

Responsible Business Practices Policy Commitments

Fremada Gold

Responsible Jewellery Council (RJC) policy

Fremada Gold is a member of the Responsible Jewellery Council (RJC).

The RJC is a standards-setting organisation established to advance responsible ethical, human rights, social and environmental practices throughout the gold, silver, platinum group metals, diamond and coloured gemstone jewellery supply chain.

The RJC has developed a benchmark standard for the jewellery supply chain and credible mechanisms for verifying responsible business practices through third-party auditing.

As an RJC member we commit to operating our business in accordance with the RJC Code of Practices Standard. We commit to integrating ethical, human rights, social and environmental considerations into our day-to-day operations, business planning activities and decision-making processes.

Human and Labour Rights

We are committed to respecting all human rights in our own operations and business relationships in accordance with the [Universal Declaration of Human Rights \(UDHR\)](#), the [UN Guiding Principles on Business and Human Rights](#) and relevant conventions of the [International Labour Organization \(ILO\)](#). Our human rights policy covers the following key commitments:

- All forms of violence and harassment in the workplace are prohibited, including but not limited to corporal punishment; harsh or degrading treatment; sexual or physical harassment; mental, physical, verbal or sexual abuse; retaliation; coercion; and intimidation. Both direct and indirect harassment in any form is not acceptable in workplace facilities.
- To never engage in or knowingly support child labour (including the worst forms of child labour) as defined by International Labour Organisation (ILO) conventions 138 and 182;
- To never engage in or knowingly support forced labour as defined by International Labour Organisation (ILO) convention 29, including bonded labour, deceptive recruitment, human trafficking and indentured or involuntary prison labour;
- To provide a safe and healthy working environment for employees and on-site contractors;
- To prohibit all forms of discrimination, including but not limited to discrimination based on race, colour, ethnicity, caste, national origin, religion, disability or genetic information, gender, sexual orientation, union membership, political affiliation, marital status, parental or pregnancy status, physical appearance, HIV status, age or any other personal characteristic unrelated to the inherent requirements of the work.
- To promote human rights in our dealings with business partners and other relevant stakeholders.

Bribery and Corruption

We prohibit bribery and corruption in all business practices and transactions carried out by us and by agents acting on our behalf. For the purpose of this policy, bribery is defined as giving, offering or receiving any undue advantage to or from:

- A public or government official;
- A political candidate, party or official; or
- Any private sector employees, directors or officers, or their agents or representatives.

Anti-Money Laundering and Finance of Terrorism

We commit to not engaging in or contributing to money laundering or the finance of terrorism. Fremada Gold has implemented Anti-Money Laundering (AML) and Know Your Counterparty (KYC) procedures to:

- a. Establish the identify of all counterparties;
- b. Verify that counterparties and, if applicable, beneficial owners are not named on relevant government lists for individuals or organisations implicated in money laundering, fraud or involvement with prohibited organisations and/or those financing conflict;
- c. Maintain an understanding of the nature and legitimacy of the businesses operated by counterparties and;
- d. Monitor transactions for unusual or suspicious activity.

Environmental Management

We commit to reducing and managing the environmental impacts of our business operations, which includes:

- The responsible management of all wastes and emissions to air, water and land.
- Establishing energy and water efficiency measures.
- Seeking to ensure the responsible and efficient use of other natural resources, where applicable.

Product Disclosure

We will not knowingly make any untruthful, misleading or deceptive representation, or make any material omission in the selling, advertising or marketing of jewellery products and materials. We further commit to disclosing information on the physical characteristics of jewellery products and materials in accordance with the Responsible Jewellery Council (RJC) Code of Practices Standard.

Signet Responsible Sourcing Protocol (SRSP)

As a supplier to Signet Jewelers, we commit to complying with the Signet Responsible Sourcing Protocol (SRSP) and require that all of our suppliers do the same. We carry out due diligence on all of our suppliers to verify that their sourcing practices align with the SRSP criteria for responsibly sourced precious metal.

Grievance procedure

Fremada Gold has established this procedure to hear any concerns or complaints from interested parties and stakeholders regarding its supply chain and business practices.

Concerns can be raised by interested parties via email using info@fremada.com

On receiving a complaint, we will aim to:

- contact you as soon as possible to gather more information regarding your grievance, where applicable;
- decide who is the appropriate person internally to handle the grievance, or help redirect you to another entity, such as a relevant company, industry body or other organisation;
- identify any actions we should take (if any), or monitor the situation;
- advise you of any decisions or outcomes; and;
- keep records on grievances received and the internal process followed to address such grievances, for at least five years.