

Vulcan & Co. Human Rights Policy

Effective Date: May 2025

Approved By: Gil Melamed – Managing Director

1. Introduction

Vulcan and Co. is committed to respecting and promoting human rights in all aspects of our operations and business relationships. We recognize our responsibility to prevent, mitigate, and remediate potential and actual human rights impacts, and we align our practices with the **United Nations Guiding Principles on Business and Human Rights (UNGPs)**.

This policy reflects our commitment under the **Responsible Jewellery Council (RJC) Code of Practices 2024**, including compliance with **COP 6 (Human Rights)** and **COP 2 (Policy and Implementation)**.

2. Scope

This policy applies to:

- All employees, contractors, and management of Vulcan and Co.
 - All suppliers, subcontractors, and business partners within our value chain.
 - Visitors and temporary personnel present at any Vulcan premises.
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3. Policy Commitment

Vulcan and Co. commits to:

- Respect internationally recognized human rights as defined in the **Universal Declaration of Human Rights**, the **International Labour Organization (ILO) Core Conventions**, and related instruments.
- Integrate human rights considerations into our business strategy, risk assessments, and daily operations.

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- Avoid causing or contributing to adverse human rights impacts, and address such impacts when they occur.
- Promote responsible business conduct among our suppliers and partners through engagement, requirements, and shared accountability.

This commitment is endorsed by senior management and reviewed annually.

4. Key Human Rights Principles

Vulcan and Co. strictly prohibits and actively works to prevent:

- **Child labor** (in accordance with ILO Convention 138 & 182)
- **Forced, bonded, or compulsory labor**
- **Discrimination and harassment** based on race, gender, religion, age, disability, sexual orientation, or any other protected status
- **Unsafe and unhealthy working conditions**
- **Abuse of migrant, temporary, or contract workers**
- **Interference with the rights to freedom of association and collective bargaining**

We support fair wages, reasonable working hours, and safe working environments.

5. Implementation Procedures

To implement this policy, Vulcan and Co. has established the following processes:

- **Policy Integration:** Human rights expectations are embedded in our Supplier Code of Conduct, KYC requirements, internal work protocols, and due diligence processes.
- **Supplier Engagement:** All suppliers must comply with our human rights standards and submit supporting documentation. We assess their practices during onboarding and throughout the business relationship.
- **Training & Awareness:** Employees are trained on human rights responsibilities during onboarding and through periodic refreshers.
- **Grievance Mechanism:** A confidential reporting channel is available to all stakeholders to raise human rights concerns without fear of retaliation.
- **Monitoring & Review:** We conduct internal audits and supplier reviews, and report on findings related to human rights performance.

6. Remedy & Continuous Improvement

Where we identify that we have caused or contributed to adverse human rights impacts, we commit to taking appropriate and timely corrective action. We work with affected parties to remediate harm and review our policies and procedures to prevent recurrence.

We are committed to continuous improvement and regularly review this policy and our due diligence framework to reflect evolving risks and stakeholder expectations.

7. Governance and Accountability

The responsibility for overseeing the implementation of this policy lies with **[Designated Responsible Person – e.g., Liora Borosky Chayu]**. This includes:

- Ensuring training and communication
 - Leading human rights risk assessments
 - Coordinating grievance investigations and follow-up
 - Reporting on human rights performance to senior leadership
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Signed:

Gil Melamed
Managing Director
May 2025

A rectangular stamp with the text "Vulcan and Co" and the number "540226123" below it. Below the stamp is a handwritten signature in blue ink.