

July 2025

## Vulcan and Co. - Supplier Code of Conduct

Corporate Responsibility Policy Aligned with RJC Code of Practices 2024

#### Introduction

As a certified member of the Responsible Jewellery Council (RJC), Vulcan and Co. intends to provide customers with the trust that its value chain is managed responsibly. We are committed to complying with all applicable laws, regulations, and conventions. Our practices reflect the Universal Declaration of Human Rights, ILO Conventions, the UN Global Compact, and the Sustainable Development Goals. This policy outlines the standards we expect from our suppliers in areas such as business integrity, labor, human rights, environmental stewardship, and ethical sourcing.

This Supplier Code of Conduct also serves as Vulcan and Co.'s public supply chain policy in accordance with COP 7.1a and Annex II of the OECD Due Diligence Guidance.

## **Business Integrity**

Suppliers must comply with all applicable laws, prevent corruption, and avoid conflicts of interest. Bribery, money laundering, and financing of terrorism are prohibited. Suppliers are expected to maintain transparent records, protect personal data, and uphold confidentiality.

## **Social Responsibility**

Vulcan and Co. requires suppliers to uphold human rights, prohibit child and forced labor, ensure fair wages, allow freedom of association, and guarantee safe working conditions. Discrimination and harassment are not tolerated.

## **Environmental Protection & Climate Action**

Suppliers must comply with environmental laws, measure their footprint (energy, water, GHG emissions), and work towards reducing negative impacts. We encourage implementation of environmental management systems.

## **Diamond Industry-Specific Requirements**

Suppliers must guarantee traceability, naturality, and conflict-free sourcing. All diamonds must comply with the Kimberley Process and be accompanied by written warranties and SoW statements. Vulcan and Co. expects alignment with OECD Due Diligence Guidance.



## **Assessment & Monitoring**

Suppliers must communicate this policy to their teams and sub-contractors, and cooperate with Vulcan and Co. in assessments and audits. Vulcan reserves the right to terminate relationships in case of non-compliance.

# **Acknowledgment**

By signing below, the supplier confirms that they have read, understood, and agree to comply with Vulcan and Co.'s Supplier Code of Conduct.

Company Name:	
Authorized Representative:	
Гitle:	
Signature:	
Date:	