



Responsible Jewelry Council- COP Manual

Eclats Jewelry Co., Ltd. is a Thailand based, Jewelry design and manufacturing company. Founded in January 1997. We recognize the importance of being a social responsible manufacturer and exporter. Therefore, we agreed to conduct the practice code that comply with the following responsible jewelry council's compliance guidelines:

1. The executive will provide a system to demonstrate that it maintains awareness and ensures compliance with relevant laws and/or responsibilities in relation to the code of practice - Responsible Jewelry council (COP-RJC) guidelines for society.
2. The company will implement policies in accordance with the RJC's code of practice and apply which is conducted in this manual.
3. Provide management systems for the policies that have already been announced and assign persons whom will take responsibility to identifying and assessing the risks in the implementation of policies, and prepare practices actively to make the requirements effective. This is to provide communication to employees, stakeholders and shared it to the public.
4. The company has conducted a review to assess the appropriateness, adequate and sustainable of existing practices, and take steps to resolve any gaps to succeed in accordance with the policy. At least once a year.
5. Report the results of the above compliance by communicating to the public and directly to stakeholders on regular basis. At least once a year.

The above guidelines will be adopted in the operation accordance with the company's policies which was announced as follows:

Responsible Supply Chain Policy

1. The company will conduct business with high ethical standards and strive for transparency and honesty which must comply with the requirements of the relevant laws.
2. The company takes great importance and respects human rights.
3. Implementation of business procedures in accordance with the criteria of the Organization for Economic and Cooperation Development, (OECD) regarding to minerals in conflict-affected and high-risk areas.
4. The company does not support corruption, fraud, giving or receiving bribes of all kinds.
5. The company will not involved in money laundering or financial support for terrorism.
6. The company will disclose raw materials related to production such as gold, silver, metal, platinum group metals, diamond, gemstone, sapphire or other



colored stones in the supply chain system, as well as the knowledge for selling products honestly in accordance with international standards.

7. The company will comply with the Kimberley process certification system or the voluntary warranty system of the World Diamond Council.
8. The company will maintain appropriate measures to transport products that remain in existing condition and safe.
9. The company will respect the retention of the information of its partners, and will not use or disclose without consent, nor will they infringe on the confidential information of the partners.

Human Rights Policy

1. The company will conduct its business with importance and respect to the law. Employees, executives must strictly comply with applicable laws.
2. The company will value and respect the human rights that are recognized internationally according to the laws, both in terms of basic guidelines and including rights in the workplace.
3. The company will not support and avoid human rights violations against others and will resolve any issues or impacts related human rights consequences.
4. The company will seek to prevent or mitigate human rights impacts in related.
5. The company will provide a process that represents due diligence process to identify, prevention, relief issues and impacts to Human Rights.
6. The company will be involved in considering the impact on Human Rights and rehabilitation through the legal process.

Due diligence on minerals sourcing from conflict- affected or high risk area.

1. The company will provide various policies to demonstrate responsibility in the mineral supply chain in order to comply with the OECD guidelines (Organization for Economic and Cooperation Development), which consists of human rights policy, non-forced labor, non-worst forms of child labor, non-violence, abuse or immoral conduct, non-support of terrorism, unlawful treatment of individuals security, non-support money laundering, giving or accepting bribes or not paying taxes, against all kinds of crimes against humanity.
2. Provide risk identification and assessment in clause 1 above for the source of raw materials and high-risk areas according to the OECD criteria.
3. Provide procedures for improvement or development to reduce risk and consider the operation.



4. In case of inability to assess risk, the Third-Party Audit method will be applied.
5. Reporting and review every year, as well as to communicate to the stakeholders.

Anti-corruption, Bribery policies

1. The company defines the meaning of corruption is giving in any kinds of bribery by proposing, pledges, acceptances, induced to illegal acts in giving, pledge, claim, or accept any money, property or other improper benefits directly or indirectly, for a person to act or refrain to perform duties, which is to acquire or maintain business or recommend business to the Company, or to obtain or maintain any benefits that improper for business.
2. The company and all employees will conduct their business with honest, integrity and transparency, not involve with any kinds of corruption, directly or indirectly.
3. The company and all employees will not be neglected or ignored when an action that is deemed to be a corruption act has been found, by inform the executive or the person who in charge.
4. The company and all employees will not accept or pay gifts or other endorsements for any individual who do business with the company beyond necessity. Receiving gifts must not exceed the value of the traditional occasion stipulated, and must be noted and report to the executive.
5. The company has established a channel for Whistle-Blowing Service for offences or received complaints by encouraging employees and stakeholders to monitor. If any employee or stakeholder finds any action which mislead from good governance principle, ethics, company regulations, illegal, action that violate the rights of stakeholders or may cause damage to the company. Employees or stakeholders can report any wrongdoing, violation of rights of stakeholders or any things that may cause damage to the company in such channels.
6. The company shall provide fairness and protection to any employee or whistle-blower who has reported or provided evidence in corruption related to the company, including employees who refuse fraudulent conduct, even if the Company loses its business opportunity without reducing position, punish or negative consequences. The company will provide care, protection whistle-blower or an appropriate cooperate on the reporting of corruption.
7. The company will keep the complaint or involve with the complaint's information confidentially and not disclosed to other persons unless necessary in order to operate accordance to the regulations or in accordance to the law. If the information is disclosed, The company will take disciplinary action and/or acts in the law as the case may be.



8. In case of sufficient evidence that the complainant behaves dishonestly or accuse the alleged offender. The company will take action to protect the reputation of the alleged offender by considering disciplinary action, or if the complainant is a third party and the company is damaged, the company may continue to take legal action.

Policies on Anti money laundering or financial terrorism.

1. The company is committed to protecting itself from being a part of the money laundering or financial terrorism support.
2. The company will document and apply the Know Your Counterparty (KYC) policy and procedures for business partners who are suppliers and customers with respect to gold, silver, PGM, diamonds, colored gems or jewelry products which assembled by these materials. Policies and procedures must:
 - (a) Be identify parties by checking government-issued ID card, This procedure adopted by the assessment the risk assessment, or related laws. For the sake of expressing ownership in accordance with the principles of the parties.
 - (b) Review the parties, and if possible, the owner who received the benefits is not list in an organization involved in money laundering, fraud or involvement with prohibited organizations and/or those financial conflicts.
 - (c) Maintain understanding in the nature and righteousness of the business.
 - (d) Investigate any unusual transactions or suspicious activities and money laundering report or finances of terrorism from the relevant authorities.
 - (e) Keep sufficient records for at least five years as required by the law.
3. The company will conduct the responsibility to comply according to the KYC's (Know Your Counterparties) policies and procedures.
4. The KYC's policies and procedures of the members must be current and appropriate, including training procedures of documentation and exam procedures as usual.
5. A record of all cash transactions or obvious links or cash-like transactions equal to or greater than 10,000 EUR/USD or the criteria set by applicable law (whichever is lower) as required by law. Members must report such transactions to the relevant assigned authorities.

Security Policy

1. The company will assess the safety risks and set protected standards. Employees, contractors, visitors, and employees employed by related business



partners, for stealing the product, damage or replacement of the product in the workplace or during exhibitions and delivery.

2. The company will ensure that all security personnel respect the human rights and dignity of everyone and will strictly use force only as necessary and at the minimum against threats.

Labour Management Policy

The company defines labour management policies by setting out the details in the Company's Working Regulations.

1. The company will provide employment conditions relating to wages, working hours and others by defined in the working regulations, and inform to employees.
2. The company will not avoid complying with labour and social security laws.
3. The company keeps appropriate employees record, including pay records, total wages, working hours, overtime hours.
4. The company will comply with labour law by requiring employees to have a normal working time of not more than 48 hours a week.
5. Overtime may occur with the consent of an employee under the labour law and will not be enforced, threatened to terminate or be forced to accept or quarantine or punishment for not working overtime.
6. The total number of hours of work, overtime will not over 60 hours per week, unless there is an agreement together or in exceptional circumstances such as peak production period or during an accident or emergency, which must be given the consent of the employee and appropriate equipment is required to protect the health and safety of the employee.
7. The company will arrange a weekly rest day at least 1 day a week, as defined in the working regulations.
8. The company will arrange for traditional holidays and leave, including maternity leave, annual holidays which will be paid according to the law, as defined in the working regulations.
9. The company will arrange annual holidays in accordance with labor law which will be paid.
10. The company will pay the employee not less than minimum wage rate as required by law.
11. Overtime pay arrangements will not be less than required by law.
12. The Company will arrange pay according to the methods and periods set forth in the Work Regulations.
13. The Company will not deduct employee wages unless permitted by law.
14. The Company will not force employees to purchase food or other services from the facilities provided to employees without choice.



15. The company does not pay advance wages, and the payment is subject to the law.
16. All kinds of violence and harassment in the workplace are prohibited, including no physical punishment. Acts of vilification or shame, sexual harassment, physical abuse, psychological abuse, verbal or sexual discrimination, interaction and intimidation, whether direct or indirect in any form are prohibited in the workplace. Employees must be treated with respect, honor, not under threat or violence or threaten against employees, family or colleagues.
17. The disciplinary process, the disciplinary procedures, the equal treatment of employees which is defined in the working regulations, have to inform to the employee.

Policy on worst form of child labour.

1. The company will not participate in or support child labour as set out in the ILO Convention, the 138th meeting and recommendation 146, which imposes a minimum age for basic work at 15 years old, so that children can complete compulsory studies.
2. The company will not participate in or support child labour in the worst form as defined in the International Labor Organization Convention, the 182nd meeting and recommendations from the 190th meeting, which include:
 - 1) The use of child labor in harmful way by its nature or circumstances which likely to be harmful to health, safety or morality in people younger than 18 years old.
 - 2) All forms of child slavery and practices similar to slavery, including debt, child trafficking and forced child labor and the use of children in combat.
3. If any place of child labor is found, the Company will document the use of child labor and provide a healing process that includes the ongoing welfare process of the child, and consider family status and rehabilitation, including the withdrawal of children participating in child labor, and in case of the child is subject to compulsory education or attends school, adequate support must be provided until compulsory graduation.

Non-forced Labour Policy

1. The company will not participate in or support forced labor, including binding, bonded, or involuntary labor, as defined in the 29th meeting of the International Labor Organization Convention.
2. The company will ensure that all employees work in voluntary situations, by:
 - 1) Not limit the freedom to move or the movement of employees in the workplace in an inappropriate area.



- 2) Not confiscate or hold employee's documents, such as ID card, work permit.
 - 3) Not recruit employees by fraudulent means or require employees to pay all or some money, property or fees for recruit personnel, If the employee is paid, it must be reimbursed.
 - 4) Not suspend any part of the salary, benefits or property of employees to force employees to continue their work, unless the suspension of wages or benefits imposed by labor law.
 - 5) No measures to prevent employees from terminating, after the notification is made at the appropriate time required by law.
3. The company will not engage in or support human trafficking or fraudulent recruitment by any means and/or binds employees to work, by communicating this requirement clearly to the recruiter, agent or service provider employees work for, and have to review their relationship and to resolve the negative impact on human rights.

Policy on Freedom of Association and Negotiation

1. The Company will respect the rights of employees to gathering independently in the organization they choose without interference or negative consequences. The company must ensure that employees who wish register or join their chosen organization are not threatened in any form.
2. The company respects the rights of employees to negotiate together and will adhere to the negotiation in the agreement. The company will participate in negotiations under the law, which is based on the principle of honesty in the negotiation.
3. In case that the law limited the right of freedom to association and negotiation. The Company will not obstruct alternatives choices under the Law.

Discrimination Policy

The Company will not implement or discriminate in any form in the workplace, in the terms of employment, the continuous work, payment, overtime access to training, professional Development promotion, termination or retirement, which includes discrimination based on race, skin color, ethnicity, caste, national origin, religion, disability, or genetic basis, gender, sexual orientation, union membership, popularity politics, marital status, parent or pregnancy situation, physical appearance, HIV status, age or other natural personal characteristics, which unrelated to job requirements. The Company will ensure that anyone who is 'fit to work' will receive equal and non-discriminatory opportunities on the basis of factors unrelated to their ability to perform tasks.



Safety & Occupational Health Policy

1. The company will provide safe and healthy working conditions for all employees in accordance with applicable laws and other relevant industry standards.
2. The company will also provide and maintain the workplace and accommodation in the relevant premises.
 - 2.1 Safe and accessible drinking water.
 - 2.2 Hygiene facilities for eating and storing food.
 - 2.3 The cleaning facilities and clean toilets correspond to the number and gender of the employee.
 - 2.4 Fire safety equipment and alarms.
 - 2.5 Clearly unlock mark, unlock emergency exits and escape routes.
 - 2.6 Access enough power supply and emergency light.
 - 2.7 Suitable conditions for pregnant women or nurses or alternative work arrangements to avoid improper workplaces.
3. The Company must assess the risk of harm in the workplace and take control to reduce the risk of accidents and injury to employees. Risk assessment scrutinizes the dangers associated with the activities and products of members, including the use of machines and mobile devices. In the case involving the storage and management of chemicals, including cleaning materials, excessive exposure to smoke, air borne particles, noise levels and temperature and/or lighting and insufficient ventilation, what's left of repetitive activities, considerations for workers under the age of 18 and pregnant women, and general hygiene and housekeeping issues.
4. The company will arrange the Health and Safety cooperation Board to pick up and discuss about health and safety issues with management.
5. Companies must provide training and information about health and safety to employees in the ways and languages that they can understand. It includes training and information about:
 - 5.1 Determining various roles related to health and safety hazards and procedures for specific controls.
 - 5.2 Appropriate action, in case of an accident or emergency.
 - 5.3 Fire and emergency safety procedures.
 - 5.4 First Aid Training for assigned employee representatives.
 - 5.5 The rights and responsibilities of workers to strike, or refuse to work in situations where there are uncontrollable hazards, and demonstrate these situations immediately to those who are near risk and to the management authority.



6. The Company still provide appropriate personal protective equipment (PPE) for free of charge and ready to wear, or appropriate caution.
7. The Company provides adequate access to first aid benefits in workplace, as well as trained first aid personnel. There is an appropriate process of transferring to the local medical facility, in case of medical emergencies and assist the operator who injure from work to access medical care in accordance with the laws of the country and the company's policies.
8. The Company will prepare emergency procedures and evacuation plans for health and safety with reasonable expectation and appropriate in case of emergencies. These must be accessible or clearly displayed, tested regularly (including through evacuation drills) and updated periodically.
9. The Company must investigate health and incidents, and presentation of results for review of related hazard control, identify opportunities for improvement.
10. The company will not use diamonds containing cobalt.

Environmental Policy

1. The company will comply with the relevant environmental regulations, rules and laws.
2. The company will protect, prevent or take any action to reduce environmental impact to the surrounding society.
3. The company will operate, manage, take action, improve, review and develop in related areas, as well as cultivate environmental consciousness effectively.
4. The company will encourage the conservation of resources by using 3R principle (Reduce, Reuse, Recycle) in the best benefits of the organization.
5. The company will provide environmental and energy conservation knowledge to employees, executives and others whom may concern.

In order to achieve this system, this will make the business sustainable. Hereby, announces to all employees and adheres to the common practice.

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(Mr. Jack Olcina)

Managing Director