



BRUNA

2022

HUMAN RIGHTS 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.*

As part of this vision, we recognise our corporate responsibility to respect human rights, in line with the “Protect, Respect and Remedy” framework of the United Nations, as articulated in the UN Guiding Principles on Business and Human Rights.

This responsibility includes avoiding infringing on people’s rights and addressing adverse human rights impacts that our business may cause or contribute to, or which may be linked to our operations, products or services through our business relationships.

Beyond that, we believe that we have a role to play in promoting human rights, that is, we have a role to play to make a positive contribution to promote or advance human rights, at BRUNA, in our community, and along our value chains.

This policy defines our human rights commitments, in line with the recommendations of the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Business Conduct.

It should be noted that human rights refer to a set of basic rights and freedoms with economic, social, cultural, political and civil dimensions. For this reason, while this policy defines our basic human rights commitments, it should not be read in isolation.

Human rights are embedded into BRUNA’s relevant policies and practices including, but not limited to, our Human Resources Policy and our Responsible Supply Chains Policy. Our expectations for the BRUNA team and our business partners are articulated in BRUNA’s Code of Conduct and BRUNA’s Code of Conduct for Business Partners.

SCOPE

This policy applies to all employees, managers, and directors at BRUNA, as well as contractors under BRUNA’s direct supervision. We expect our business partners to uphold our commitments in this policy, as defined in our Code of Conduct for Business Partners.

OUR COMMITMENTS

We commit to respecting internationally recognized human rights standards, throughout our operations and supply chains. Internationally recognized human rights include at a minimum those enshrined in the International Bill of Human Rights¹ and the principles concerning fundamental rights set out in the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work.²

At BRUNA, respecting human rights means ensuring that any person involved in, or coming into contact with, our operations, supply chains and products is treated with dignity, respect, fairness and equality.

This includes, at a minimum, the following 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.³

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.

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.

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 labor⁴ nor any form of child labor.⁵ 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.

WAGES AND 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.

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 conventions,⁶ whichever affords the greater protection for workers.

We expect our business partners to uphold the same commitment.

FAIR AND 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 harassment,⁷ and bullying.⁸

We expect our business partners to uphold these same commitments.

Beyond equality of opportunity, we see diversity as a value to be protected and encouraged with concrete actions. We commit to 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.

HEALTH, SAFETY AND WELLBEING

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

At BRUNA, our commitment includes providing the team with the necessary knowledge, tools, and support to promote health and safety in home offices. Beyond basic workplace health and safety, we are committed to fostering the wellbeing of the team, including both mental and physical.

GOVERNANCE

This policy is reviewed for effectiveness and relevance every year and when new circumstances arise by the Environmental, Social and Governance (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.

The policy is implemented through appropriate due diligence systems to identify, prevent, mitigate, and account for how we address adverse human rights impacts, in line with the recommendations of the OECD Due Diligence Guidance for Responsible Business Conduct and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas for mineral supply chains specifically.

Our business partners are expected to uphold our commitments and to carry out their own due diligence, in line with the recommendations of these standards.

We promote knowledge sharing and capacity building along the supply chain, and establish partnerships with business partners and peers to promote collective improvement.

In the spirit of transparency, this policy is published on our website, and regularly communicated both internally and to our business partners. The results of our due diligence practices will be communicated on our website on a yearly basis.

Should you become aware of any potential associations by BRUNA or our supply chains to any of the risks described in this policy, we encourage you to get in touch with our team, by submitting any concern or grievance at: esg@brunathelabel.com.

¹ 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.

² With the adoption in June 1998 of the ILO Declaration on Fundamental Principles and Rights at Work, 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).

³ As 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."

⁴ As 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.

⁵ Work that is mentally, physically, socially or morally dangerous and harmful to children; and/or interferes with their schooling by depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work.

⁶ ILO Hours of Work (Industry) Convention, 1919 (No.1); ILO Weekly Rest (Industry) Convention, 1921 (No. 14); ILO Holidays with Pay Convention, 1970 (No. 132).

⁷ 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.

⁸ 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.

Signature of the CEO



Date: 07 / 12 / 2022