

**Corporate Responsibility Policy**  
**Aligned with RJC Code of Practices 2024**

**Introduction**

As a certified member of the Responsible Jewellery Council (RJC), Vulcan and Co intend to provide customers with the trust that its value chain is managed responsibly. In the conduct of its activities, it is committed to complying with all applicable laws, regulations, and national and international convention. It also strives to improve its performance with regards to ethics, social responsibility, and protection of the environment.

As such, it respects and follows the principles provided by its own Code of Conduct and Responsible Procurement Policy as well as the Convention of the International Labour Organization (ILO), the Universal Declaration of Human rights, the United Nations Global Compact and the UN Sustainable Development Goals.

Vulcan and Co. requires its business partners and suppliers to ensure their own operations comply with and respect applicable laws and ethics principles. This Supplier Code of Conduct fosters a set of core practices in the areas of business integrity, labour policies and environmental protection that Vulcan and Co applies and requires its suppliers to align with.

When national legislation or other applicable regulations address the same issue as this Supplier Code of Conduct, the most restrictive provisions shall apply. When this Supplier Code of Conduct is in contradiction with applicable law, the law shall apply.

Our suppliers remain the guarantors towards Vulcan and Co for work performed by their subcontractors and own suppliers to guarantee compliance to this Supplier Code of Conduct and relevant obligations.

**Business integrity**

**Legal requirements:** Suppliers are required to comply with local, national, and international laws in the conduct of their operations. They should design and implement procedures allowing them to identify, monitor and understand the legal framework they are subject to.

**Fiscal requirements:** Vulcan and Co. applies a zero-tolerance policy regarding tax avoidance (taxes, customs, fees or royalties due to governments).

**Corruption:** Vulcan and Co require its suppliers to respect applicable laws as regards to corruption and to take measures to prevent, detect, alert, and sanction. Forms of corruption notably include bribery, extortion, influence peddling, embezzlement.

**Gifts and gratuities:** Suppliers should not offer or accept any gifts and gratuities that might compromise their ability to take fair business decisions. Gifts and gratuities may be deemed acceptable expressions of courtesy within the context of business relations if limited in scope and value, given transparently, permitted under applicable law, customary in the location where given and not offered with an expectation to obtain something in return.

**Conflicts of interest:** Suppliers are expected to prevent the occurrence of situations that would generate potential conflicts of interest within the scope of their business relationship with Vulcan and Co.

**Money— laundering:** Suppliers are expected to take all appropriate measures to prevent their operations from being used as vehicles for money-laundering.

**Terrorist financing:** Suppliers are expected to take all appropriate measures to ensure they are not directly or indirectly supporting non-state armed groups. They shall proceed with extra caution when making payments to charities or dealing with new customers.

**Confidentiality:** Suppliers should adopt ethical business principles and guarantee the respect and confidential treatment of intellectual property and trade secrets and non-publicly available information gathered as part of their business relationship with Vulcan and Co.

**Protection of personal data:** Suppliers are required to comply with all applicable laws and regulations pertaining to personal data collection and protection.

**Information transparency:** Suppliers are required to provide clear and accurate information regarding the resources and methods they use, their production sites and the characteristics of products or services they supplied. They are also expected to conduct their business operations with transparency and to reflect these operations in their books.

**Grievance mechanism & whistleblowing:** We recommend all suppliers to set up a grievance mechanism that would guarantee both employees and business partners an effective and respectful communication with Direction in case they wish to lodge a complaint.

## **Social responsibility**

**Child labour:** Suppliers and their facilities must not employ children under the age of 15. In countries where the age limit to complete compulsory education is above 15, or the legal limit for child labour is above 15, the highest of both age is applicable. In any cases, young workers below the age of 18 must be employed in conditions that do not jeopardize their physical and mental health. Young workers should therefore be considered in precise circumstances such as formation programs. In all cases, suppliers are responsible for accurately documenting and keeping records of the date of birth of past and present employees. Where government issued identifications are not available, an independent mean should be used (i.e., medical, or religious records).

**Forced or undeclared labour:** Employees of our suppliers and business partners shall be free to accept or quit their position. Accordingly, forced labour, slavery, convict labour and human trafficking are strictly prohibited. Suppliers shall be particularly cautious to identify and remediate situations where an employee is forced into work to repay a recruitment commission or due to the retention of his identification or travel documents. Suppliers are also required to prevent clandestine and undeclared employment.

**Fair treatment, non-discrimination, and gender equality:** Suppliers shall not use physical, sexual, mental, nor verbal harassment toward its employees. We expect all workers to be treated with due respect and dignity. Additionally, we expect all workers to be treated equally and fairly. Therefore, suppliers should avoid all forms of discrimination whether based on gender, race, religion, nationality, age, caste, political views, sexual orientation, or any other group mentioned in anti-discrimination laws. Suppliers shall be careful in all circumstances and more specifically as regards to recruitment, wage, formation, benefits, promotion and dismissal.

**Work hours:** The regular work schedule of any employee must not exceed 48h of work (or 60h including compensated overtime) for a six-day period. Each employee must receive at least one day off per week. Suppliers are expected to comply with the International Labour Organization (ILO) standards. This includes the existence of a tracking system for work hours.

**Wage and benefits:** Suppliers are required to comply with applicable laws to compensate work and overtime. They should set a level of compensation which ensures each employee can afford his/her essential needs. Suppliers are also expected to provide their employees with periodic pay slips disclosing the days or hours worked and the wage to be paid. Wage deductions should not be used as disciplinary measures.

**Freedom of association:** Suppliers should not prevent employees from associating freely with any lawful and peaceful workers' or collective negotiation association. Where local labour laws restrict these freedoms, suppliers are encouraged to facilitate parallel means of free association and bargaining for the personnel. Employees who chose to join such an association shall not be discriminated against or sanctioned in any way.

**Health and safety:** Suppliers are required to provide a safe and healthy working environment for their employees in accordance with applicable local laws and any specific regulations related to their industry. Suppliers are expected to share with their employees an adequate set of procedures, equipment, and trainings to prevent and mitigate work injuries and workplace accidents. Suppliers shall be encouraged to nominate a health & safety supervisor to monitor workplace compliance (particularly in terms of fire safety). All employees shall be granted at least access to sanitary and drinkable water.

**Local communities:** It is highly recommended for suppliers to commit itself to the sustainable development of the communities located close to their business operations by investing in employment, training, and construction for example.

### **Protection of the environment Climate action**

Vulcan and Co require that its suppliers respect local and international laws, regulations, and standards as regards to the protection of the environment. Additionally, it expects its suppliers to take a step further in their commitment by (i) drawing an accurate picture of their environmental footprint and (ii) building a decision-making system aiming at improving this picture.

**Environmental footprint:** Vulcan and Co expect its suppliers, to the best of their ability, to measure the impact of their operations in terms of resources consumption (incl. water and energy), digital pollution, use of chemical and hazardous substances, production of air emissions (incl. greenhouse gas) and pollution of water and soil. It also expects them to be aware of the main issues at stake for the ecosystems they evolve in as regards to biodiversity.

**Environmental management system:** once suppliers have reached a better knowledge of their environmental footprint, Vulcan and Co expects them to build a decision-making system aiming at improving this picture. This includes tackling all issues mentioned above by assessing how operations could shift to green energy and low-carbon transportation, how hazardous chemicals could be replaced or reduced, how overall resources' consumption could be reduced, how waste management could be improved, how to develop recycling (sustainable packaging, water reclamation).

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## **Diamond industry specifics**

**Traceability:** Vulcan and Co requires its suppliers to communicate honestly as regards to the nature of the products they supply. This implies the existence of a reliable internal tracking system with sufficient technology to gather and record all of a product's history, from the origin of the stones, its method of extraction, its transportation routes, the service suppliers it went through, its characteristics (weight, cut, clarity, colour), the treatments it might have undergone as well as all taxes paid, and all payments made to government agencies. Suppliers are expected to align with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

**Naturality:** Vulcan and Co require its suppliers to equip themselves to ensure the diamonds they sell are exclusively of natural origin and have not been treated. We remind 100% of non-GIA certified diamond shall be verified according to these criteria. Vulcan and Co require written guarantees addressing naturality and non-treatment of all diamonds it purchases. Any supplier encountering issues regarding the naturality of diamonds provided shall warn Vulcan and Co immediately.

**Conflict-free procurement:** Vulcan and Co adhere to responsible diamond procurement practices and guarantees to its own customers all diamonds were acquired or purchased from legitimate sources not involved in conflict financing, in accordance with United Nations Resolutions and applicable national laws. Vulcan and Co adhere to the World Diamond Council System (WDC) and follows the guidelines of its System of Warranties (SoW) to guarantee the stones it sells are conflict free. In this framework, Vulcan and Co requires all its suppliers to fully adhere to the SoW as well and requires similar written guarantees.

Vulcan and Co remind its suppliers that the principles of the diamond industry self-regulation initiatives are based on the voluntary creation of a chain of written warranties from invoice to invoice for all transactions involving the purchase and sale of diamonds. Therefore, it requires suppliers to agree, represent and warrant that they do collect all the necessary warranties previously mentioned (cf. "Traceability").

Supplier shall comply with the following warranty statements and print them on all finished goods invoices remitted to Vulcan and Co:

**"The diamonds herein invoiced are exclusively of natural origin and untreated based on personal knowledge and/or written guarantees provided by the supplier of these diamonds"**

**"The diamonds herein invoiced have been purchased from legitimate sources not involved in funding conflict, in compliance with United Nations Resolutions and**

**corresponding national. “Supplier name” hereby guarantees that these diamonds are conflict free and confirms adherence to the WDC SoW Guidelines”**

By signing this Supplier Code of Conduct, your company commits to take reasonable steps to ensure that all diamonds are supplied in accordance with Vulcan and Co policy on responsible sourcing from Conflict-Affected and High-Risk Areas.

### **Assessment**

Vulcan and Co expect its suppliers to communicate the principles of the Supplier Code of Conduct to their employees, sub-contractors and any other third parties with whom they do business to ensure the principles are fully integrated into their operations.

Suppliers should report all existing or potential discrepancies between their current operations and the requirements set out in this Code and propose recovery and remedial action plans.

Vulcan and Co purchasing staff will be trained to assess whether best practices reminded in this Supplier Code of Conduct are being implemented as regards to the procurement of diamonds and may involve colleagues and third parties to assist them.

Vulcan and Co shall be entitled to request information from its suppliers as to their compliance with the terms of this Supplier Code of Conduct, notably through a self - assessment questionnaire. Where necessary, Vulcan and Co may require a supplier to provide evidence of its compliance by way of independent certification.

Vulcan and Co shall be entitled to visit suppliers’ production facilities and the facilities of their sub-contractors and suppliers to establish whether the terms of this Supplier Code of Conduct are being complied with.

### **Non- compliance**

In the event of any violation of this Supplier Code of Conduct by one of its suppliers or subcontractors, Vulcan and Co reserve itself the right to review the business relationship and possibly terminate it in conformity with applicable law, even if there is no written contract formalizing this relationship, without prejudice to the other rights of Vulcan and Co or remedies it might seek.

**Acknowledgment**

<b>Company name:</b>			
<b>Address:</b>			
<b>Contac name:</b>		<b>Position:</b>	
Does your company have an individual contact responsible for the implementation of Vulcan and Co Supplier Code of Conduct?			
<input type="checkbox"/> Yes			
<input type="checkbox"/> No			
If yes, please provide contact information:			

We hereby acknowledge the reception of Vulcan and Co Supplier Code of Conduct and accept its terms and conditions,

Signature and company stamp:

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Signatory name:

Made in:

Date: