



BRUNA

2022

**RESPONSIBLE SUPPLY
CHAINS POLICY**

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

When it comes to supply chain management practices, having a positive impact on our ecosystems means to identify, assess, and manage potential risks associated with our business partners, as well as to use our influence as a force for good, to improve practices and create business opportunities that contribute to accelerating our vision.

As a member of the jewelry industry, we recognise that risks of significant adverse impacts may be associated with extracting, trading, handling and exporting minerals and metals, in particular when sourcing from so-called Conflict-Affected and High-Risk Areas.

This policy defines our commitments to responsible supply chain management for all supply chains, in line with the recommendations of the OECD Due Diligence Guidance for Responsible Business Conduct, and specifically for mineral and metal supply chains, in line with the recommendations of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. This policy is also informed by the Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

SCOPE

This policy applies to all employees, managers, and directors at BRUNA, as well as contractors under BRUNA's direct supervision. It applies to all BRUNA operations and departments, and it extends to all supply chains.

We expect our business partners to uphold our commitments in this policy, as defined in our Code of Conduct for Business Partners and Materials Standard.

OUR COMMITMENTS FOR ALL SUPPLY CHAINS:

LEGAL COMPLIANCE

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.

ENVIRONMENTAL, SOCIAL, & GOVERNANCE PERFORMANCE

Beyond legal compliance, we are committed to building long-term partnerships with business partners 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. Our expectations for business partners are detailed in our Code of Conduct for Business Partners and Materials Standard.

We will engage with business partners to monitor and, where appropriate, improve performance, through the adoption and implementation of a risk management plan and measurable steps, to be achieved in reasonable timescales. In the most serious cases of non-compliance with this policy, our Code of Conduct for Business Partners or Materials Standard, or after failed attempts at mitigation, we reserve the right to suspend or discontinue trading

HUMAN RIGHTS

We commit to respect internationally recognized human rights standards¹, including in our supply chains. *Please refer to our Human Rights Policy for a detailed breakdown of our commitments and expectations for business partners with respect to human rights, including but not limited to the following areas: freedom of association and collective bargaining, voluntary employment, child labor, fair and equal treatment, wages and benefits, working hours, and health and safety.*

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.

For the avoidance of doubt, we prohibit the offering, promising, giving, or receiving 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.

LOCAL SOURCING & SUPPLIER DIVERSITY

We are committed to using our supply chain management practices as a force for good. To this end, where possible, we favor sourcing from local suppliers, including small businesses, that contribute to creating value in the communities in which we operate.

Where possible, in line with our commitments to promoting equity, diversity and inclusion, we will also favor sourcing from businesses owned by under represented populations, including but not limited to minority-owned, woman-owned, LGBTQ+-owned, and disability-owned businesses.

OUR COMMITMENTS FOR MINERAL & METAL SUPPLY CHAINS

SERIOUS ABUSES ASSOCIATED WITH THE EXTRACTION, TRANSPORT OR TRADE OF MINERALS:

We commit to neither tolerate nor profit from, contribute to, assist or facilitate the commission of:

- Any form of torture, cruel, inhuman and degrading treatment;
- Any form of forced or compulsory labor;
- The worst forms of child labor²;
- Other gross human rights violations and abuses;
- War crimes, violations of international humanitarian law, crimes against humanity or genocide.

Should we find a reasonable risk that our business partners are committing any of these abuses or are sourcing from, or linked to, any party committing these abuses, we will immediately suspend or discontinue trading with such business partners.

DIRECT OR INDIRECT SUPPORT TO NON-STATE ARMED GROUPS

We commit to not tolerate direct or indirect support³ to non-state armed groups⁴, through the extraction, transport, trade, handling or export of minerals. To this end, we commit to refraining from any action which contributes to the financing of conflict and we commit to comply with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions.

Should we find a reasonable risk that our business partners are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups, we will immediately suspend or discontinue trading with such business partners.

USE OF PUBLIC OR PRIVATE SECURITY FORCES

We affirm that the role of public or private security forces is to provide security to workers, facilities, equipment and property in accordance with the rule of law, including law that guarantees human rights. We commit to not provide direct or indirect support to public or private security forces that commit abuses or that act illegally as described in this policy.

Where any company in our supply chain contracts public or private security forces, where applicable, we will require that such security forces will be engaged in accordance with the Voluntary Principles on Security and Human Rights.

Should we find a reasonable risk that our business partners are sourcing from, or linked to, any party providing direct or indirect support to public or private security forces that commit abuses or that act illegally as described in this policy, we will immediately devise, adopt and implement a risk management plan with such business partners and other stakeholders to prevent or mitigate such risk. We will suspend or discontinue trading after failed attempts at mitigation within six months from the adoption of the risk management plan.

BRIBERY AND FRAUDULENT MISREPRESENTATION OF THE ORIGIN OF MINERALS

We commit to not 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.

MONEY LAUNDERING

We commit to support and contribute to efforts to eliminate money laundering where we identify a reasonable risk resulting from, or connected to, the extraction, trade, handling, transport or export of minerals.

PAYMENT OF TAXES, FEES & ROYALTIES DUE TO GOVERNMENTS

We commit to 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.

Should we find a reasonable risk that our business partners are sourcing from, or linked to, any party committing bribery, fraud, money laundering, or avoiding payment of taxes, fees, and royalties due to governments, we will immediately devise, adopt and implement a risk management plan with such business partners and other stakeholders as relevant to prevent or mitigate such risk. We will suspend or discontinue trading after failed attempts at mitigation within six months from the adoption of the risk management plan.

GOVERNANCE

We implement this policy through a robust governance system, by taking our accountabilities and responsibilities by heart, and by promoting meaningful stakeholder dialogue and transparency for the achievement of shared objectives.

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.

For mineral and metal supply chains, this policy is implemented and fully integrated into decision-making processes through a risk-based due diligence system aligned with the 5-step framework of the OECD Due Diligence Guidance for Responsible

Supply Chains of Minerals from Conflict-Affected and High-Risk Areas which includes:

1. Establishing a strong management system for due diligence;
2. Identifying and assessing risks in mineral supply chains;
3. Designing and implementing a strategy to respond to identified risks;
4. Carrying out independent third-party audits at key stages of transformation in mineral supply chains;
5. Reporting annually on supply chain due diligence.

For non-mineral supply chains, appropriate due diligence systems are also in place, in line with the recommendations of the OECD Due Diligence Guidance for Responsible Business Conduct.

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.

If you prefer to submit your grievance anonymously, please do so on our website <https://brunathelabel.com/pages/submit-a-grievance-anonymously>.

¹Internationally 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.

²As defined by the ILO Convention No. 182 on the Worst Forms of Child Labour (1999).

³"Direct or indirect support" to non-state armed groups includes, but is not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who: i) illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain; and/or ii) illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or iii) illegally tax or extort intermediaries, export companies or international traders.

⁴As per relevant UN Security Council resolutions.

Signature of the CEO



Date: 07 / 12 / 2022