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Code of Ethics

2025

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Code of Ethics

Drafting the Code of Ethics is part of a route taken by **FIOR SPA** and aims to lay down the principles and initiatives whose purpose is to affirm and communicate to the outside world the company's values based on the concept of "corporate social responsibility".

Introduction

1. Mission

FIOR SPA was founded in 1974 and is an Italian company specialised in the production of spring rings, stamped clasps and beads used to complete and embellish jewels made all over the world; work inspired by the pursuit of maximum quality and the desire to guarantee custom-made products and services for all customers.

This Code of Ethics contains the informing ethical principles and the rules of conduct with which the company's management, its employees, consultants, collaborators, agents, suppliers, business partners, and everyone who operates in the name or on behalf of **FIOR SPA** must comply in order to guarantee the correct operation, the reliability, and the reputation of the company, and in order to prevent any unlawful behaviours by anyone who operates in the name and on behalf of **FIOR SPA**.

The principles and the provisions of this Code list the general obligations of diligence, integrity, and loyalty that characterise the performance of work tasks and conduct in relations with the community and at the workplace.

The need to draft a Code of Ethics is the result of the awareness that integrity, reputation, and profitability depend mainly on the individual conduct of the company's directors, employees, collaborators, sub-contractors, and suppliers. The Code of Ethics, therefore, aims to lay down the principles, the values, and the behaviours that must inform, on a daily basis, the performance of activities.

The adoption of exemplary conduct from an ethical point of view is what makes it possible to maintain and increase the assets of trust, quality, and seriousness that **FIOR SPA** has accumulated through its years of activity.

During 2022, the company embarked on the new project for obtaining the RJC certification. The general goal is a responsible global production and supply chain that promotes trust towards the international jewellery industry. RJC certifies all companies, large and small, that prove compliance with the rules of a code of conduct with regard to social and environmental responsibility.

2. Corporate policy

The Corporate Policy constitutes a public declaration with regard to the principles that guide the commitment of **FIOR SPA** in matters of quality and social responsibility and that are indispensable for the definition of goals and improvement targets for the company's performance.

Available to all stakeholders, the Policy, approved by the Management on 24.03.2022, was drafted in order to guarantee that:

- it fits the purposes of the organisation;
- it includes the company's commitment to comply with all requirements of the standards of reference and with all requirements subscribed to by the company;
- it includes the commitment to comply with national laws and other applicable laws and to act in accordance with the transposed international instruments;
- it includes the commitment to continuous improvement and envisages a structural framework for the definition and review of improvement goals;

- it is accessible to all stakeholders by means of controlled posting and distribution to whoever requests a copy thereof;
- it is reviewed to ascertain its continued suitability.

3. Organisational structure

In order to ensure the proper implementation of the management system, **FIOR SPA** has identified the following roles:

- an RJC System Manager with the following powers and duties:
 - ensuring that a Social Responsibility System is put in place, applied, and maintained;
 - reporting to the entire management structure on the performance of the Management System and on the degree of satisfaction expressed by the stakeholders, in order to make it possible for such system to be reviewed and improved;
 - promoting inside **FIOR SPA** a culture of Quality and Social Responsibility, encouraging the introduction of management techniques and criteria;
 - promoting inside **FIOR SPA** the importance of meeting the implicit and explicit requirements of each stakeholder;
- a risk prevention and protection service, i.e. the set of people, systems, and external or internal means aiming to prevent and protect against professional risks at the company, that is to say in the production units; the members are as follows:
 - a company physician who possesses adequate qualifications;
 - a Health and Safety Officer (RSPP), who is able to represent the management in the protection of the health and safety of all personnel, who is authorised and tasked with implementing the health and safety factors envisaged; the abilities and professional requirements of the RSPP are suited to the nature of the risks present at the workplace and relating to the work carried out;
 - a Workers' Health and Safety Representative (RLS), elected and chosen by the operational personnel among its members to represent the workers on matters relating to aspects of occupational health and safety;
 - the first responders, tasked with implementing the measures necessary for first aid and emergency medical assistance;
 - the fire prevention staff, tasked with implementing fire-prevention and fire-fighting measures, with evacuating workers in cases of grave and immediate danger, with rescue.

The full organisational chart of **FIOR SPA** is available at the company.

Values

1. Ethics in the management of business

FIOR SPA bases the commercial relationships with its counterparties on principles of loyalty, fairness, transparency, efficiency, and openness to the market.

The activities carried out by **FIOR SPA** are carried out with professional commitment and rigour, acting so as to protect the company's prestige and reputation. The corporate goals, the projects, the investments made, and the improvement actions taken aim to develop, in the long term, the value and know-how of the company, and to increase the trust of all Stakeholders towards it.

In order to disseminate corporate ethics, the company has implemented and announced policies on anti-corruption and malfeasance in office, conflicts of interest, fraud, money laundering, and anti-competitive practices.

2. Work and human rights

By implementing a Social Responsibility model, **FIOR SPA** has endorsed a corporate culture that is informed by socially correct conduct towards the workers, with specific reference to the following principles:

- child labour
- forced or compulsory labour
- health and safety
- freedom of association and right to collective bargaining
- discrimination
- disciplinary practices
- working hours
- remuneration

FIOR SPA has deemed it appropriate to comply with these principles, not just to bear concrete witness to the duty of respecting the human rights of workers in all types of processes and organisation, but also to promote them among its partners.

3. Protection of the environment

FIOR SPA identifies and evaluates all environmental risks deriving from the performance of its activity, the impacts on the environment that are particularly significant, and the opportunities to improve compliance with environmental protection.

The company promptly and regularly carries out checks and inspections with the aim of minimising and reducing the environmental risks identified and the significant impacts. This with specific reference to the management of waste and the use of natural resources.

4. Supply chain management

The strategic role and the high environmental and social impact of the supply chain led **FIOR SPA** to launch a process for controlling the chain that goes beyond the economic-commercial aspects. It thus became necessary to promote a sustainable supply chain, that starts with a careful selection of new suppliers and continues by regularly reviewing and monitoring new and existing suppliers, to guarantee compliance with the parameters laid down by **FIOR SPA** in conformity with recognised standards. In this context, all internal activities of the company are also informed by full compliance with all legal provisions, voluntary standards, and the specific requirements of customers. Processes are planned and implemented in compliance with corporate procedures, constantly controlled by means of a monitoring system with performance and improvement indicators where required or where there is an opportunity, in full compliance with the principles of the Plan-Do-Check-Act cycle. All this in order to pursue maximum customer satisfaction, replying efficiently and promptly to all requests received.

Rules of conduct

1. Relationships with employees

Where employees are concerned, **FIOR SPA** has committed to complying with the following ethical principles:

- not exploiting or encouraging the use of child labour
- not exploiting or encouraging the use of forced labour
- guaranteeing a hygienic and safe workplace to all employees
- respecting the right of workers to join and form trade unions
- not implementing discrimination of any nature
- not using or promoting corporal punishment, mental or physical coercion, and verbal violence
- operating in compliance with international and national labour laws and with the National Collective Bargaining Agreement
- guaranteeing compliance with the minimum remuneration levels envisaged by the applicable legislation and by the National Collective Bargaining Agreement

FIOR SPA, as a whole, must behave equitably in mutual relationships and apply an employment policy founded on equal opportunities for all employees and collaborators, on dialogue, on listening to the needs and requirements of all in order to create a pleasant workplace environment, an atmosphere that encourages the frank and fair exchange of opinions, and promote the furtherance of personnel well-being. The company recognises the right of all to the confidentiality of their private life, and prioritises looking after its employees, their health and safety at the workplace, their professional growth, personal satisfaction, and motivation.

1.1 Empowering individual skills

FIOR SPA empowers creativity and professional skills. The fundamental goal is to allow each collaborator to best express their individual potential and to encourage them to use their talents in the best way.

This is why **FIOR SPA** pays attention to:

Training and accountability

It undertakes to provide constant training, both with regard to the work performance requested, and with regard to the accountability of its employees when it comes to compliance with the rules of conduct and the proper use of corporate assets.

Listening and dialogue

It undertakes to listen to and to engage in dialogue with its employees in an attempt to reconcile, where possible, the company's needs with their personal and family requirements.

For any grievance and/or corporate issue, the employees may address our Workers' Representative who will present such grievances to the management (as per the National Collective Bargaining Agreement) in writing.

Incentivising the spirit of belonging

It undertakes to encourage and incentivise, among its employees, the spirit of belonging, creating an internal climate of cooperation, of exchange of professional knowledge, indispensable for pursuing the corporate mission. In order to make it possible for the company to implement its commitments, employees must:

- show maximum commitment to training activities;
- manage responsibly the requests of leave related to personal or family needs, thus making the establishment of a relationship of mutual trust with the company possible;
- behave properly and professionally with their colleagues, avoiding competitive and ethically improper behaviours.

1.2 Protection of health and safety

FIOR SPA undertakes to guarantee hygienic and safe workplace environments, where the physical and mental health of each employee is protected through compliance with maximum accident prevention and protection levels, and through constant focus on improving safety conditions. In order to make it possible for the company to implement its commitments, employees must be prepared to participate in training events on health and safety; they also must pay maximum attention to the information they receive, and to compliance with all internal health and safety measures.

1.3 Equal opportunities

The company undertakes to guarantee the same opportunities to every employee, without distinction of gender, race, religion, political, personal and social opinions. In this sense, it applies criteria of merit and skills, without any discrimination, at all stages (selection, hiring, training, and salary raises).

Employee compliance with the principles contained in this Code of Ethics is considered an important indicator in the application of incentivising and professional growth systems.

2. Relations with the customers

FIOR SPA sees the customer as a partner with whom to work for the satisfaction not just of their needs, but also of corporate expectations, in a climate of transparency, respect for (environmental) requirements, and trust.

The relations with customers are informed by the value of attention, both in proposing unique creations that reflect the customers' tastes and expectations, and in managing any and all complaints with maximum seriousness and professionalism.

2.1 Commitment and professionalism

FIOR SPA undertakes to place its professionalism at the service of customers, with the aim of establishing long-term relationships with them that are based on mutual appreciation.

2.2 Confidentiality

It guarantees maximum confidentiality on the identity of its customers and on the exclusive products created for them. The employees must not use and/or disclose the confidential information acquired during their work, unless previously authorised.

3. Relations with suppliers and trade partners

FIOR SPA has structured a system for the selection, qualification, monitoring, and awareness-raising of its suppliers, requesting that they comply with the rules and commitments of the standards of reference and the system itself. It has identified the most critical sectors with regard to aspects of social and environmental responsibility and plans targeted audits of some suppliers in order to check, in the most direct manner, that the requirements are met.

3.1 Transparency in selection

It chooses its suppliers and trade partners in accordance with meritocratic criteria based on professionalism, on solidity, and on cost-effectiveness, applying internal procedures that aim to guarantee the highest levels of traceability and transparency. In particular, it only uses precious metals originating from refiners or suppliers of fine metal, gold or silver, listed in the LBMA Good Delivery List, holders of RJC certification, and who comply with the social responsibility principles promoted by **FIOR SPA** itself.

3.2 Awareness-raising and training

It undertakes to raise the awareness of its suppliers and trade partners on the topics of this Code of Ethics, in order to demand compliance with the rules of conduct that are consistent with those indicated herein, especially with reference to respect for human rights and workers, the rights of children, and the sustainable and responsible management of the environmental and social impacts.

3.3 Fair relations

It undertakes to establish relations with its suppliers and trade partners that are characterised by fairness and transparency, and to set forth fair contractual terms and conditions. Suppliers and trade partners must guarantee maximum professionalism, seriousness, and timeliness in the provision of the services requested.

4. Relations with the market

4.1 Fair competition

In pursuing its mission, **FIOR SPA** undertakes to comply with the rules of fair competition and transparency in business, exchanging views with competitors in a serious and collaborative manner.

4.2 Management of sensitive information

It undertakes to handle sensitive or privileged information pertaining to the company, its customers, suppliers, trade partners, competitors with maximum confidentiality and in compliance with the regulatory framework of reference.

5. Relations with the environment

It endorses sustainable and efficient management policies to minimise the negative impact on the environment.

In the performance of their daily work-related tasks, employees are called upon to consume paper, water, electricity sustainably and to comply with the measures relating to the separate collection of waste.

FIOR SPA undertakes to comply with all environmental standards, even those that pertain to neighbourliness. There have never been any reports of issues, protests, or exposés by its neighbours.

6. Relations with the Public Administration and Institutions

We undertake to ensure maximum levels of integrity and transparency in establishing relationships with the supervisory and control Authorities, with the Courts, and, in general, with any and all Public Officers, as well as with all competent Institutions in our local area.

7. Relations with other stakeholders

Associations and NGOs

It is the company's intention to establish collaboration relationships with NGOs and voluntary associations that operate in the protection of people's rights.

Banks

It is the company's intention to strengthen the collaborative relationship with the banking system, so that the appreciation and trust granted to **FIOR SPA** remain intact.

Trade unions

The company's attitude towards trade unions is informed by transparency, dialogue, and collaboration.

Means of implementation

Without prejudice to the powers of the company's bodies pursuant to the law, all recipients of the Code of Ethics must:

- actively contribute to the implementation of the Code of Ethics in the context of their skills and responsibilities;
- be familiar and comply with the principles and contents of the Code of Ethics in relation to the tasks performed and the powers allocated;
- comply with all internal decrees introduced by **FIOR SPA** in order to implement the Code of Ethics or identify violations thereof;
- report to the RJC System Manager any presumed violations of the Code of Ethics.

Persons who hold management, responsibility, or executive posts must set an example and provide guidance in compliance with the principles contained in the Code of Ethics to their subordinates and ensure that the latter are aware that the company's activity must always be carried out in compliance with the principles of the Code of Ethics.

Final provisions

The policy of **FIOR SPA** with regard to the Responsible Jewellery Council (R.J.C) and all its decrees is reviewed by the company once a year. The related information is inserted in this Code of Ethics.

This Code of Ethics is approved by the Management of **FIOR SPA**; all amendments to and/or updates of the Code must be submitted to the approval of the aforementioned Board of Directors.

Date 20.05.2022

Reconfirmed on: 24.03.2025

THE MANAGEMENT



Corporate Policy

2025

Quality at the company

The company's Management, deeming that Quality - understood as the ability to satisfy the Customer's expectations - constitutes the main factor of success, intends to pursue a modern management of the corporate organisation, aiming to the optimal use of resources.

In particular, it considers the following general priority goals to be business values:

- ◆ **always maintaining high levels of stakeholder engagement, especially that of its customers and partners**
- ◆ **making all assessments based on objective proof and in compliance with the applicable standards and regulations**
- ◆ **facilitating its people's participation and sharing process, in particular that of employees and collaborators**

The company puts in place suitable plans and actions for the furtherance of the aforementioned strategic goals.

In order to pursue such goals, the Management undertakes to guarantee that all human resources are aware thereof and contribute towards their furtherance.

The Quality Policy is implemented on a daily basis by all personnel, under the constant attention and supervision of Management.

The Management, taking into account the internal and external factors that are pertinent for its purposes, implements the following strategies that influence the ability to reach the expected results of its quality management system.

- Continuously reviewing the Quality Policy to guarantee that everyone understands its contents;
- Paying maximum attention to the identification and fulfilment of its personnel's needs;
- Guaranteeing constant action for empowering, motivating, and encouraging the professional growth of people;
- Continuously improving the image of a responsible and efficient company;
- Guaranteeing the availability of professional skills that are always suited to the needs of the stakeholders and of the market;
- Continuously improving the quality of the company's management and of the products offered.

Aside from quality, the company recognises the importance of its Social Responsibility. That is why it has set itself the goal of complying with certain topics.

Ethics in business:

- we undertake to perform and carry out our activities in full compliance with ethical standards, guaranteeing integrity, transparency, and conformity with the applicable laws;
- we do not practice bribery and/or corruption;
- we do not tolerate the laundering of dirty money and/or the financing of terrorist activities;
- we undertake to make the characteristics of the products sold fully known in detail;
- we undertake to adopt suitable measures in order to guarantee integrity and safety in the shipment of products.

The rights of human beings:

- we respect the fundamental human rights and the dignity of individuals, in accordance with the Universal Declaration of Human Rights approved by the United Nations;
- we do not have recourse to child labour;
- we undertake not to have recourse to any form of forced labour, on security, bonded labour, or prisoner labour, and not to limit the employees' freedom of movement;
- we undertake to guarantee high hygiene and safety standards in the offices and during the activity;
- we undertake not to impede the free association of workers;
- we undertake not to discriminate in any way based on race, ethnic origin, caste, country of origin, religion, disability, gender, sexual orientation, trade union membership, pregnancy, political affiliation, marital status, physical appearance, age, or other restriction that is not allowed at the workplace, so that all people "suited to work" are afforded equal opportunities without discrimination based on factors that are not related to the ability to perform the duties envisaged;
- we do not have recourse to corporal punishment under any circumstances and to degrading treatments, harassment, abuse, coercion, or intimidation in any shape or form;
- we undertake to comply with the legislation in force on matters pertaining to working hours and remuneration, or, in the absence of such legal requirements, to adopt the standards that prevail in the sector;
- we undertake to support the development of the communities in which we operate, contributing to economic and social well-being.
- In this sense, we undertake to support the ethical standards of the jewellery sector and to support the steps taken by our customers and suppliers in managing the environmental and social issues relating to the production and distribution of gold products.

More in general, the corporate procedures of FIOR SPA guarantee a high level of ethical conduct, including compliance with the local laws wherever the company entertains employment relationships and promoting basic values, such as honesty and integrity.

Protection of the environment:

- we undertake to carry out our activities in an environmentally responsible manner;
- we undertake to manage the environmental impact of our activity, eliminating or minimising the negative effects on the environment;
- we undertake to guarantee environmental efficiency in our activity;
- we undertake to adopt practices that increase biodiversity and reduce negative consequences for biodiversity.

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THE MANAGEMENT



Human Rights Policy

2025

This Policy reinforces what has already been stated in the Code of Ethics and constitutes a manifesto that binds **FIOR SPA** to promoting the protection of human rights in full compliance with the regulatory framework and the standards issued by international organisations of reference, among which:

- the Universal Declaration of Human Rights and the subsequent international conventions on civil and political rights and on economic, social, and cultural rights;
- the Conventions of the United Nations on the rights of women, on the elimination of all forms of racial discrimination, on the rights of children, on the rights of people with disabilities;
- the Declaration on Fundamental Principles and Rights at Work and the eight fundamental Conventions of the International Labour Organisation (ILO);

The approach adopted by the company aims to protect the rights of the persons who are part of its “value chain”, including its workers, suppliers, and partners, immigrants, children, persons with disabilities, persons who have fallen victim to discrimination and any and all forms of violence, the local communities, and the customers, drawing inspiration from the following principles:

Non-discrimination: **FIOR SPA** undertakes not to discriminate in any way based on race, ethnic origin, caste, country of origin, religion, disability, gender, sexual orientation, trade union membership, pregnancy, political affiliation, marital status, physical appearance, age, or other restriction that is not allowed at the workplace, so that all people “suited to work” are afforded equal opportunities without discrimination based on factors that are not related to the ability to perform the duties envisaged

Fair and favourable working conditions: **FIOR SPA** undertakes to comply with the legislation in force on working hours and remuneration, or, in the absence of such legal requirements, to adopt the prevailing standards of the sector; we undertake not to have recourse to any form of forced labour, on security, bonded labour, or prisoner labour, and not to limit the freedom of movement of employees; we do not have recourse to corporal punishment under any circumstances and to degrading treatments, harassment, abuse, coercion, or intimidation in any shape or form

Occupational health and safety: **FIOR SPA** undertakes to guarantee high hygiene and safety standards in the offices and during the activity

Culture and skills: **FIOR SPA** undertakes to promote the development of the human capital through the implementation of specific training initiatives aiming at the professional and cultural growth of employees and of the persons involved in the company’s activities;

Freedom of association and collective bargaining: **FIOR SPA** undertakes not to impede the free association of workers;

Fight against child and forced labour: **FIOR SPA** does not have recourse to child labour (in light with the affirmations of Recommendation no.146 and ILO Convention no.138, according to which: “The minimum age (...) shall not be less than the age of completion of compulsory schooling and, in any case, shall not be less than 15 years”. “The minimum age for admission to any type of employment or work which by its nature or the circumstances in which it is carried out is likely to jeopardise the health, safety or morals of young persons shall not be less than 18 years”).

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THE MANAGEMENT



Policy for Sustainable Procurement

FIOR SPA, recognising that the activities for the extraction, trade in, handling, and export of precious metals originating from conflict and high-risk zones may entail risks of significant negative effects, and endorsing respect for human rights and the desire not to contribute in any way to the conflicts, undertakes to adopt this policy, disseminate it to its suppliers, and raise their awareness thereof. The company undertakes to refrain from any action that may contribute to financing conflicts and to comply with the relevant sanctioning resolutions of the United Nations, or, where applicable, the national laws that apply said resolutions.

The company, as member of the RJC, by means of an independent external audit, provides proof that:

- it respects human rights in conformity with the Universal Declaration of Human Rights and with the Declaration of the International Labour Organisation on fundamental principles and rights at work
- it does not carry out or tolerate malfeasance in office, corruption, money laundering, or the financing of terrorism;
- it supports the transparency of payments
- it does not provide direct or indirect support to armed groups
- it has drafted a procedure that describes the means by which the stakeholders can express worries
- it implements a management system for due diligence activities based on risk, with regard to the chains of responsible procurement of minerals from conflict and high-risk areas

In the procurement process, the company undertakes to comply with the following principles:

1. it does not tolerate:

- any form of torture or cruel, inhuman, or degrading treatment
- any form of forced or compulsory labour, the term applying to all labour or service requested from a person under the threat of punishment and for which said person has not voluntarily offered himself or herself
- child labour
- other abuses and grave violations of human rights
- war crimes or other grave violations of international human rights law, crimes against humanity, or genocide

2. it does not allow trade relationships with suppliers and customers for which there is a suspicion of reasonable risk with regard to abuses or who may be involved in or related to the aforementioned crimes

3. it does not tolerate any direct or indirect support through the purchase of precious metals to armed groups or their associates which:

- control mining sites, transport routes, points where the precious metals are negotiated, and actors upstream of the procurement chain
- illegally tax or extort money or precious metals from mining sites, during transport, or at the points of trade
- illegally tax or extort money or precious metals from intermediaries, export undertakings, and international traders

4. it does not allow or will immediately interrupt business relationships with suppliers should it identify a reasonable risk that such suppliers may procure from or be in any way related to non-state armed groups through direct or indirect support

POLICY FOR SUSTAINABLE PROCUREMENT

5. **declares** a commitment not to provide direct or indirect support to the public or private security forces that control, illegally tax, or extort money from mining sites, along transport routes, at the points where the precious metals are negotiated, towards intermediaries, export undertakings, and international traders
6. **it states that** the role of public or private security forces is to guarantee the safety of workers, plants, equipment, and goods in line with the rule of law, including the Standards that guarantee human rights
7. **offering, promising, or requesting bribes is forbidden** and we are firmly opposed to seeking bribes, to the request to occult or hide the origin of the gold/silver or to make false declarations on taxes, duties, tariffs, and royalties paid to governments for the extraction, trade in, handling, transport, and export of the precious metal.
8. **it does not allow** any form of money laundering and supports the efforts for the effective elimination of the laundering of money deriving from, or related to, the extraction, trade in, transport, or export of precious metals.

The company asks that its employees, agents, consultants, and trade partners comply with this policy, and, in order to apply it, we will implement suitable disciplinary actions, which may go as far as dismissal or the interruption of contracts.

This policy has been drafted with reference to the principles of the OECD Due Diligence Guidance for Responsible Supply Chains.

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