is unacceptable to BRUNA. As a first step, try having a conversation with your colleague. It may be that your colleague discarded this candidate because of criteria such as education, professional background, or other relevant criteria. If you still have concerns of potential discriminatory practices, raise the matter with your team lead or the ESG Manager, either informally or through our grievance mechanism. They will investigate this instance and undertake any corrective action necessary.

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## FAIR & EQUAL TREATMENT

Potential scenario A: I heard a colleague make jokes while talking about another colleague on the basis of their sexual orientation. I believe this is disrespectful and would like to take action, but I don't know what to do.



At BRUNA, homophobia is completely unacceptable. As a first step, try having an open conversation with your colleague, to help them understand the nature of their joke and how it conflicts with BRUNA's values and standards of conduct. If the behavior does not stop immediately, or you need support in having this conversation, please reach out to Human Resources. Your concern will be taken seriously, and your anonymity respected as appropriate.

Potential scenario B: A new member of my team has asked me for permission to take breaks or adjust working hours during certain periods of the year, in order to pray and align with fasting requirements. Is this acceptable, or would I be providing this team member with unfair advantages?

Supporting a team member in practicing their religious belief is totally acceptable. To the extent that it is practically feasible, try accommodating these needs, for example by adjusting team meeting time slots, as appropriate. Other team members should understand that this is not special treatment, rather, an opportunity to foster diversity and inclusivity.

Potential scenario C: My partner and I are talking about growing our family. However, I am afraid that motherhood will hinder my career progression. What can I do?

As a women-led business, BRUNA is committed to supporting parents during pregnancy, parental leave, and when returning to work (see also Human Resources Policy for BRUNA's commitments on pregnancy, breastfeeding, and parental leave). This includes supporting the reintegration of team members at the end of their parental leave, in their former position or at an equivalent position in terms of status and salary, to the extent possible. In a small team like BRUNA, flexibility may be required on both sides to find practical and sensible solutions. Please reach out to Human Resources to start a conversation as early as possible, so that we can together find a solution that best fits yours and the company's needs.

## HEALTH, SAFETY & WELLBEING

Potential scenario A: Since I started working from home, I feel isolated and disconnected. This is aggravating my anxiety and depression, something I have always struggled with. I am afraid my personal issues will impact my work. What should I do?

Being deprived of social contact through work can lead to feeling isolated or disconnected, bringing on pressure and stress or aggravating pre-existing mental health problems. At BRUNA, it is our priority to ensure that all team members work in a safe and healthy environment. Without day-to-day contact, however, it is harder for us at BRUNA to recognize symptoms of stress or mental health problems. For this reason, it is important that you share how you feel with your team lead or Human Resources. We will provide you with the support needed, including helping adjust the workload as appropriate.

Potential scenario B: For the past few months, I have been working long hours and this is impacting my family life. I would like to have more work-life balance, but I am afraid that my manager will think I am not committed to the work.

When we are passionate about what we do, it is easy to end up working long hours. Although working overtime or during weekends may happen on occasion, especially during busy seasons or emergencies, it should not be the norm. If you feel like your workload is not sustainable or compatible with your private life, please speak up with your team lead or Human Resources. They will help to check that your workload is compatible with a regular work week, and that the performance objectives you have been assigned are compatible with such workload. Should that not be the case, they will help determine the best course of action.

Potential scenario C: Working on my laptop every day is having a negative impact on my health. At the end of the work day, my eyes hurt, and I have a headache. How can BRUNA support me?

At BRUNA, we put the health and safety of our team first. This includes protecting the team from health and safety risks arising from working on a computer or laptop (display screen equipment). Please reach out to your team lead or Human Resources to learn more about the support we can provide to ensure your home office is safe.

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## **RESPONSIBLE BUSINESS PARTNERSHIPS & BUSINESS INTEGRITY**

Potential scenario A: My husband owns a catering service. I believe his service is the best in town, and would be perfect for the next BRUNA event. Can I hire him for the job?

If this catering service really is the best in town, it may well be acceptable for BRUNA to establish a business partnership with family or friends of a BRUNA team member. However, the decision should not lay on you alone. Disclose the potential conflict of interest to your team lead, and collect pricing and service information from other potential candidates, so that the company can make an informed decision.

Potential scenario B: An influencer I like may be willing to communicate about BRUNA, if I give them the most expensive piece of jewelry we have. Can I send them the piece?

Gifting of BRUNA jewelry is acceptable, but should be aligned with our general gifting categories and PR strategy. If you would like to donate a jewelry piece, please communicate so to our Influencer Marketing team lead (for paid gifting requests and barter deals requests) or PR Manager (for unpaid product giftings, seedings to Key Opinion Leaders, and Celebrities). They will approve and properly record any gift made in our database, as appropriate.

Potential scenario C: I met my supplier at a trade show. They were very excited about a new collection they are

producing for our main competitor, and started sharing information about the collection and its pricing. Surely this is important information to share internally?

At BRUNA, we do not share or exchange price or other confidential information with or about competitors. This includes information about pricing, discounts, promotions, etc. If a supplier volunteers such information, you should bring the conversation to a close sensitively but immediately, and alert your team lead.

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## **RESPONSIBLE SUPPLY CHAINS**

Potential scenario A: I read in an NGO report that one of our suppliers has been accused of child labor. When I visited the supplier, they were extremely nice to me, and I built a very nice relationship with them. I also think they are the best partner for us in terms of price, quality, and delivery time, so I would like to continue working with them. What should I do?

As a general principle, at BRUNA, we believe in the power of engagement as opposed to disengagement. This means that, to the extent possible, we prefer using our influence over the supply chain to help improve supplier performance. For this reason, should you learn that a supplier may be associated with child labor, you should immediately alert your team lead and the ESG Manager, so that the situation can be further assessed, and a mitigation action developed in order to address any potential instance of child labor. However, in line with international best practice standards, please note that we are expected to immediately suspend trading with a supplier should the supplier be involved in any of the worst forms of child labor<sup>9</sup>.

Potential scenario B: I am looking for potential flowers and other suppliers for our new event. I have found a minority-owned business that I would like to support. Can I choose them without further investigations?



At BRUNA, we welcome opportunities to use our purchasing power as a force for good, including opportunities to create economic benefits for minority groups. However, it is still good practice to collect prices and service information from other potential suppliers, so that the supplier selection process is transparent. The potential decision to support this business, even if their prices may be higher, or quality lower, is ultimately a business decision. Make sure you provide management with all the information they need to approve your choice.

Potential scenario C: I am negotiating the price of packaging material with a supplier. I found a supplier that is cheaper, but I would like to use another because their quality and design is better. Can I tell the second supplier the prices of the first one?

You may tell your preferred supplier the prices you have found on the market to support your negotiating activities. However, you cannot communicate the name of the supplier that gave you the quote. If you did, you would be giving out confidential information about a competitor, which is unethical, and, in many countries, against the law.

## PRODUCT DISCLOSURE

Potential scenario A: I am preparing a marketing campaign for a new diamond collection. The diamonds are laboratory-grown, but this does not sound good in the ad, and it is too long. Diamonds are just diamonds, right?

It is of paramount importance that customers are not misled in their purchasing decisions. Laboratory-grown diamonds may be as beautiful and sparkly as natural diamonds, but our consumers may have a personal preference, or attach to them a different value. When preparing your marketing campaign, think about whether your advertisement may be in any way misleading or misinterpreted by the consumer, and ensure that they have access to any further product information before making a purchase.

Potential scenario B: I am preparing content for our new collection campaign. My colleague asked me to photoshop our collection, so it looks better than it is. I want to make my colleague happy, but I am afraid that I am lying to our customers. What should I do?



Retouching an image may be necessary at times, to improve lighting or other technical considerations. However, images should not be misleading as to the performance of the product being advertised. If you believe that the photos you are retouching are no longer representative of our products, you are right to raise questions. Have an open conversation with your colleague, and try to come to a compromise. If you need further guidance or support, talk to your team lead. Don't be afraid to start a conversation!

Potential scenario C: I would like to communicate that our products have a good impact on the environment, because I know this will help me reach my sales goals. I see other brands make similar communications, so it should be fine, right?

While business performance is important to sustain our long-term success, this should not be at the expense of our ethical standards. If you are unsure of the environmental or social performance of a product you are trying to sell, ask for guidance to the ESG Manager, he or she should be able to help. Consumers are tired of greenwashing. It is likely that starting an open conversation with your customers about the environmental impacts of the products, what we have done and what we can continue to improve, will help you build trust, and get you further in your business objectives anyways!

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## MARKETING & ADVERTISING

Potential scenario A: My colleague has created content for our new jewelry line, which includes women from around the world. However, I think these women are depicted in ways that reinforce gender stereotypes, and this makes me feel uncomfortable. What should I do?

At BRUNA, we promote a culture of open communication. If you are uncomfortable with how your colleague

has approached this campaign, feel free to initiate a conversation with the team. If you need support in having this conversation, please reach out to the ESG Manager.

Potential scenario B: I am currently working on a campaign that will be, I believe, very exciting. It is provocative, and in my country, this will be appreciated by our younger customers. However, I have a feeling that customers from other cultures may find it offensive. What should I do?

At BRUNA, we do not use images, symbols or themes that could be considered gratuitously offensive, demeaning or disrespectful of a religion, nationality, culture, minority group or disability. If you are unsure whether your campaign will be acceptable, try to obtain an objective opinion. For example, ask your colleagues, or organize a focused group to gain a different perspective.

Potential scenario C: I am currently working on a campaign for a new product launch. My colleague is suggesting that we focus the campaign on the environmental benefits of this collection. However, I am also aware of some environmental impacts of the materials we use, and I am afraid that using the angle suggested by my colleague may be greenwashing.

At BRUNA, we do not engage in any form of greenwashing or impact washing. Your campaign can and should include information on the environmental benefits of the new collection, if these are true, however, such information should be balanced and proportionate. In no instance should it mislead our customers or be formulated as to hide any negative or residual impact of our collection.

<sup>9</sup>The worst forms of child labor are defined in the ILO Convention No. 182 and include: Slavery and similar issues such as the trafficking of children, debt bondage, serfdom, children in armed conflict; The sexual exploitation of children (prostitution, pornography and pornographic performances); The involvement of children in illicit activities, for example, the production and trafficking of drugs; Work which is likely to harm the health, safety or morals of children.