

A black and white close-up portrait of a woman's face and neck. She is looking upwards and to the right. She is wearing a pearl necklace with several large, irregular pearls and a pair of pearl earrings. The lighting is soft, highlighting her features and the texture of the pearls.

BRUNA

2022

BRUNA'S CODE OF CONDUCT

FOR BUSINESS PARTNERS
& MATERIALS STANDARD

[BRUNATHELABEL.COM](https://www.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.

Kindness to the environment and to the people who contribute to our value chain is equally important. It is by protecting, conserving, and restoring natural resources that we can create beautiful jewelry pieces for future generations to cherish, uncompromised. And it is by respecting and promoting the rights of workers and communities that we produce jewels that are not only beautiful, but also a source of dignified living and value creation for workers and communities around the world.

As our trusted business partner, you play a critical role in our commitment to environmental, social, and governance responsibility. We cannot uphold our commitments alone. It is by working together with mutual respect, understanding, and support that we can achieve shared objectives, including 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 our business partner over the course of our collaboration. 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 achieve BRUNA's vision of creating jewelry with 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

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

We cannot achieve this vision alone. Each of our business partners has a role to play to contribute to this vision. Through transparent, meaningful, and respectful collaboration, we can demonstrate that creating beautiful jewelry pieces with a positive impact is not an utopy, rather, it is a possible reality.

ABOUT THIS CODE

WHO DOES THIS CODE APPLY TO?

This Code of Conduct applies to all of BRUNA's business partners. A business partner is any individual, organization, or business entity with whom we have a business relationship, including, but not limited to, suppliers and contractors.

WHAT IS THE PURPOSE OF THIS CODE?

BRUNA expects all business partners to uphold BRUNA's vision and commitments, and to abide by ethical standards of business conduct.

This Code of Conduct articulates BRUNA's vision, mission, and expectations for our business partners. BRUNA only works with business partners which agree to comply with the requirements of this Code. By translating our commitments into practical dos and don'ts, the ultimate goal of this Code is to ensure that all commitments are upheld and implemented across all value chains.

WHAT SHOULD I DO IF IN DOUBT?

If you have any questions with regards to this Code and its practical implications, please reach out to the Environmental, Social and Governance (ESG) Department at BRUNA, at esg@brunathelabel.com.

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

We encourage all business partners to ask questions and raise issues without fear of retaliation. Should you become aware of any actual or potential Code violation, please raise your concern to the ESG Department at BRUNA, at esg@brunathelabel.com

A business partner's relationship with BRUNA will not be affected by a report of potential Code violation made in good faith.¹

MONITORING & IMPLEMENTATION OF THE CODE

We expect our business partners to ensure that adequate and effective management systems, policies, procedures, and training are in place to ensure ongoing compliance.

For the purpose of this Code, we use the terms 'must' and 'expect' interchangeably. This means that, where we use the term 'must' or 'expect', we are outlining a requirement for BRUNA's business partners and a failure to meet that requirement will constitute a breach of contract.

Instead, where we use the term 'should', this means that we encourage our business partners to adopt a certain practice, in line with best practice standards.

BRUNA reserves the right to monitor and verify compliance with the standards set forth in this Code including but not limited through the request of information and documentary evidence and through audits. When this happens, we expect full cooperation from all business partners in providing access to relevant information, documentation, premises, and personnel.

We expect our business partners to make reasonable efforts to meet the expectations of this Code. In the event of non-conformity, we expect the business partner is able to provide us with a reasonable explanation as to why they are unable to comply. In the event of non-conformity, our first response will be to support our business partner in the development and implementation of a corrective action plan.

However, BRUNA reserves the right to suspend the business relationship if:

- The business partner fails to make reasonable efforts to meet our expectations and is unable to provide a reasonable explanation;
- The business partner refuses to cooperate;
- After failed attempts at mitigation within agreed timelines;
- Any of the most serious instances of human rights violation are identified. These include forced labor, the worst forms of child labor, or conflict financing.

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.

MISSION

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

VISION

Jewelry with a positive impact on our ecosystems.

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.

BRUNA'S COMMITMENTS



POLICIES & REFERENCE STANDARDS

Bruna's commitment 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 Rights²
- the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work³
- 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 Rights Policy;
- our Responsible Supply Chains Policy.

Please access the latest version on our website.

UPHOLDING BRUNA'S COMMITMENTS

LEGAL COMPLIANCE

We commit to:

In the conduct of our activities, we are committed to complying with all applicable laws, regulations, and conventions, as well as with industry best practices. We expect our business partners to apply the same respect for all applicable laws, regulations, conventions, industry standards in the management of their own operations.

Please access the latest version of Responsible Supply Chains Policy [here](#).

BRUNA'S BUSINESS PARTNERS MUST:

- Comply with all applicable laws and regulations, including but not limited to laws concerning environmental protection, human rights, labor rights, workplace health and safety, and business integrity.
- Maintain any necessary permits and licenses

BRUNA'S BUSINESS PARTNERS MUST NOT:

- Knowingly undertake any action that represents a breach of any applicable law or regulation.

ENVIRONMENTAL, SOCIAL & GOVERNANCE RESPONSIBILITY

We commit to:

Beyond legal compliance, we are committed to 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 and safety, and business integrity.

See Responsible Supply Chains Policy.

BRUNA'S BUSINESS PARTNERS MUST:

Comply with the requirements in this Code, including specific requirements associated with the sourcing, manufacturing, and processing of materials supplied to BRUNA. Please refer to the Materials Standard in Annex I to this Code.

BRUNA'S BUSINESS PARTNERS MUST NOT:

Knowingly undertake any action that represents a breach of this Code, or that purposefully prevents BRUNA from achieving its environmental, social, or governance commitments.

BRUNA'S BUSINESS PARTNERS SHOULD:

- Identify opportunities to improve their environmental, social, and governance practices, beyond legal compliance, in line with international treaties and best practices in their industries.
- Identify and address the impacts of their business on the environment by applying the mitigation hierarchy (avoid, minimize, restore/mitigate, offset).
- Develop decarbonisation roadmaps for the reduction of their carbon footprint, in line with the goals of the Paris Agreement.
- Identify and address the impacts of their business on local communities; take action to avoid or mitigate any negative impacts; and promote opportunities for sustainable development.

HUMAN RIGHTS

We commit to respect internationally recognized human rights standards⁴, including in our supply chains.

See Human Rights Policy and Responsible Supply Chains Policy.

BRUNA'S BUSINESS PARTNERS MUST:

- Respect the internationally recognized human rights⁵ of their workforce. This includes, as articulated in the next sections of this Code: respecting the workers right to freedom of association and collective bargaining, ensuring voluntary employment, avoiding any form of child labor, offering fair terms and conditions of employment including fair remuneration, working hours and working conditions; avoiding any form of discrimination.
- Ensure that their workforce has a clear understanding of their rights, including through the provision of transparent terms and conditions of employment in a language that the workers understand.
- Where applicable (i.e. for business partners engaged in mining activities), support, implement and promote the Voluntary Principles on Security and Human Rights. This includes training their security workers on the Voluntary Principles and being clear about their expectations when engaging with public security.

BRUNA'S BUSINESS PARTNERS MUST NOT:

- Undertake any action which infringes upon the internationally recognized human rights of their workforce.

BRUNA'S BUSINESS PARTNERS SHOULD:

- Adopt a due diligence framework, in line with the recommendations of the OECD Due Diligence Guidance for Responsible Business Conduct, to identify, assess, and where appropriate manage, human rights risks or impacts that they may cause or contribute to, or which may be linked to their operations, products or services through their business relationships.
- Identify opportunities to promote human rights in their operations and along their supply chains.

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.

We expect our business partners to uphold the same commitment. Should we find a reasonable risk that our business partners are associated with any form of forced labor, we will immediately suspend or discontinue trading with such business partners.

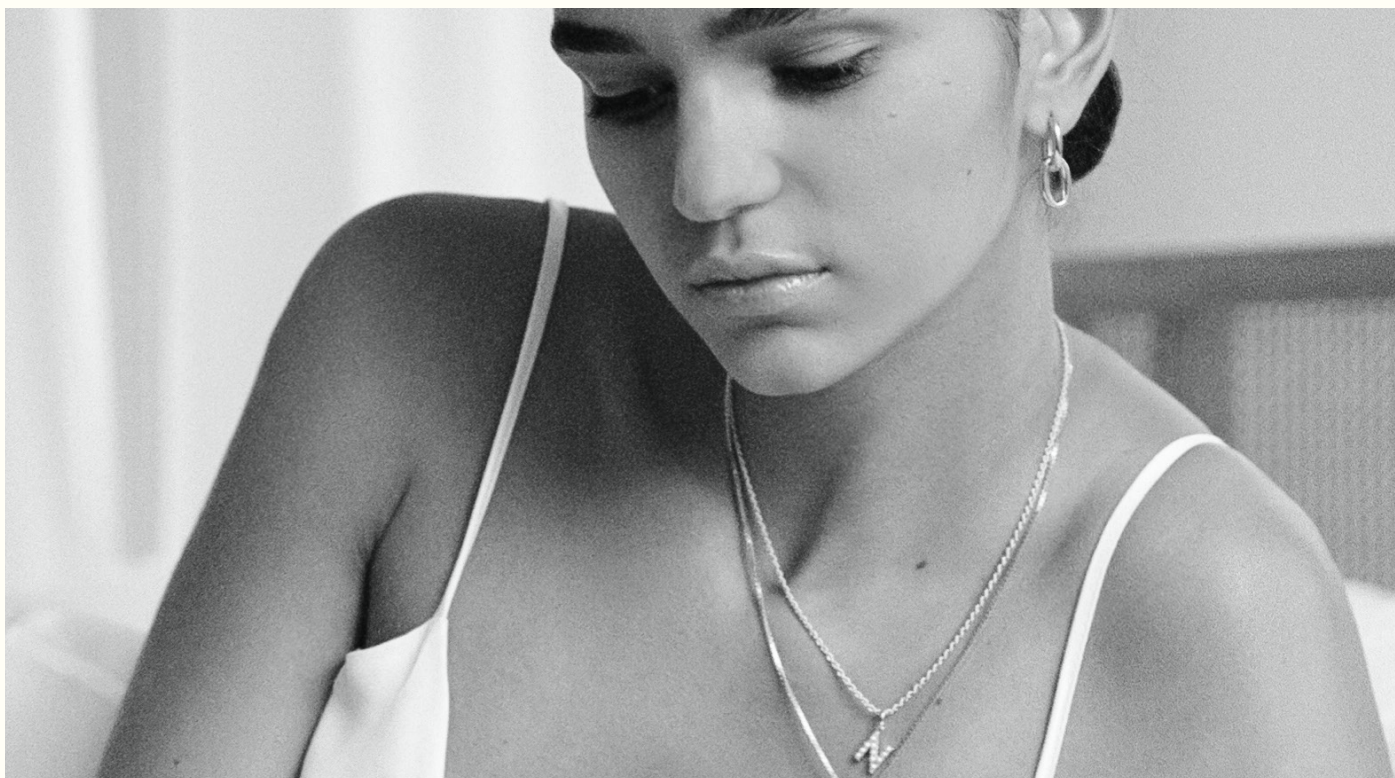
See Human Rights Policy.

BRUNA'S BUSINESS PARTNERS MUST:

- Ensure employment is freely chosen.
- Ensure workers are free to leave their employer after reasonable notice.
- Have zero tolerance for any form of forced or compulsory labor in their operations and supply chains.
- Actively work to eliminate forced labor from their supply chains, including by incorporating the requirements in this section into all contracts with subcontractors and suppliers involved in the provision of materials, products or services to BRUNA.
- Monitor relationships with recruitment agencies or contracted labor for risk of forced labor and compliance with applicable anti-slavery laws.

BRUNA'S BUSINESS PARTNERS MUST NOT:

- Engage in any form of forced or compulsory labor.
- Use any practice to coerce the continued employment of any person, for example, require workers to lodge "deposits" or their identity or travel papers with their employer, require employees to pay recruitment commissions or withholding any personal or travel documents.



FREEDOM OF ASSOCIATION & COLLECTIVE BARGAINING

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

We expect our business partners to uphold the same commitment.

See Human Rights Policy.

BRUNA'S BUSINESS PARTNERS MUST:

- Respect workers' right to join or form trade unions of their own choosing and to bargain collectively.
- Adopt an open attitude towards the activities of trade unions and their organizational activities.
- Where the right to freedom of association and collective bargaining is restricted under law, facilitate, and do not hinder, the development of parallel means for independent and free association and bargaining.

BRUNA'S BUSINESS PARTNERS MUST NOT:

- Undertake any form of discrimination against workers' representative or unionized workers.

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 labor⁸ nor any form of child labor⁹. We expect our business partners to uphold the same commitment.

Should we find a reasonable risk that our business partners are associated with any of the worst forms of child labor, we will immediately suspend or discontinue trading with such business partners.

Should any instance of child labor be identified in connection with our business relationships, we will develop, participate in, or contribute to, as appropriate, policies and programmes which provide for the transition of any child found to be performing child labor to enable them to attend and remain in quality education until the age of 15, the age for completing compulsory education, or the legal minimum age for employment in the country, whichever age is greatest.

See Human Rights Policy.

BRUNA'S BUSINESS PARTNERS MUST:

- Have zero tolerance for any of the worst forms of child labor in their operations and supply chains.
- Prevent any form of child labor.
- Work to eliminate child labour and the worst forms of child labor from their supply chains, including by incorporating the requirements in this section into all contracts with subcontractors and suppliers involved in the provision of materials, products or services to BRUNA.
- Where instances of child labor are identified in their operations or supply chains, develop, participate in, or contribute to, as appropriate, policies and programmes which provide for the transition of any child found to be performing child labor to enable them to attend and remain in quality education until the age of 15, the age for completing compulsory education, or the legal minimum age for employment in the country, whichever age is greatest.

BRUNA'S BUSINESS PARTNERS MUST NOT:

- Provide employment to anyone under the age of 15, the age for completing compulsory education, the legal minimum age for employment in the country, whichever standard is greatest.
- Employ children and young persons under 18 at night or in hazardous conditions.

BRUNA'S BUSINESS PARTNERS SHOULD:

- Take steps to identify, assess, and where appropriate, address any risk of child labor in their own supply chains.

WAGES & BENEFITS

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

We expect our business partners to provide wages and benefits that meet local legal standards, including at a minimum the minimum wage, and we support efforts for the provision of a living wage across all supply chains.

See Human Rights Policy.

BRUNA'S BUSINESS PARTNERS MUST:

- At a minimum, comply with applicable law in the payment of wages and overtime pay and the provision of benefits, including holidays, leaves and statutory severance.
- Provide wages and benefits paid for a standard working week that meet, at a minimum, national legal standards.
- Provide all employees with written and understandable information about their employment conditions in respect to wages before they enter employment.
- Provide all employees with written wage statements and about the particulars of their wages for the pay period concerned each time that they are paid.
- Compensate for overtime hours at the rate legally required by local law or, where such laws do not exist, in accordance with ILO conventions¹⁰.

BRUNA'S BUSINESS PARTNERS MUST NOT:

- Make any deductions from wages as a disciplinary measure.
- Make any deductions from wages not provided for by national law and without the expressed permission of the worker concerned.

BRUNA'S BUSINESS PARTNERS SHOULD:

Provide all workers a living wage.

WORKING HOURS

We commit to working hours and paid leave that meet, at a minimum, national legal standards, collective agreements, and the provisions of the relevant ILO conventions¹¹, whichever affords the greater protection for workers.

We expect our business partners to uphold the same commitment.

See Human Rights Policy.

BRUNA'S BUSINESS PARTNERS MUST:

- At a minimum, ensure that working hours comply with applicable law or collective agreements, whichever affords the greater protection for workers.
- Working hours, excluding overtime, must be defined by contract, and not exceed 48 hours per week¹².
- The total hours worked in any seven day period must not exceed 60 hours, except in exceptional circumstances where all of the following conditions are met:
 - this is allowed by national law;
 - this is allowed by a collective agreement freely negotiated with a workers' organization representing a significant portion of the workforce;
 - appropriate safeguards are taken to protect the workers' health and safety;

- the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.
- Workers must be provided with at least one day off in every seven day period or, where allowed by national law, two days off in every 14 day period.
- Provide paid leave that meets, at a minimum, applicable law.
- Provide all employees with written and understandable information about their employment conditions in respect to working hours before they enter employment.
- Ensure all overtime is voluntary and used responsibly and compensated at a premium rate (see section Wages and Benefits).
- Keep accurate and transparent records of working hours at all times.

BRUNA'S BUSINESS PARTNERS MUST NOT:

- Undertake any action that is unlawful or infringes upon their employees' rights to reasonable working hours and voluntary overtime.

BRUNA'S BUSINESS PARTNERS SHOULD:

- Advance opportunities to promote employees' wellbeing, including through work-life balance.



FAIR & EQUAL TREATMENT

We commit to equality of opportunity and treatment in respect of employment and occupation. 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.

We commit to providing a workplace that is free from harassment, including but not limited to sexual harassment¹³, and bullying¹⁴. We expect our business partners to uphold these same commitments.

See Human Rights Policy.

BRUNA'S BUSINESS PARTNERS MUST:

- Guarantee equal remuneration for men and women workers for work of equal value.
- Prohibit any form of discrimination.
- Prohibit any form of harassment, including sexual harassment.

BRUNA'S BUSINESS PARTNERS MUST NOT:

- Undertake 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.
- Undertake or allow any form of corporal punishment or discipline, threats of violence or other forms of mental or physical coercion.

BRUNA'S BUSINESS PARTNERS SHOULD:

- Advance opportunities to promote equity, diversity and inclusion in their workplace and supply chains.

HEALTH & SAFETY

We are committed to health and safety in the workplace and we expect our business partners to uphold the same commitment.

See Human Rights Policy.

BRUNA'S BUSINESS PARTNERS MUST:

- Fully comply with all applicable safety laws, regulations and industry standards.
- Provide a safe and hygienic working environment.
- Take adequate steps to assess health and safety hazards and risks, and prevent hazards and risks by adopting the hierarchy of controls¹⁵.
- Where personal protective equipment (PPE) is necessary, provide PPE free of charge and in good condition.
- Provide regular and recorded health and safety training.
- Provide access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage.
- Use and transport hazardous materials, including chemicals and hazardous waste, safely and responsibly.
- Keep an inventory of all hazardous substances used and maintain updated Material Safety Data Sheets (MSDS).
- Ensure products meet all applicable product safety specifications.
- Ensure the safety and security of all workers and visitors.

BRUNA'S BUSINESS PARTNERS MUST NOT:

- Undertake any action that is unlawful or infringes upon their employees' rights to a healthy and safe work environment.
- Manufacture, trade, or use chemicals and hazardous substances subject to international bans.

BRUNA'S BUSINESS PARTNERS SHOULD:

- Advance opportunities to promote workers' wellbeing, both mental and physical.

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.

BRUNA'S BUSINESS PARTNERS MUST:

- Conduct business ethically.
- Ensure compliance with applicable anti-corruption and bribery laws.
- Ensure all business dealings are reflected on their business books and records.
- Have zero tolerance for corruption or bribery of any kind, whether to a public official or a private individual, including facilitation payments.
- Avoid conflict of interests with their obligations to BRUNA and take steps to declare and manage any conflicts, including in respect of their workers.
- Provide their stakeholders, including their workforce and communities, access to grievance mechanisms for the confidential raising of concerns without fear of retaliation.
- Treat all data, information and documents provided by BRUNA as strictly confidential.
- Keep all necessary information and documentation regarding the origin and composition of the products supplied to BRUNA.
- Properly disclose the nature and quality of materials supplied to BRUNA according to industry guidelines and national or international laws including, but not limited to, the nature of the material (e.g. natural or laboratory-grown), any treatments or enhancements, and information related to the quality of the material (e.g. assays, quality marks or hallmarks).

BRUNA'S BUSINESS PARTNERS MUST NOT:

- Offer, provide or authorize bribes of any kind, including facilitation payments, either directly or indirectly, to a public official or a private individual.
- Request or accept bribes of any kind, either directly or indirectly.
- Engage in any form of corrupt practices, including, extortion, embezzlement, fraud, money laundering.
- Violate or cause BRUNA to violate any applicable anti-corruption or bribery laws.
- Provide any type of support, including funding, to terrorist or armed groups.
- Engage in subcontracting without the prior written authorization of BRUNA.

BRUNA'S BUSINESS PARTNERS SHOULD:

- Consider publicly disclosing their beneficial owners.
- Undertake Know Your Counterparty (KYC) checks on their own supply chain.

RESPONSIBLE BUSINESS PRACTICES IN MINERAL & METALS SUPPLY CHAINS¹⁶

With respect to minerals and metals supply chains, we commit to:

- Neither tolerate nor profit from, contribute to, assist or facilitate the commission of serious abuses associated with the extraction, transport or trade of minerals.
- Not tolerate direct or indirect support to non-state armed groups.
- Not provide direct or indirect support to public or private security forces that commit abuses or that act illegally as described in our Responsible Supply Chains Policy.
- Offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of minerals, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of minerals (see section Responsible Business Partnerships and business integrity).
- Support and contribute to efforts to eliminate money laundering (see section Responsible Business Partnerships and business integrity).
- Support and contribute to efforts to ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas are paid to governments (see section Responsible Business Partnerships and business integrity).

See Responsible Supply Chains Policy.

BRUNA'S SUPPLIERS OF MINERALS & METALS MUST:

- Adopt a due diligence framework, in line with the recommendations of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas to identify, assess, and manage risks of significant adverse impacts which may be associated with the extraction, trading, handling, and exporting of minerals from conflict affected and high risk areas.
- Comply with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions in respect to conflict financing.
- Have zero tolerance for any form of serious abuses as defined in our Responsible Supply Chains Policy¹⁷ and for any form of direct or indirect support to non-state armed groups.
- Immediately suspend or discontinue engagement with their suppliers where they identify a reasonable risk that they are committing, are sourcing from or are linked to any party committing serious abuses or conflict financing.
- Immediately devise, adopt and implement a risk management plan to prevent or mitigate the risk of:
 - direct or indirect support to public or private security forces engaged in the abuses identified in our Responsible Supply Chain Policy,
 - bribery or fraudulent misrepresentation of the origin of minerals,
 - Money laundering.
- Suspend or discontinue engagement with their suppliers after failed attempts at mitigation within six months from the adoption of the risk management plan.
- Pay all taxes, fees, and royalties related to mineral extraction, trade and export.
- If applicable (i.e. if the business partner is a mining business operating in an EITI-implementing country), disclosed all taxes, fees, and royalties related to mineral extraction, trade and export in accordance with the principles set forth under the Extractive Industry Transparency Initiative (EITI).

BRUNA'S BUSINESS PARTNERS MUST NOT:

- Engage in any action which causes or contributes to serious abuses.
- Engage in any action which causes or contributes to conflict financing.
- Provide direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders.
- Our suppliers of metals and minerals must not offer, promise, give or demand bribes, and resist the solicitation of bribes, to conceal or disguise the origin of minerals, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of minerals.
- Engage in any action associated with money laundering.

BRUNA'S BUSINESS PARTNERS SHOULD:

- Consider undertaking or promoting third-party audits of their supply chain due diligence system and practices at key points of transformation (e.g. smelting/refining) along the supply chain.

¹“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.

²The “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 Cov.

³With 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).

⁴Internationally 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.

⁵See previous footnote.

⁶See previous footnote.

⁷As 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.”

⁸As 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.

⁹Work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.

¹⁰Overtime is recommended to be paid not less than 125% of the regular rate of pay.

¹¹ILO Hours of Work (Industry) Convention, 1919 (No.1); ILO Weekly Rest (Industry) Convention, 1921 (No. 14); ILO Holidays with Pay Convention, 1970 (No. 132).

¹²International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers’ wages as hours are reduced.

¹³Sexual 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.

¹⁴Workplace 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.

¹⁵The hierarchy of controls is a way of determining which actions will best control exposure to health and safety risks or impacts. The hierarchy of controls has five levels of actions to reduce or remove hazards. The preferred order of action based on general effectiveness is: 1. Elimination; 2. Substitution; 3. Engineering controls; 4. Administrative controls; 5. Personal protective equipment (PPE).

¹⁶The following requirements apply to suppliers of gold, silver, other metals, gemstones, and diamonds.

¹⁷As per OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from ConflictAffected and High-Risk Areas.

ANNEX: BRUNA'S STANDARDS FOR THE RESPONSIBLE SOURCING OF CONSCIOUS MATERIALS



INTRODUCTION

As per our Environmental, Social, and Governance (ESG) Policy, BRUNA is committed to choosing conscious materials for the creation of our beautiful, timeless jewelry pieces and packaging. To this end, and to the extent that it is technically and economically viable, we adopt traceable, low-impact materials, with a preference for recycled materials. We source our materials responsibly from business partners that adhere to our social and environmental standards.

BRUNA's Standards for the Responsible Sourcing of Conscious Materials outlines BRUNA's expectations for business partners with respect to the sourcing and manufacturing of materials, including raw materials and semi-finished products supplied to BRUNA. It constitutes an integral part of our Code of Conduct for Business Partners.

It is acknowledged that the practical implementation of the standards outlined in this document may take time, or may lead to potential contractual considerations (e.g. re-pricing) with BRUNA. In this case, please reach out to the ESG Department at esg@brunathelabel.com. We will, together, design a roadmap that will help both you and BRUNA achieve our intended outcomes within reasonable timelines.

COTTON (& OTHER TEXTILE MATERIALS)

WHY IT MATTERS

Cotton production is today one of the main sources of environmental impacts, due to the substantial use of pesticides, fertilizers and water consumption required for cultivating cotton. It is also an unfortunate reality that cotton supply chains have been found to be linked to severe human rights violations, including forced labor and child labor.

In this context, sourcing cotton responsibly is fundamental for BRUNA to fulfill our environmental, social, and governance commitments. For this reason, when sourcing cotton for pouches, ribbons, or other products, we make efforts to avoid, reduce, or mitigate potential impacts on the natural environment, and to ensure that the internationally recognized rights of workers are respected along the entire value chain.

BRUNA'S SUPPLIERS OF COTTON (& OTHER TEXTILES, AS APPROPRIATE) MUST:

- Provide traceability or chain of custody up to the country of origin (i.e. country of cultivation or point of reclamation) for all cotton used in products supplied to BRUNA.
- Avoid sourcing from countries which are known for state-imposed forced labor.
- Meet at least one of the additional good practices listed below

ADDITIONAL GOOD PRACTICES

- Strive to use or increase the share of recycled fibers in our cotton products, and provide the appropriate certifications e.g. the Global Recycled Standard (GRS).
- If supplying virgin cotton, strive to use certified organic cotton, e.g. the Global Organic Textile Standard (GOTS) Certification or the Organic Content Standard (OCS) Certification; or other initiatives which promote responsible agricultural practices, such as the Regenerative Organic Certification (ROC).

- Contribute to the sustainable development of communities involved in cotton production, through sourcing from initiatives such as: the Better Cotton Initiative (BCI), Cotton made in Africa (CMiA); and Fairtrade.
 - Ensure that the textile material supplied to BRUNA has not been treated with harmful substances, as certified by the OEKO-TEX® STANDARD 100.
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MINERALS & METALS (PRECIOUS MINERALS, COLORED GEMSTONES, DIAMONDS)

WHY IT MATTERS

- It is an unfortunate reality that minerals and metals supply chains may be associated with issues such as conflict financing or human rights violations. This occurs, in particular, when sourcing from so-called Conflict-Affected and High-Risk Areas, as well as low-income countries where artisanal and small-scale mining (ASM) is prevalent.
- Conscious of the risks that exist in minerals and metals supply chains, as a general principle, BRUNA promotes the use of recycled sources for our jewelry pieces (i.e. recycled gold and silver), as well as the use of laboratory-grown diamonds.
- However, we are also conscious of the development opportunities that minerals and metals supply chains, including artisanal mining, represent for millions of workers around the world, when undertaken responsibly, especially in communities where alternative employment is hard to come by. We are also conscious that, in certain instances, we can most effectively promote internationally recognised human rights through our presence rather than our absence.
- For this reason, BRUNA remains open to the possibility of sourcing precious minerals, colored gemstones, and diamonds from artisanal communities, provided the material is certified against the highest applicable standards.

BRUNA'S SUPPLIERS OF MINERALS & METALS MUST:

For all minerals and metals:

- Have a due diligence system in place, in line with the 5-step framework outlined in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. This means having policies and processes in place to identify, assess, and, where necessary, manage human rights and conflict financing risks.
- Meet at least one of the additional good practices listed below (where applicable).
- For precious metals:
 - Supply BRUNA with recycled metals (unless otherwise agreed, in the context of specific initiatives e.g. in support of artisanal mining communities), and provide documentary evidence that such metals are, indeed, recycled.
 - Source recycled metals from smelting/refining facilities that meet the highest standards, i.e. are accredited by LBMA and appear in the Good Delivery List; and/or are assessed by the Responsible Minerals Initiative (RMI) and appear in the list of conformant smelters and refiners; and/or have achieved a Responsible Jewellery Council (RJC) Code of Practices Certification or equivalent.
- Provide traceability or chain of custody up to the country of origin (i.e. country of extraction or point of smelting/refining) for all precious metals used in products supplied to BRUNA.
- For colored gemstones:
 - Provide traceability or chain of custody up to the country of origin (i.e. country of extraction) for all colored gemstones used in products supplied to BRUNA.
- For laboratory-grown diamonds:
 - Provide evidence of responsible environmental and/or, specifically, energy management, such as an ISO14001 certification or equivalent.

ADDITIONAL GOOD PRACTICES:

- Obtain the Responsible Jewellery Council (RJC) Code of Practices (COP) Certification and Responsible Jewellery Council (RJC) Chain of Custody (COC) Certification.
 - Source minerals or metals from initiatives designed to support the sustainable development of artisanal and small-scale miners as a route out of poverty, for workers in developing countries, for example, from certified Fairtrade Gold or Fairmined mining operations.
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PAPER

WHY IT MATTERS

Paper supply chains can be associated with risks of deforestation and illegal logging, especially when sourcing from countries with a substandard regulatory environment. Deforestation can have a number of negative consequences for both people and the environment, including but not limited to: desertification, soil erosion, flooding, increased greenhouse gasses in the atmosphere, and biodiversity loss, as well as impacts on the livelihood of Indigenous Peoples.

For this reason, when sourcing paper for packaging or office supply, we make efforts to avoid, reduce, or mitigate potential impacts on forest ecosystems, the communities that depend on them, and society and the environment at large.

BRUNA'S SUPPLIERS OF PAPER MUST:

- Provide traceability or chain of custody up to the country of origin (forest or point of reclamation).
- Adhere to the principles and criteria of the Forest Stewardship Council (FSC) and obtain an FSC certification for paper-based products supplied to BRUNA.
- Make efforts to reduce the use of virgin raw material and increase the share of recycled content, aiming at providing BRUNA with 100% recycled paper.

ADDITIONAL GOOD PRACTICES

- Identify opportunities to use innovative materials such as grass or seed paper, to reduce the environmental impacts of paper production, and/or generate a positive impact on the environment.
 - Identify opportunities to promote forest conservation, restoration and regeneration through, including through carbon neutrality programs.
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PEARLS

WHY IT MATTERS

Pearls are formed by various saltwater and freshwater molluscs within a natural pearl sac with (cultured pearls) or without (natural pearls) human intervention. According to researchers, responsible pearl farming can have positive impacts on the environment. Put simply, a good quality pearl is produced by healthy oysters in healthy environments.

Still, as research grows, we remain vigilant of the potential impacts of pearl farming, and expect our suppliers to operate responsibly, in harmony with their local ecosystems, as well as in full compliance with local regulations and international human rights standards.

BRUNA'S SUPPLIERS OF PEARLS MUST:

Provide traceability or chain of custody up to the country of origin and, to the extent possible, the pearl farm, to ensure the farms operate responsibly, from both an environmental and social perspective. This includes providing information of how pearl farmers stimulate the pearl-formation process, and whether the pearls are treated with any bleach or chemicals.

ADDITIONAL GOOD PRACTICES

- Meet the [Marine Stewardship Council \(MSC\) Fisheries Standard](#).
- Meet the [Aquaculture Stewardship Council \(ASC\) standards](#).