



SUSTAINABILITY

Code Of Conduct

Incorporating our social, ethical
and environmental policy

FILK SPA

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Mission

FILK S.p.A. is a company that has been operating in the goldsmith manufacturing sector since 1974, producing a wide range of gold chains distributing in over 50 countries around the world.

The mission of our company is to offer high quality products at competitive prices to consumers and customers, to meet their needs and maintain their trust over time, so as to ensure long-term profitable growth for the Company.

This basic vision cannot be separated from compliance with the laws and international standards in force and is based on the talent of the people who make up the company and on the sharing of strong values, such as:

- **Entrepreneurship**
- **Passion for excellence**
- **Responsibility**
- **Honesty and integrity**



Equally important is the sustainable and respectful development of natural resources, their careful use and the elimination of waste.

This Code of Ethics expresses the founding principles and provides a guide to the activities of FILK S.p.A. (the “Company”).

Introduction

Ethical Code

This Code of Ethics (the “Code”) summarizes the principles of conduct that administrators, directors, managers, employees and collaborators in any capacity, as well as the suppliers of the Company, must comply with in conducting business activities, in carrying out the performance of work and, in general, in internal and external relations with the Company. It does not claim to be exhaustive.

Stakeholders

The Code must be respected by administrators, directors, managers, employees and collaborators, as well as the suppliers of the Company. The violation of this Code is considered a non-fulfillment of the contractual conditions with all consequences foreseen by the law.

Business Principles

Responsibility Towards Stakeholders

The Company is fully aware of the responsibility to give an account of the actions taken towards the subjects who have a controlling interest in the Company,

This responsibility is guaranteed by the adoption of internal organizational procedures that correctly identify decision-making responsibilities.

Transparency

The Company is fully aware of the need to disclose the content relating to policies, decisions and activities undertaken, including assessments of the impact on society and the environment.

Ethical Behavior

The Company bases its activities on the assumption of the concepts of honesty, fairness and integrity, considering them fundamental elements to guarantee ethical behavior.



Respect For The Interests Of Stakeholders

The Company identifies its internal stakeholders (directors, managers and employees of the Company) and external stakeholders (customers, suppliers, institutions and governmental organizations, business associations, trade unions and other social actors) and undertakes to respect their directly or indirectly related interests the activities undertaken, as well as carefully considering requests and proposals made by them.

Respect For The Principle Of Legality

The Company firmly believes that compliance with the laws in force is primary and supreme; in this context, it is clear that this respect must include not only the regulations in force on the national territory, but also those in force in the countries to which the Company exports its production.

Compliance With International Rules Of Conduct

The Company pays particular attention to the international rules of conduct in the event that they are more restrictive or reinforcing than the national regulations in force, both in relation to its activities and those related to other organizations.

Respect For Human Rights

Respect for the inviolable rights of man is essential. The Company promotes and defends these rights in all circumstances and rejects any discrimination based on gender, ethnicity, language, religious and political beliefs and social and personal conditions. The Company adopts the principles set out in the Universal Declaration of Human Rights, the UN Convention on the Rights of the Child and the International Labor Organization.

Company Governance

The above-mentioned principles of social responsibility are clearly and completely guaranteed from the Company governance management system. This system is based on the effective standard operating procedures adopted from the Company and the main components of the system are the organizational chart and the responsibilities assignment statement.

Human Rights

The Company is strongly committed to protect and guarantee the basic human rights like the right to life and personal liberty, right to equality before the law and freedom of expression. In addition to these civil and political rights are the economic, social and cultural rights, like the right to work, food, health and safety, education and social security.



The Company rejects every discrimination related to gender, ethnicity, spoken language, confession of faith, political creed, social and personal status.

The Company is committed to guarantee equality of opportunity during the job recruitment and hiring process, for every agreement stipulation, in relationship to professional growth, promotion and compensation practices, working conditions and every further opportunity.

Referring to the Modern Slavery Act issued in 2015, the Company deems it inadmissible and unacceptable any form of slavery, servitude and forced or constrained labor, as well as any form of trafficking in human beings. The Company assesses the risk of such situations to be null in its internal organizational framework and low along its industrial supply chain, by virtue of the characteristics of the suppliers and their geographical location. Given this, the Company deems as necessary to carefully check with continuity or at least on a periodic basis any variation of the general and specific conditions that may herald a potential situation of violation of the aforementioned principle, also based on the reports and complaints from international organizations and institutional bodies in charge. The Company is committed to acting ethically and with integrity in every business relationship

and to implement and apply effective systems and controls to ensure that modern slavery does not occur in any of its internal or external activities.

The Company believes in education as a fundamental right as well as an indispensable universal educational principle and collaborates with schools and other educational institutes and agencies in order to promote the growth and responsible training of young people.



Employment Policy

The Company is committed to adopt and fully comply with the legislation that regulates working relationships and conditions, regarding the recruitment and promotion of workers, the management of disciplinary procedures and disputes, the transfer and relocation of workers, termination of the employment relationship, training and development of skills, health, safety and industrial hygiene. Particular attention is paid to working hours and the organization of operations.

Each employee and collaborator of the Company must be involved in the pursuit of business objectives and in solving problems on the basis of their respective skills and responsibilities.

The Company is committed to ensuring a respectful and stimulating work environment, equipped with effective and efficient operational and management tools.

Company employees and collaborators are given full power to organize themselves into representative associations in compliance with the provisions of current regulations.

Employees and collaborators are guaranteed to be able to report any violation of the regulations or any situation deemed potentially or actually harmful to personal rights in a confidential and transparent manner and without fear of retaliation.

Environment

The Company complies with current regulations on environmental pollution, management of energy resources and environmental impact assessment of activities. In order to reduce waste, the Company is committed in order to carefully evaluate materials and methods to be used both for the manufacture of the product and for all other related and inherent activities, such as storage and shipping, general services, use and maintenance of production plants and equipment, the use of various types of consumables.

The Company is engaged in the separate collection of waste for recycling and monitors the quotas produced and transferred in order to achieve a progressive reduction.



Proper Management Practice

The Company's administrative approach is based on the absolute guarantee of financial integrity and transparency and does not allow any type of fraudulent transaction. For this reason, each transaction must be verified and authorized by the identified managers.

The Company rejects corruption as a tool for conducting its business. No member or representative of the Company must attempt to bribe both holders of elected public offices, public officials or persons in charge of public service and private individuals, both in relation to services related to the business activity, and in a personal capacity. No member or representative of the Company must accept donations or undue services, both in relation to services related to the business activity, or in a personal capacity. In the context of this vision, the Company admits the giving and acceptance of gifts, provided that their economic value and their quantity are absolutely irrelevant.

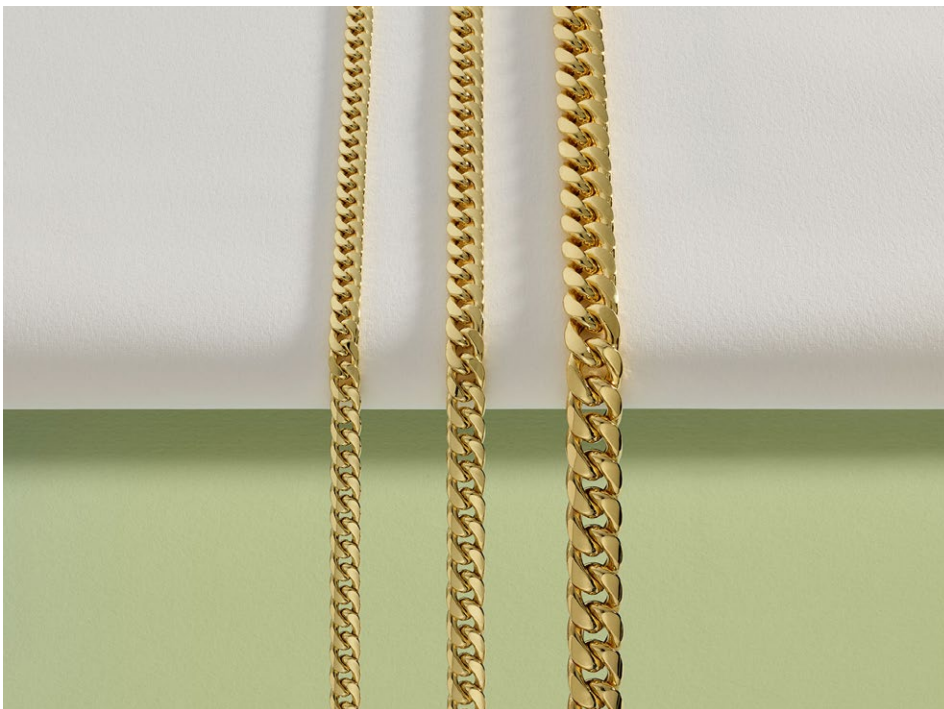
The Company protects the intellectual property, respecting and protecting the contents of all forms of intellectual property, both its own and that of others.



The Company considers fair competition a fundamental element for guaranteeing a free market and for the development of business activities.

The Company promptly urges its employees and collaborators to report any economic relationships external to the professional activity, in order to verify that there is no incompatibility with the obligations undertaken towards the Company itself. Employees and collaborators, for their part, must avoid undertaking investments or business relationships that may constitute a conflict of interest in relation to their responsibilities within the Company organization.

The Company selects its suppliers based on multiple criteria including the technical suitability of the services or products offered, the level of assistance, the reliability of the service, compliance with contractual terms, economic convenience. Furthermore, suppliers are required to accept the following code of ethics and adhere to the principles of social responsibility mentioned above.



Customers Approach



Although the Company does not deal with direct retail sales, the correct, transparent and available approach and the evaluation of customer satisfaction are considered fundamental and should be pursued in collaboration with intermediary organizations, which are the actual customers of the Company.

Attention is paid, in particular, to aspects relating to product safety, in this regard the Company reserves the right to adopt more restrictive voluntary standards in the event that the regulations in force are not considered sufficiently effective in protecting the final consumer.

The Company undertakes to carry out only fair marketing, based on correct, verified and relevant information.

The Company guarantees the correct storage of customer-specific data and information and undertakes not to disclose them and to make proper use of them, in compliance with the regulations in force and the will expressed by the customer at the time of making the aforementioned data available.

The Company has developed and activated a procedure for the withdrawal and recall of non-compliant products, clearly identifying the health risks, even if only potential, that may arise from the detected non-compliance.

Community Involvement And Development

The Company focuses its attention primarily on the civil community of the urban area where the manufacturing plants are based and considers the employment and search for personnel as a primary tool for collective growth and guarantee of the right to employment. Attention is also paid to the impact of plants and activities on local communities, with particular sensitivity to observations and reports from both institutional bodies and individual members of the communities.

The Company hopes and promotes collaboration with institutions and the commitment of social promotion associations and forms of voluntary work and is available to grant its patronage to initiatives whose primary purpose is to strengthen the civil and democratic values of our society.



Code Of Conduct Guarantors

As guarantors of this code, the Directors undertake to verify its complete implementation, to acknowledge any report and observation on the merits of the contents and its application and to coordinate any revisions that may be necessary.

The Directors undertake to prepare appropriate communication channels with the Company's stakeholders in order to allow the complete implementation and extension of this Code.

The Directors undertake to communicate the contents of this code to all employees and collaborators of the Company, also through specific training initiatives.

FILK S.P.A.

CEO

Andrea Cremasco