

Corporate Responsibility Policy of NORRESLET, S.L.

In relation to applicable legislation and regulations:

- A. To Ensure and guarantee that all business activities are carried out in a more ethical, professional manner. NORRESLET, SL will operate in accordance with relevant national and international legislations/regulations as applicable in the countries in which they operate.
- B. All personnel are expected and directed to comply with all applicable laws and regulations, as well as all internal rules and policies of the entity related to its business activities. It is also the responsibility of staff to know and understand the legal, regulatory and internal requirements that apply to their jobs.

In relation to economic administrative financial management, money laundering, financing of terrorism, corruption and facilitation payments:

- C. NORRESLET, SL is committed to combating dishonesty and fraud in all commercial transactions in order to maintain and improve consumer trust and the reputation of the jewelry industry.
- D. All collaborators of NORRESLET, S.L. They will maintain an attitude of respect and collaboration with public authorities, regulatory bodies or any other authority within the framework of their powers. NORRESLET, S.L. will not finance political parties, their foundations, representatives or candidates, both in Spain and abroad, nor will it sponsor any event whose exclusive purpose is political propaganda and could thereby obtain benefits in its commercial transactions.
- E. Any Collaborator, Manager or Administrator who is investigated, accused, or called as a witness in a judicial procedure related to their professional activity at NORRESLET, S.L. or are aware of any other judicial procedure that may have an impact, you must inform the management as soon as possible. Likewise, they must be informed of the existence of Administrative Files or of any other nature that affect them in the framework of their work activity, regardless of their relationship with said file.
- F. NORRESLET, S.L. requires strict compliance at all times, with all applicable national and, where applicable, international laws/regulations with respect to money laundering, terrorist financing, bribery, payment facilitation, corruption, smuggling,

embezzlement, fraud, organized crime, transfer pricing and tax evasion in all relevant jurisdictions. NORRESLET, SL will not offer or accept any payment, gift in kind, hospitality, expense or promise as such that may compromise the principles of fair competition or constitute an attempt to obtain or retain business for or with, or direct business to, any person.; to influence the course of the business or government decision-making process.

- G. NORRESLET, SL is committed to maintaining the highest standards of financial integrity for the benefit of all our stakeholders. To do this, it will comply with the generally accepted accounting principles in the country where it operates. All accounting records, and reports produced from those records, must be maintained and filed in accordance with the laws of each applicable jurisdiction. Any request for public aid or subsidies and their management, if they are granted, will scrupulously comply with the established legal requirements. NORRESLET, SL will act in accordance with national legislation regarding the audit or supervision of its financial accounts.
- H. All NORRESLET, S.L. staff You must avoid situations of conflicts of interest. This will be applicable in all relationships that we maintain with Clients, Suppliers or with any other third party that has a relationship with the company. In cases where any conflict of interest situation may arise, it must be immediately communicated to management.

In relation to human rights, child labor and forced labor.

- I. It is the responsibility of NORRESLET, SL to pursue its improvement of corporate value through sound business practices. Our business activities have a direct and indirect impact on the societies in which we operate and therefore good business practice requires that business decisions take due account of the human rights and interests of its stakeholders, including shareholders, customers, employees, suppliers, business partners, local communities of the places in which we operate or have influence directly or indirectly through our suppliers.
- J. All activities developed by NORRESLET, S.L. They will always comply with respect for the fundamental rights included in the Universal Declaration of Human Rights, as well as all the principles related to the rights established in the Declaration of the International Labor Organization and the Fundamental Principles and Rights at Work.
- K. NORRESLET, SL will not tolerate child labor or forced or involuntary labor, neither in the development of its activity nor by any of its suppliers. Knowledge that any of your

business partners support these practices directly or by establishing business relationships with those who do so will result in the interruption of any business transaction.

- L. NORRESLET, SL. will disseminate its commitment to human rights throughout its entire value chain. Likewise, NORRESLET, SL undertakes to disseminate this policy to suppliers, contractors, collaborating companies and clients, promoting and encouraging the various components of the value chain to develop their own policy in this regard, and if they do not have it, they subscribe. that of NORRESLET, SL

In relation to labor rights and conditions and health and safety.

- M. At NORRESLET, S.L. Compliance with applicable national and, where applicable, international laws/regulations with respect to employment and work is required at all times, and we further encourage ethical and responsible behaviour towards any worker that is based on the following principles:
- a. All employees or contractors who carry out their activity at the facilities of NORRESLET, SL will be treated with equality, respect and dignity.
 - b. NORRESLET, SL will not interfere with the right of people to observe principles or practices based on caste, race, national origin, gender, religion, disability, union membership or political affiliation.
 - c. NORRESLET, S.L. will have and maintain an Occupational Risk Prevention System that guarantees the safety and respect for the physical integrity of any person who accesses its facilities or carries out activities outside of them for the company. To this end, it will provide training and the necessary resources in terms of safety and health at work, and will require Suppliers and third parties to comply with the regulations relating to Occupational Risk Prevention, identifying, through evaluations of business partners, irresponsible practices. that may lead to the cessation of commercial collaboration.
 - d. Any adverse impact on people's safety and health originating from our business processes will be identified and eliminated through the reformulation of work practices, the use of protections, staff training, health control, and whenever necessary. possible, the replacement of harmful products with less harmful ones. To this end, we will systematically review our operations to identify sources of health and safety risks.
 - e. NORRESLET, S.L. is committed to promoting measures that promote a work environment compatible with personal development, helping whenever the activity allows it, to reconcile in the best way the demands of each job with the particular circumstances of each worker to meet their personal obligations. and/or family.
 - f. NORRESLET, SL rejects any form of sexually coercive, threatening, abusive or exploitative behaviour.

- g. Any reported incident related to physical, sexual, racial, religious, psychological, verbal harassment or abuse or any other form of direct or indirect vexation, harassment or abuse, or any other form of intimidation or degrading treatment will not be tolerated by NORRESLET, SL .
- h. NORRESLET, SL will not require workers to work more than the national limit of hours in a week on a regular basis, and overtime hours will not exceed the national limit allowed per week on a regular basis, unless there are legal exclusions.
- i. NORRESLET, SL will ensure that wages and benefits for a standard working week meet at least national minimum standards and are sufficient to meet workers' basic needs and provide some discretionary income.
- j. NORRESLET, SL will ensure that wages are paid to employees on a regular and predetermined basis in a convenient manner and location, accompanied by a pay stub detailing wage rates, benefits and deductions, as applicable.
- k. When necessary, NORRESLET, SL will duly recognize the existence, affiliation and legitimate activities of workers' representative bodies, and access will be given to worker representatives to carry out their responsibilities/functions.
- l. NORRESLET, SL will not tolerate at any time discrimination related to the hiring, firing, payment, promotion and training of employees, the use of corporal punishment or other forms of mental or physical coercion.
- m. NORRESLET, SL encourages all personnel to express concerns promptly, if they have genuine reason to believe that a policy, operation or practice of the entity is or is likely to violate any law, regulation or internal rule or policy of the entity, including these Business Principles. NORRESLET, SL assures all employees who come forward in good faith to report problems, that they will be treated fairly and respectfully. While every effort will be made to protect the anonymity of employees to the extent possible, any form of retaliation against such individuals will not be tolerated, assuming they were not involved in the violation.

In relation to our products, the raw materials we use, their origin and our way of disseminating it.

- N. NORRESLET, SL undertakes to carry out a due diligence on all its suppliers of raw materials, which allows it to know the origin of the materials it uses, so that it will reject their purchase in those cases in which it may contribute to financing conflicts, supporting work child, human rights abuses, bad mining practices and other environmental risks.
- O. NORRESLET, SL only uses metal from responsible suppliers that comply with human rights and the strictest safety measures and that also have certifications that accredit their ethical and sustainable origin.
- P. The diamonds distributed by NORRESLET, SL come from legitimate sources not involved in the financing of armed conflicts and comply with United Nations resolutions, the Kimberley Process Certification Scheme and/or the Declaration of the Guarantee System of the World Diamond Council (WDC).

- Q. NORRESLET, SL will ensure at all times that the information disclosed to any business partner is complete and truthful, specifying for each item the raw materials used in its manufacture regardless of whether the information is specifically requested or not and regardless of the value of the item being sold.
- R. No misuse will be made through illustrations, descriptions, expressions, words, figures, representations or symbols that attempt to differentiate the product in sale, advertising and distribution in a confusing or misleading manner.
- S. Both verbal information before and during the sale, and written disclosure on each sales invoice, receipt, laboratory certificate or other documentation related to the sale, must be made in the applicable local language or in English as the universal language. Where applicable, the following affirmative statement recommended by the World Federation of Diamond Exchanges should be printed on all invoices.

In relation to environmental performance:

- T. NORRESLET, SL is committed to effective environmental management. To do this, it assumes the following commitments:

- Compliance with all applicable environmental laws and regulations.
- Analysis and evaluation of the real and potential impacts that may be generated in each and every one of the activities carried out by the company, adopting measures against situations that allow the mitigation or elimination of the identified impacts.
- Improving environmental awareness and performance of employees, business partners and other stakeholders through the promotion of good environmental practices and internal awareness and training activities.
- Efficient use of natural resources to minimize waste generation through efforts that include recycling, innovation and pollution prevention.
- Integration of environmental responsibilities and considerations into daily operations and business decision-making processes.
- Commitment to a process of continuous improvement in environmental management.

In relation to community development

- NORRESLET, SL is committed to the development of the communities where it operates, contributing to their social and economic well-being, respecting the environment in all our activities and opting for local growth, supporting and promoting initiatives focused on improving the quality of life of the communities. where we operate, through awareness-raising actions, and/or sponsorship and/or patronage or other forms of collaboration.

All employees must endeavor to conduct the business of NORRESLET, SL accordingly when making business decisions, employees must act in an informed manner, in good faith and in the honest belief that the action taken is in the best interests of NORRESLET, SL

NORRESLET, SL has implemented programs that monitor the effectiveness of these commitments and, therefore, support all workers in this effort.

To maintain and improve customer trust and the reputation of the diamond and jewelry industry, NORRESLET, SL is fully committed to ensuring that all business processes and transactions are carried out in a professional, ethical, environmentally friendly manner. environmentally and socially responsible.

NORRESLET, SL will strive to obtain a similar commitment from its commercial partners.

SUPPLIERS AND CUSTOMERS POLICY

NORRESLET, S.L, as a certified member of the Responsible Jewelry Council (RJC), undertakes not to establish any contractual relationship with clients, suppliers, contractors and business partners that do not comply with these points:

1. Respect for Human Rights in accordance with the Universal Declaration of Human Rights and the Declaration on Fundamental Principles and Rights at Work of the International Labor Organization.
2. Bribery, corruption, money laundering or terrorist financing will not be tolerated.
3. Support for the transparency of payments to the government and security forces that are compatible with rights in the extractive industry.
4. Direct or indirect support for illegal armed groups will not be allowed.
5. Stakeholders will be allowed to express their concerns about the jewelry supply chain.
6. We are implementing the OECD five-step framework as a process to manage risk-based due diligence for responsible supply chains of minerals from conflict-affected and high-risk areas (CAHRA).
7. Regarding serious abuses associated with the extraction, transport or trade of gold or minerals, we will not tolerate, benefit from, contribute to, assist or facilitate in any way the commission of:
 - a) torture, cruel, inhuman and degrading treatment;
 - b) forced or compulsory labor;
 - c) any form of child labor;
 - d) human rights violations and abuses; either
 - e) war crimes, violations of international humanitarian law, crimes against humanity or genocide.

NORRESLET, S.L. will immediately stop collaborating with suppliers if it considers that there is a reasonable risk that they will commit the abuses described in the previous list or any action that NORRESLET, S.L. unilaterally considers that it violates or may violate the applicable legislation, national or international, regarding Human Rights, or that they obtain supplies from any third party that commits such abuses or are linked to it

8. Regarding direct or indirect support to non-state armed groups, we will not tolerate the provision of direct or indirect support to non-state armed groups, including, among other things, the acquisition of gold or minerals, making payments, or otherwise assisting or equipping non-state armed groups or their affiliates that illegally:
 - a) Monitor mining sites, transport routes, points where gold or minerals are traded and upstream actors in the supply chain; either

- b) illegally tax or extort money, or gold at mining sites, along transportation routes or at points where gold and minerals are traded, or from middlemen, export companies or international traders.
9. Regarding public or private security forces, the function of said security forces is to provide security to workers or Collaborators, facilities, equipment and property in accordance with the rule of law, including legislation that guarantees human rights. NORRESLET, S.L. will not provide direct or indirect support to public or private security forces that commit the abuses described in this paragraph or that act illegally.
10. Regarding bribery and false declaration of the origin of gold or minerals: We will not offer, promise, give or demand bribes, and we will resist soliciting bribes, to hide or conceal the origin of minerals, or to falsely declare the origin of gold or minerals. taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transportation and export of gold or minerals.
11. Regarding money laundering, we will support and contribute to efforts to eliminate money laundering where we identify a reasonable risk arising from the extraction, trade, handling, transport or export of gold, minerals or related to them.

NORRESLET, S.L. will immediately stop collaborating with suppliers if it considers that there is a reasonable risk that they supply or are related to any third party that provides direct or indirect support to non-state armed groups, as described in this clause, or any action that NORRESLET, S.L. unilaterally considers that it violates or may violate the applicable legislation, national or international, regarding Financing of Terrorism or Armed Groups.

Prior to signing the contract or placing any order, NORRESLET, S.L. a risk analysis that allows evaluating its suitability for the interests of the company. Said risk analysis will be materialized through a questionnaire (KYC) that will evaluate the suitability of the Supplier or Client and compliance with the requirements established by NORRESLET, S.L. for the hiring of third parties.

For the approval of any supplier or client, acceptance of the Policy will be an essential requirement.

With the above, the hiring process of NORRESLET, S.L. It is made up of the following activities:

1. Identify existing relevant business partners, prioritizing raw material and production suppliers and major customers or large account clients.
2. Send the BUSINESS PARTNERS EVALUATION questionnaire to all existing business partners. DUE DILIGENCE – KYC, which includes the Corporate Responsibility Policy by reference to its website through which it communicates its expectations regarding commercial practices to all its business partners. The Business Partner Evaluation - Due Diligence - KYC questionnaire is based on the guidelines offered by RJC.
3. Once the complete KYC questionnaire has been received and it has been verified that the business partner complies with the standards established in our policy, it verifies the compliance and alignment of its practices with the Corporate Responsibility Policy, in which case the supplier / client becomes approved by NORRESLET, S.L.
4. All NORRESLET suppliers/clients adhere to our Corporate Responsibility Policy, incorporated on the website, in contracts and order sheets for suppliers by accepting the work. In the event that the Third Party has its own Code of Ethics, it may be sent to NORRESLET, S.L. for your acceptance or requirement to adhere to our Corporate Responsibility Policy. Failure to comply with any of these rules must allow the termination of the contract, a circumstance that will be specifically stated in the document signed with the third company.

Both NORRESLET, S.L. such as Suppliers and Clients, will avoid, to the extent possible, carrying out transactions, directly or indirectly, with any country considered a Tax Haven, Risk Countries and Countries with significant corruption rates according to Transparency International. The three lists are attached as an annex to this policy for information purposes, with the lists published by the corresponding Organizations being applicable in any case.

In the event that Suppliers and/or Clients are forced to work with third parties residing in said countries, they must justify said decision to NORRESLET, S.L. This being empowered to, at any time, terminate the commercial relationship with said third party.

ANNEX 1- LIST OF TAX HAVENS

According to the report dated December 23, 2014 prepared by the General Directorate of Taxes of the State Secretariat of Finance, dependent on the Ministry of Finance and Public Administrations, the current list of tax havens approved by Royal Decree 1080/1991, of July 5, with the exclusions derived from the application of the modification introduced by Royal Decree 116/2003, of January 31, is made up of 33 countries:

1. Emirato del Estado de Bahrein.	12. Islas de Guernesey y de Jersey (Islas del Canal).	23. República de Vanuatu.
2. Sultanato de Brunei.	13. Islas Malvinas.	24. Islas Vírgenes Británicas.
3. Gibraltar.	14. Isla de Man.	25. Islas Vírgenes de Estados Unidos de América.
4. Anguilla.	15. Islas Marianas.	26. Reino Hachemita de Jordania.
5. Antigua y Barbuda.	16. Mauricio.	27. República Libanesa.
6. Bermuda.	17. Monserrat	28. República de Liberia.
7. Islas Caimanes.	18. República de Naurú	29. Principado de Liechtenstein.
8. Islas Cook.	19. Islas Salomón.	30. Macao.
9. República de Dominica.	20. San Vicente y las Granadinas.	31. Principado de Mónaco.
10. Granada.	21. Santa Lucia.	32. Sultanato de Omán.
11. Fiji.	22. Islas Turks y Caicos.	33. República de Seychelles.

ANNEX 2- LIST OF CAHRA COUNTRIES

<https://www.cahraslist.net/>

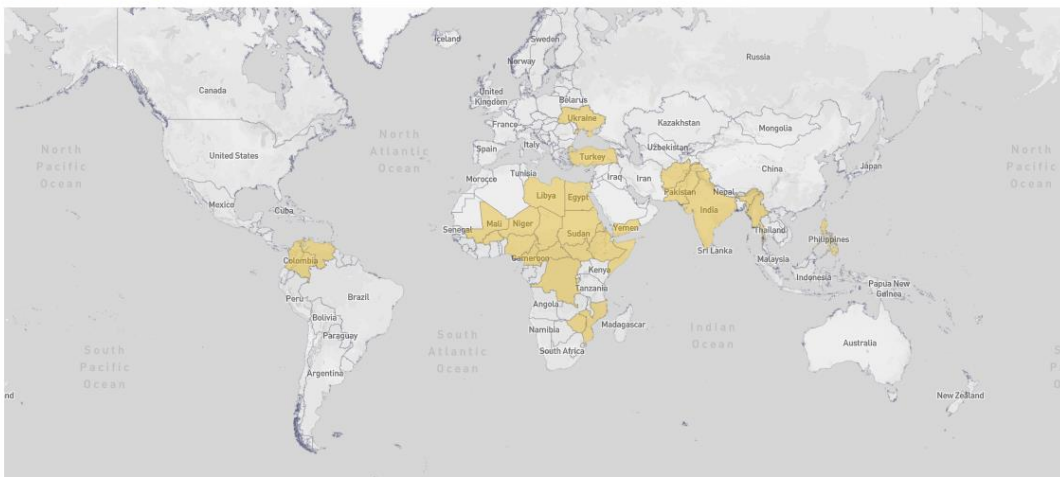


CAHRAs

METHODOLOGY

ABOUT

GLOBAL MAP



The boundaries, names and designations on this website's maps do not imply endorsement or acceptance by RAND Europe or the European Commission.

ANNEX 3- LIST OF COUNTRIES WITH A SIGNIFICANT CORRUPTION INDEX ACCORDING TO TRANSPARENCY INTERNATIONAL

1. Guyana	18. Zimbabwe	35. Rusia
2. República Centroafricana	19. Madagascar	36. Uzbekistán
3. Mauritania	20. Burundi	37. Comoros
4. Paraguay	21. Nicaragua	38. Turkmenistán
5. Azerbaiyán	22. Angola	39. Uganda
6. República del Congo	23. Timor-Leste	40. Iraq
7. Gambia	24. Guinea-Bissau	41. Ucrania
8. Tayikistán	25. Camerún	42. Bangladesh
9. Honduras	26. Haití	43. Afghanistan
10. Chad	27. Irán	44. Guinea
11. Kazakstán	28. Venezuela	45. Sudan
12. República Democrática del Congo	29. Kyrgyzstán	46. Kenia
13. Nepal	30. Yemen	47. Corea del Norte
14. Camboya	31. Líbano	48. Laos
15. Pakistán	32. Eritrea	49. Somalia
16. Myanmar	33. Nigeria	50. Papua
17. Togo	34. Libia	51. Nueva Guinea