

RJC Management System

Ethical and Social Responsibility Policy (in compliance with the RJC Code of Practices) of Coscia S.r.l.

This policy constitutes the consolidated ethical and behavioural reference document for Coscia S.r.l. and is compliant with the requirements of the Responsible Jewellery Council (COP 2019).

Revision History

Revision	Date	Changes	Approval
1.0	26 May 2025	Initial Version of Coscia SRL	Giancarlo Coscia

Reference Documents:

- RJC Code of Practices (current version)
- Kimberley Process Certification Scheme
- World Diamond Council – System of Warranties
- UN Guiding Principles on Business and Human Rights
- OECD Due-Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
- ILO Core Conventions on Fundamental Principles and Rights at Work
- ISO 14001:2015 Environmental-management systems
- ISO 45001:2018 Occupational health and safety management systems
- SA8000® Standard
- GRI Standards
- UN 2030 Agenda for Sustainable Development and its SDGs
- Regulation (EU) 2017/821 (EU Conflict-Minerals Regulation)
- Italian Legislative Decree 13 / 2 February 2021
- CIBJO Responsible Sourcing, Diamond, Pearl, Precious Metals, Gemstone and Coral Blue Books
- ISO 18323 “Jewellery – Consumer confidence in the diamond industry”
- All applicable national and international laws and regulations

1. Introduction and Programmatic Policy

Coscia SRL embodies a family passion born more than 100 years ago, continually renewed in the creation of elegant and refined jewellery, with a particular specialisation in pearls. Founded in 1919 by Vincenzo Coscia in Torre del Greco, the company has developed a solid reputation in trading the finest qualities of cultured pearls, including Australian, Tahitian and Japanese. This heritage has been strengthened and brought into the present by Giancarlo Coscia, who has enhanced Italian craftsmanship and innovated the language of classical jewellery.

“Ingenuity, dedication and passion characterise Coscia style worldwide.”

With operational headquarters at the “Il Tari” business centre in Marcianise (CE) and historic workshops in Torre del Greco (NA), Coscia SRL combines tradition, experience and innovation in design and manufacturing. The company is proud of its long collaboration with the Japan Pearl Exporters’ Association (JPEA) and of its membership in Assocoral. Coscia jewels, also sold under the COSCIA & LELUNE brand, embody high quality standards and a recognizable identity.

As a member of the Responsible Jewellery Council (RJC), Coscia SRL undertakes to adopt the principles of the Code of Practices (COP 2019), integrating ethical, social, environmental and human-rights considerations into all business activities. This commitment goes beyond compliance: it embraces a vision of sustainability inspired by the UN 2030 Agenda and its 17 Sustainable Development Goals (SDGs), already fully consistent with several COP requirements.

Coscia SRL recognises and promotes the connection between its activities and relevant SDGs such as: SDG 8 (Decent work and economic growth), SDG 12 (Responsible consumption and production), SDG 5 (Gender equality), SDG 13 (Climate action), SDG 3 (Good health and well-being), SDG 16 (Peace, justice and strong institutions). These goals are progressively integrated into the company’s strategies, policies and organisational culture.

The path adopted by Coscia SRL follows the stages indicated in the RJC guide on integrating SDGs:

- Understanding the SDGs and the role of business;
- Mapping existing activities against the 17 goals;
- Setting priorities and defining measurable objectives;
- Integrating the SDGs into internal processes, policies and strategic statements;
- Engaging stakeholders and strengthening partnerships;
- Using corporate tools for effective impact management.

Coscia SRL considers this Programmatic Policy not only a formal commitment tool but a statement of identity and future vision. Responsibility for its application and the monitoring of progress lies with the Management, represented by Giancarlo Coscia.

Coscia SRL carries out periodic checks to ensure that the principles set out in this policy are effectively respected. This responsibility falls under the supervision of Giancarlo Coscia, who monitors progress and addresses relevant issues. The selected SDGs reflect the current assessment of relevant impacts for the company and may be reviewed and modified periodically.

Scope of Application

This policy outlines the ethical-social principles and values that guide Coscia SRL. It is addressed to employees, shareholders, customers, suppliers, external collaborators, business partners and any other party acting on behalf of or in the name of Coscia SRL. Adherence to this policy is expected from all individuals and entities within our sphere of influence and our supply chain.

Coscia SRL undertakes to ensure effective, continuous and consistent communication both inside and outside the organisation. This policy will be shared with all employees through training sessions and digital communications, and made available on the company website. It will be transmitted to suppliers and business partners through official communications, and an acknowledgement of receipt will be required. Tools such as internal newsletters, company notice boards and shared platforms will also be used to ensure that the ethical principles are constantly visible and applied.

1. Human Rights and Social Responsibility Policy

In addition to complying with the laws applicable in all the countries in which it operates, Coscia SRL undertakes to identify, mitigate and, where possible, prevent potential human-rights violations linked to its activities. Coscia SRL commits to:

- Support the protection and promotion of human rights and fundamental freedoms as stated in the 1948 Universal Declaration of Human Rights and in subsequent international human-rights conventions.
- Acknowledge and respect the principles set out in the ILO Fundamental Conventions², in particular the right to freedom of association and collective bargaining, and the prohibition of forced and child labour, ensuring that all employment relationships conform to national laws and collective-bargaining agreements.
- Tolerate no form of workplace discrimination based on race, ethnicity, caste, nationality of origin, religion, disability, sex, sexual orientation, trade-union membership, political affiliation, marital status, pregnancy, physical appearance, age, HIV-positive status or any other ground prohibited by applicable labour and worker-rights legislation.
- Commit to refrain from corporal punishment and to prohibit degrading treatment, abuse, coercion and any form of intimidation.
- Exercise due diligence along our entire supply chain to ensure that we do not source materials from areas with armed conflict, widespread violence or other human-rights risks, as indicated by relevant international frameworks such as the EU Conflict Minerals Regulation and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Although our main focus is on pearls, this commitment applies to all the materials we source.

Coscia SRL also undertakes to support the development of the communities in which it operates, with the aim of contributing to the economic and social well-being of the area. The company promotes³ charitable and solidarity initiatives and contributes to projects that support the community's artistic and cultural heritage.

2. Ethical Business Conduct, Anti-Corruption, Anti-Extortion and Anti-Money-Laundering Policy

Coscia SRL undertakes to carry out and conduct its business with the highest ethical standards, ensuring integrity, transparency and compliance with applicable laws. To this end, the company commits to:

- Not engage in or tolerate bribery, corruption or extortion and to contribute to combating these illicit practices.
- Not accept payments, gifts, discounts, advantages, promises and/or other benefits that could be interpreted as exceeding normal business or courtesy practices and that might influence independence of judgment or induce anyone to secure an advantage or preferential treatment.
- Not carry out transactions and/or operations that could compromise the principles of fair competition or constitute an attempt to influence business or decision-making processes.
- Avoid conflicts of interest.
- Not tolerate money-laundering or the financing of terrorist activities.
- Apply adequate verification (Know Your Counterparty - KYC), taking into account the risk associated with each counterparty before starting any business relationship, closely monitoring our supply chain and exercising effective KYC practices.
- Fully and accurately declare the characteristics of the precious metals and pearls sold and ensure that the weight, functionality, finish and quality of our products comply with declared standards through systematic checks with effective state-of-the-art precision instruments.
- Adopt appropriate systems and measures to guarantee product integrity and security during shipments and to prevent theft, damage and substitution.
- Respect consumer rights by applying fair commercial, advertising and marketing practices and by taking the necessary measures to ensure the safety and quality of our products.
- Respect confidentiality and personal-data protection in accordance with applicable legislation (e.g. GDPR).

3. Environmental Policy

Coscia SRL recognises the importance of environmental protection and sustainable development as a fundamental value of our corporate ethics. We undertake to conduct our activities with full respect for the environment and in compliance with all applicable laws and regulations. We maintain an effective emergency plan to address any harmful environmental consequences arising from our operations.

Consequently, the company commits to manage the waste it produces responsibly and correctly, to use energy efficiently and to minimise the environmental impact of its activities. We will strive for continuous improvement in environmental performance.

4. Occupational Health, Safety and Hygiene Policy

Coscia SRL promotes the actions necessary to protect the safety and health of our employees and of all persons who come into contact with the company. To this end, we undertake to:

- Comply with the laws and regulations applicable to health, safety and hygiene in the workplace.
- Train and inform employees on procedures and risks relevant to health and safety.
- Establish and maintain a system for identifying and controlling health and safety risks for workers.

- Define and implement technical, organisational and managerial measures in order to prevent – where possible – and/or reduce the health and safety risks for workers in the workplace.
- Ensure and maintain the safety and well-being of employees, visitors, customers and suppliers within our facilities.

5. Security

Coscia SRL is committed to protecting its own industrial property and that of its customers. To this end, Coscia SRL has set up specific procedures to safeguard products against theft, damage or substitution within its premises and during shipments.

Coscia SRL also informs its employees of the importance and duty of respecting the confidentiality and industrial property belonging both to the company and to its business partners.

6. Responsible Sourcing and Due Diligence

Coscia SRL undertakes to exercise adequate due diligence along its entire supply chain to identify and mitigate risks, including those relating to sourcing from conflict-affected and high-risk areas (CAHRAs). Although our main focus is on sourcing pearls, we affirm our commitment to the responsible sourcing of all the materials we handle, including precious metals, diamonds and all coloured stones and biogenic materials.

We carry out adequate verification (Know Your Counterparty – KYC) on all our business partners (suppliers and customers) to obtain complete identification and adequate knowledge of the counterparty and any ultimate beneficial owner, aimed at preventing money-laundering and the financing of terrorism in our practices and commercial transactions.

6.1 Regarding serious abuses associated with the extraction, transport and trade of gold, diamonds and coloured stones (and applicable to all the materials we source):

Coscia SRL will not tolerate, benefit from, contribute to, assist with or facilitate the commission by any party of:

- a. torture, cruel, inhuman and degrading treatment;
- b. forced or compulsory labour;
- c. the worst forms of child labour;
- d. other gross human-rights violations and abuses;
- e. war crimes, violations of international humanitarian law, crimes against humanity or genocide.

Coscia SRL will therefore immediately terminate any engagement with upstream suppliers if it identifies a reasonable risk that they are involved with, source from or are linked to a counterparty that commits the abuses described in this paragraph.

6.2 Regarding direct or indirect support to non-state armed groups (applicable to all the materials we source):

Coscia SRL will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, sourcing gold, diamonds or coloured stones from, making payments to, or providing assistance or equipment to non-state armed groups or their affiliates that unlawfully:

a. control mining sites, transportation routes, trading points for gold, diamonds or coloured stones, or upstream actors in the supply chain; and/or

b. tax or extort money, gold or other minerals at mining sites, along transportation routes or at such trading points, or from intermediaries, export companies or international traders.

Coscia SRL will therefore immediately terminate any engagement with upstream suppliers if it identifies a reasonable risk that they source from, or are linked to, a counterparty that provides direct or indirect support to non-state armed groups as described in this paragraph.

6.3 Regarding public or private security forces:

We affirm that the role of public or private security forces is to ensure the security of workers, facilities, equipment and property in accordance with the law, including laws that protect human rights. We do not intend to provide direct or indirect support¹⁰ to public or private security forces that commit the abuses described in paragraph 6.1 or that act illegally as described in paragraph 6.2.

6.4 Regarding corruption or false statements about the origin of gold or minerals:

Coscia SRL does not intend to offer, promise or solicit bribes, and intends to oppose the solicitation of bribes, any request to conceal or disguise the origin of gold, diamonds or coloured stones, or to make false statements concerning taxes, duties, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of gold, diamonds or coloured stones.

6.5 With regard to money laundering:

Coscia SRL will support efforts and contribute to the elimination of money laundering if we identify a reasonable risk of money laundering originating from, or connected to, the extraction, trade, handling, transport, or export of gold, diamonds, or colored stones.

In support of this policy and related KYCP procedures, Coscia SRL has developed specific KYCP forms that we send to all our counterparties (business partners: suppliers and clients) to collect relevant business information and identify money laundering risks. Completion of the form is required for all counterparties, both new and existing.

7. Sustainable Development Goals (SDG's) and 2030 Agenda

Membership of the Responsible Jewellery Council demonstrates Coscia SRL's structural commitment to sustainable jewellery. Along this journey, we are guided by the principles of the UN 2030 Agenda with a focused and measurable approach.

Our SDG framework:

7.1 Sector priorities

We have identified three priority areas of action:

- o SDG 8: Protection of working conditions along the entire supply chain
- o SDG 12: Optimisation of resource use
- o SDG 16: Integrity in decision-making processes

7.2 Practical implementation

The actions include:

- o Risk-based supplier evaluation system
- o Waste reduction plans with progressive targets
- o Human rights and ethics training programmes

7.3 Dynamic management

Our SDG strategy shall be regularly reviewed to:

- o Align with regulatory developments
- o Incorporate best sector practices
- o Respond to stakeholder expectations

8. Review and update

Coscia SRL finally undertakes to:

- Comply with all applicable laws and regulations.
- Review this Policy annually (and extraordinarily whenever events make it necessary).
- Set measurable objectives for conformity with the RJC Code.
- Communicate those objectives to all interested parties.
- Take all necessary actions to identify and eliminate potential gaps between the planned policy and the business practices actually carried out.

9. Product Information and Representations (COP 28 & 29)

Coscia SRL undertakes to ensure that all information communicated about its products is truthful, transparent, traceable and compliant with applicable regulations. In particular:

- Terminology conforming to ISO 18323, the CIBJO Blue Books and the Diamond Terminology Guidelines will be used;
- Any misleading, ambiguous or omitted statement regarding the materials, treatments, quality and origin of the products will be avoided;
- Sales staff will receive specific training on legal obligations and international standards to guarantee the accuracy of the information provided to the end customer;
- Documentary verification of the information shown on labels, packaging and certificates will be ensured.

10. Integration of Ethical and Sustainability KPIs

Coscia SRL will introduce a system of key performance indicators (KPIs) to monitor and enhance the impact of its business activities in environmental, social and ethical terms.

The main KPIs considered include:

- Percentage of suppliers assessed annually for ethical and legal risk;
- Number of training hours delivered on ESG topics, human rights, AML and RJC;
- Number of reports received and handled through the ethics channel;
- Percentage of materials that are traceable or sourced from responsible origins;
- Reduction in the use of non-sustainable packaging materials.

Data will be collected quarterly and analysed during the annual policy review.

11. Publication

11.1 This policy will be:

- Explained to all employees in six-monthly meetings
- Explained to all stakeholders where necessary or upon request
- Made publicly available on the company website
- Shared with suppliers by 18 / 07 / 2025

11.2 The scope of application of this policy is extended, in addition to employees, shareholders, customers and direct suppliers, to all indirect stakeholders in the value chain, including subcontractors, agents, shippers, logistics providers and consultants. Coscia SRL undertakes to involve these actors in respecting its ethical values and the applicable international standards, by requiring:

- Formal adherence to the policy or to the company Code of Ethics;
- Completion of adequate-verification forms where necessary;
- Willingness to cooperate during supply-chain audit or verification phases.

Date: 05/26/2025

1. APPENDIX A.

GRIEVANCE MECHANISM

Coscia SRL has established a confidential communication channel to collect suggestions, feedback, and information, including in anonymous form, regarding ANY CIRCUMSTANCE IN THE SUPPLY CHAIN INVOLVING GOLD, SILVER, PLATINOIDS, DIAMONDS, PEARLS, AND COLORED STONES FROM CONFLICT-AFFECTED AREAS, as well as any concerns or information pertaining to risks or non-compliance related to HUMAN RIGHTS, CHILD LABOR, FORCED LABOR, HEALTH AND SAFETY, FREEDOM OF ASSOCIATION, DISCRIMINATION, DISCIPLINARY PROCEDURES, WORKING HOURS AND REMUNERATION, SUPPLIER OVERSIGHT, CORRUPTION AND FACILITATION PAYMENTS, MONEY LAUNDERING AND TERRORIST FINANCING, ENVIRONMENT AND ENVIRONMENTAL MANAGEMENT, and any other critical issues or risk situations for employees, customers, and the supply chain.

Reporting Methods: Interested parties may submit their concerns via:

- Dedicated form on the company website: www.coscia.it - Sustainability; www.lelunegioielli.it - Sustainability
- Phone number: +39 0823 513452 (Monday to Friday, 9:00 AM - 1:00 PM)
- Email address: segnalazioni@coscia.it
- Surface mail address: COSCIA SRL, Mod. 185, C/o "Il Tari", Marcianise (CE) - 80125, Italy

Employee Participation: Coscia SRL employees may submit reports and complaints internally to their supervisor, manager, or directly to the Human Resources department. They may also utilize the same REPORTING MECHANISM described above.

Ethical Commitment and Anti-Retaliation Policy: Coscia SRL is committed to fostering an ethical and transparent work environment where employees can report concerns, violations, or inappropriate conduct without fear of retaliation or negative consequences. This anti-retaliation policy aims to protect those who report in good faith, ensuring the confidentiality of reports and prohibiting any punitive action against them. This policy applies to all employees, regardless of their role, title, or position within the company.

Fundamental Principles of the Reporting Mechanism:

1. **Confidentiality Protection:** Reports will be treated confidentially and with discretion. Access to information will be limited to individuals involved in managing the report.
2. **Prohibition of Retaliation:** Any retaliatory or punitive action against those who make reports in good faith is prohibited, regardless of whether the report leads to evidence of violations.
3. **Right to Protection:** Individuals making reports in good faith will be protected from any form of discrimination, dismissal, penalization, or unfavorable treatment based on the report itself.
4. **Adequate Report Management:** Reports will be subject to a timely and accurate investigation. Individuals involved in the investigation will strive to ensure an appropriate and just resolution of the situation.
5. **Open Communication:** The company promotes a culture of open communication and encourages employees to express their concerns."