

Code of Practice-Responsible Jewelry Council Rubicon Co., Ltd. Guidelines

Rubicon was founded in 1987 by Mr. Jean Rene Eric Piat in one of the world's most famous cluster for gemstones with quality cutting craftsmen. He then took on the making of exceptional pieces for numerous of renowned jewelry brands. We recognize the importance of being a social responsible manufacturer and exporter. Therefore, we agreed to conduct the practice code that comply with the following Responsible Jewelry Council's compliance guidelines:

1. The executive will provide a system to demonstrate that it maintains awareness and ensures compliance with relevant laws and/or responsibilities in relation to the code of practices -Responsible Jewelry Council (COP-RJC) guidelines for society.
2. The company will prepare all the written policies that compliance with the requirement of Responsible Jewelry Council with endorsement by top management and implement all those practices among the policies that in this manual, as well as assignment of the responsible person for implementation on such policies.
3. Provide a management system for all those policies that have been announced as follows. This will have an identification and assessment of all risks in the implemented policies and establish due diligence procedures to ensure effective implementation of requirements. In this regard, communication is provided to employees. Additionally, stakeholders directly informed and published to the public.
4. The company has conducted a review to assess the appropriateness, adequate and sustainable of existing practices, and take steps to resolve any gaps to succeed in accordance with the policy. At least once a year.
5. Report the results of the above compliance by communicating to the public and directly to stakeholders on regular basis. At least once a year.

The above guidelines will be adopted in the operation accordance with the company's policies which was announced as follows:

Responsible Supply Chain Policy

1. This policy confirms Rubicon Co., Ltd.'s commitment to integrating ethical, respect human rights, and avoid contributing to the finance of conflict and comply with all relevant UN sanctions, resolutions, and laws.

2. Rubicon Co., Ltd is a certified member of the Responsible Jewelry Council (RJC). As an RJC member, we commit to operating our business in accordance with the RJC Code of Practices standard. We commit to proving, through independent third-party verification, that we;
 - a. Respect human rights in accordance with the Universal Declaration of human rights, the International Labor Organization Declaration on Fundamental Principles and Rights at work;
 - b. Prohibit bribery and corruption, money laundering or finance of terrorism.
 - c. Support transparency of government payments and rights-compatible security forces in the extractive industry.
 - d. Do not provide direct or indirect support to illegal armed groups
 - e. Enable stakeholders to voice concerns about the jewelry supply chain; and
 - f. Are implementing the OECD five-step framework as a management process for risk-based due diligence for responsible supply chains of minerals from conflict affected and high-risk areas.

3. We are committing to use our influence to prevent abuses by others. If we find that the supplier is at risk of non-compliance with such requirements. We will request the Supplier to take measurement to improve compliance with such requirements in a timely manner with the remedy all impact, and if still found to be at such a high risk level, we may suspend business transactions until there is an improve to the reduced the risk. We will consider the details contained in grievance mechanisms that we received from stakeholders who have raised concerns to us.

4. **Regarding serious abuses associated with the extraction, collection, manufacture, transport, and trade of precious metals:**

We will neither tolerate nor profit from, contribute to, assist, or facilitate the commission of:

 - a. Torture, cruel, inhumane, and degrading treatment
 - b. Forced or compulsory labor
 - c. The worst forms of child labor
 - d. Human rights violations and abuses; or
 - e. War crimes, violation of international humanitarian law, crime against humanity or genocide

5. We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are committing abuses described in paragraph 4 or are sourcing from, or linked to, any party committing these abuses.

6. **Regarding direct or indirect support to non-state armed groups:**

We only buy or sell diamonds that are fully complied with the Kimberly Process Certification Scheme. We will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring diamonds from, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates who illegally:

 - a. Control mine sites, transportation routes, points where diamonds are traded and upstream actors in the supply chain or

- b. Tax or extort money or diamonds at mine sites, along transportation routes or at points where gold and precious metals are collected, traded, or from intermediaries, export companies or international traders.
7. We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are sourcing from, or are linked to, any party providing direct or indirect support to non-state armed groups as described in paragraph 6.

8. Regarding public or private security forces:

We affirm that the role of public or private security forces is to provide security to workers, facilities, equipment and property in accordance with the rule of law, including law that guarantees human rights. We will not provide direct or indirect support to public or private security forces that commit abuses described in paragraph 4 or that act illegally as described in paragraph 6.

9. Regarding bribery and fraudulent misrepresentation of the origin of minerals and gold:

We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of precious metals, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, collection, trade, handling, transport, and export of precious metals.

10. Regarding money laundering:

We will support and contribute to efforts to eliminate money laundering where we identify a reasonable risk resulting from, or connected to, the extraction, trade, handling, transport or export of minerals and gold.

Human Rights Policy

1. The company will conduct its business with importance and respect to the law. Employees, executives must strictly comply with applicable laws.
2. The company will value and respect the human rights that are recognized internationally according to the laws, both in terms of basic guidelines and including rights in the workplace.
3. The company will not support and avoid human rights violations against others and will resolve any issues or impacts related human rights consequences.
4. The company will seek to prevent or mitigate human rights impacts in related.
5. The company will provide a process that represents due diligence process of identification, prevention, relief issues and impact on Human Rights.

6. The company will be involved in considering the impact on Human Rights and rehabilitation through the legal process.

Due Diligence on Minerals Sourcing from Conflict- affected or High Risk Area.

1. The company will provide various policies to demonstrate responsibility in the mineral supply chain in order to comply with the OECD guidelines (Organization for Economic and Cooperation Development), which consists of human rights policy, non-forced labor, non-worst forms of child labor, non-violence, abuse or immoral conduct, non-support of terrorism, unlawful treatment of individuals security, non-support money laundering, giving or accepting bribes or not paying taxes, against all kinds of crimes against humanity.
2. Provide risk identification and assessment in clause 1 above for the source of raw materials and high-risk areas according to the OECD criteria.
3. Provide procedures for improvement or development to reduce risk and consider the operation.
4. In case of inability to assess risk, the Third-Party Audit method will be applied.
5. Reporting and review every year, as well as to communicate to the stakeholders.

Anti-corruption, Bribery and Facilities Payment Policies

1. The company defines the meaning of corruption which is to give in any kinds of bribery by proposing, pledges, acceptances, induced to illegal acts in giving, pledge, claim, or accept any money, property or other improper benefits directly or indirectly, for a person to act or refrain to perform duties, which is to acquire or maintain business or recommend business to the Company, or to obtain or maintain any benefits that improper for business.
2. The company and all employees will conduct their business with honest, integrity and transparency, not involve with any kinds of corruption, directly or indirectly.
3. The company and all employees will not be neglected or ignored when an action that is deemed to be a corruption act has been found, by inform the executive or the person who is in charge.
4. The company and all employees will not accept or pay gifts or other endorsements for any individual who do business with the company beyond necessity. Receiving gifts must not exceed the value of the stipulated traditional occasion, and must be noted and report to the executive.

5. The company has established a channel for Whistle-Blowing Service for offences or received complaints by encouraging employees and stakeholders to monitor. If any employee or stakeholder finds any action which mislead from good governance principle, ethics, company regulations, illegal, action that violate the rights of stakeholders or may cause damage to the company. Employees or stakeholders can report any wrongdoing, violation of rights of stakeholders or any things that may cause damage to the company in such channels.
6. The company shall provide fairness and protection to any employee or whistle-blower who has reported or provided evidence in corruption related to the company, including employees who refuse fraudulent conduct, even if the company loses its business opportunity without reducing position, punish or negative consequences. The company will provide care, protection whistle-blower or an appropriate cooperate on the reporting of corruption.
7. The company will keep the complaint or involve with the complaint's information confidentially and not disclosed to other persons unless it is necessary in order to operate accordance to the regulations or in accordance to the law. If the information is disclosed, the company will take disciplinary action and/or acts in the law as the case may be.
8. In case of sufficient evidence that the complainant behaves dishonestly or accuse the alleged offender. The company will take action to protect the reputation of the alleged offender by considering disciplinary action, or if the complainant is a third party and the company is damaged, the company may continue to take legal action.

Policies on Anti-money Laundering or Financial Terrorism.

1. The company is committed to protect itself from being a part of the money laundering or financial terrorism support.
2. The company will document and apply the Know Your Counterparty (KYC) policy and procedures for business partners who are suppliers and customers with respect to gold, silver, PGM, diamonds, colored gems or jewellery products which assembled by these materials. Policies and procedures must:
 - a. Identify parties by checking government-issued ID card. This procedure adopted by assessment on risk assessment, or related laws. For the sake of expressing ownership in accordance with the principles of the parties.
 - b. Review the parties, and if possible, the owner who received the benefits is not list in an organization involved in money laundering, fraud or involvement with prohibited organizations and/or those financial conflicts.
 - c. Maintain understanding in the nature and righteousness of the business.

- d. Investigate any unusual transactions or suspicious activities and money laundering report or finances of terrorism from the relevant authorities.
 - e. Keep sufficient records for at least five years as required by the law.
3. The company will conduct the responsibility to comply according to the KYC's (Know Your Counterparties) policies and procedures.
 4. The KYC's policies and procedures of the members must be current and appropriate, including training procedures of documentation and exam procedures as usual.
 5. The company will record all cash transactions or obvious links or cash-like transactions equal to or greater than 10,000 EUR/USD or the criteria set by applicable law (whichever is lower) as required by law. Members must report such transactions to the relevant assigned authorities.

Security Policy

1. The company will assess the safety risks and set up the standards to protect employees, contractors, visitors, and employees employed by related business partners, for stealing the product, damage or replacement of the product in the workplace or during exhibitions and delivery.
2. The company will ensure that all security personnel respect the human rights and dignity of everyone and will strictly use force only as necessary and at the minimum against threats.

Labour Management Policy

The company defines labour management policies by setting out the details in the Company's Working Regulations.

1. The company will provide employment conditions relating to wages, working hours and others by defining in the working regulations, and inform to employees.
2. The company will not avoid complying with labour and social security laws.
3. The company will keep appropriate employees records, including payment, total wages, working hours, overtime hours.
4. The company will comply with labour law by requiring employees to have a normal working time of not more than 48 hours a week.
5. Overtime may occur with the consent of an employee under the labour law and will not be enforced, threatened to terminate or be forced to accept or quarantine or punishment for not working overtime.

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6. The total number of hours of work, overtime will not over 60 hours per week, unless there is an agreement together or in exceptional circumstances such as peak production period or during an accident or emergency, which must be given the consent of the employee and appropriate equipment is required to protect the health and safety of the employee.
7. The company will arrange a weekly rest day at least 1 day a week, as defined in the working regulations.
8. The company will arrange for traditional holidays and leave, including maternity leave, annual holidays which will be paid according to the law, as defined in the working regulations.
9. The company will arrange annual holidays in accordance with labor law which will be paid.
10. The company will pay the employee not less than minimum wage rate as required by law.
11. Overtime pay arrangement will not be less than as required by law.
12. The company will arrange payment according to the methods and periods set forth in the Work Regulations.
13. The company will not deduct employee wages unless it is permitted by law.
14. The company will not force employees to purchase food or other services from the facilities provided to employees without choice.
15. The company will not pay advance wages, and the payment is subject to the law.
16. All kinds of violence and harassment in the workplace are prohibited, including nonphysical punishment. Acts of vilification or shame, sexual harassment, physical abuse, psychological abuse, verbal or sexual discrimination, interaction and intimidation, whether direct or indirect in any form are prohibited in the workplace. Employees must be treated with respect, honor, not under threat or violence or threaten against employees, family or colleagues.
17. The disciplinary process, the disciplinary procedures and the equal treatment of employees which is defined in the working regulations, have to inform to the employee.

Policy on Worst Form of Child Labour.

1. The company will not participate in or support child labour as set out in the ILO Convention, the 138th meeting and recommendation 146, which imposes a minimum age for basic work at 15 years old, so that children can complete compulsory studies.
2. The company will not participate in or support child labour in the worst form as defined in the International Labor Organization Convention, the 182nd meeting and recommendations from the 190th meeting, which include:
 - a. The use of child labor in harmful way by its nature or circumstances which likely to be harmful to health, safety or morality in people younger than 18 years old.
 - b. All forms of child slavery and practices similar to slavery, including debt, child trafficking and forced child labor and the use of children in combat.
3. If any place of child labor is found, the company will document the use of child labor and provide a healing process that includes the ongoing welfare process of the child, and consider family status and rehabilitation, including the withdrawal of children participating in child labor, and in case of the child is subject to compulsory education or attends school, adequate support must be provided until compulsory graduation.

Non-Forced Labour Policy

1. The company will not participate in or support forced labor, including binding, bonded, or involuntary labor, as defined in the 29th meeting of the International Labor Organization Convention.
2. The company will ensure that all employees work in voluntary situations, by:
 - a. Not limit the freedom to move or the movement of employees in the workplace in an inappropriate area.
 - b. Not confiscate or hold employee's documents, such as ID card, work permit.
 - c. Not recruit employees by fraudulent means or require employees to pay all or some money, property or fees for recruit personnel. If the employee is paid, it must be reimbursed.
 - d. Not suspend any part of the salary, benefits or property of employees to force employees to continue their work, unless the suspension of wages or benefits is imposed by labor law.
 - e. No measures to prevent employees from terminating, after the notification is made at the appropriate time required by law.

3. The company will not engage in or support human trafficking or fraudulent recruitment by any means and/or binding employees to work, by communicating this requirement clearly to the recruiter, agent or service provider that employees work for, and have to review their relationship and to resolve the negative impact on human rights.

Policy on Freedom of Association and Negotiation

1. The company will respect the rights of employees to gathering independently in the organization they choose without interference or negative consequences. The company must ensure that employees who wish to register or join their chosen organization are not threatened in any form.
2. The company will respect the rights of employees to negotiate together and will adhere to the negotiation in the agreement. The company will participate in negotiations under the law, which is based on the principle of honesty in the negotiation.
3. In case that the law limited the right of freedom to association and negotiation. The company will not obstruct alternatives choices under the law.

Discrimination Policy

The company will not implement or discriminate in any form in the workplace, in the terms of employment, the continuous work, payment, overtime access to training, professional development promotion, termination, or retirement, which includes discrimination based on race, skin color, ethnicity, caste, national origin, religion, disability, or genetic basis, gender, sexual orientation, union membership, popularity politics, marital status, parent or pregnancy situation, physical appearance, HIV status, age or other natural personal characteristics, which unrelated to job requirements. The company will ensure that anyone who is 'fit to work' will receive equal and non-discriminatory opportunities on the basis of factors unrelated to their ability to perform tasks.

Safety & Occupational Health Policy

1. The company will provide safe and healthy working conditions for all employees in accordance with applicable laws and other relevant industry standards.
2. The company will also provide and maintain the workplace and accommodation in the relevant premises.
 - a. Safe and accessible drinking water.
 - b. Hygiene facilities for eating and storing food.
 - c. The cleaning facilities and clean toilets correspond to the number and gender of the employee.

- d. Fire safety equipment and alarms.
 - e. Clearly unlock mark, unlock emergency exits and escape routes.
 - f. Access enough power supply and emergency light.
 - g. Suitable conditions for pregnant women or nurses or alternative work arrangements to avoid improper workplaces.
3. The company must assess the risk of harm in the workplace and take control to reduce the risk of accidents and injury to employees. Risk assessment scrutinizes the dangers associated with the activities and products of members, including the use of machines and mobile devices, in the case of involving the storage and management of chemicals, consisting of cleaning materials, excessive exposure to smoke, air borne particles, noise levels and temperature and/or lighting and insufficient ventilation, residues from repetitive activities, considerations for workers under the age of 18 and pregnant women, and general hygiene and housekeeping issues.
4. The company will arrange the Health and Safety Cooperation Board to pick up and discuss about health and safety issues with management.
5. The company will provide training and information about health and safety to employees in the ways and languages that they can understand. It includes training and information about:
 - a. Determining various roles related to health and safety hazards and procedures for specific controls.
 - b. Appropriate action, in case of an accident or emergency.
 - c. Fire and emergency safety procedures.
 - d. First Aid Training for assigned employee representatives.
 - e. The rights and responsibilities of workers to strike, or refuse to work insituations where there are uncontrollable hazards, and demonstrate these situations immediately to those who are near risk and to the management authority.
6. The company will provide appropriate personal protective equipment (PPE) for free of charge and ready to wear, or appropriate caution.
7. The company will provide adequate access to first aid benefits in workplace, as well as trained first aid personnel. There is an appropriate process of transferring to the local medical facility, in case of medical emergencies and assist the operator who injure from work to access medical care in accordance with the laws of the country and the company's policies.

8. The company will prepare emergency procedures and evacuation plans for health and safety with reasonable expectation and appropriateness in case of emergencies. These must be accessible or clearly displayed, tested regularly (including through evacuation drills) and updated periodically.
9. The company will investigate health and incidents, and provide presentation of results for review of related hazard control, as well as identifying opportunities for improvement.
10. The company will not use diamonds containing cobalt.

Environmental Policy

1. The company will comply with the relevant environmental regulations, rules and laws.
2. The company will prevent or take any action to reduce environmental impact to the surrounding society.
3. The company will operate, manage, take action, improve, review and develop in related areas, as well as cultivate environmental consciousness effectively.
4. The company will encourage the conservation of resources by using 3R principle (Reduce, Reuse, Recycle) in the best benefits of the organization.
5. The company will provide environmental and energy conservation knowledge to employees, executives and others whom may concern.

Natural Resources Policy

The company will support the conservation of various resources by using the 3R principles (Reduce, Reuse, Recycle) for maximum benefit to the organization.

Hazardous Substances Relevant Policy

1. The company will maintain an inventory of hazardous substances at facilities. Safety data sheets (or equivalent) will be accessible wherever hazardous substances are used and their associated risk will be clearly and actively communicated to all employees who work with them.
2. The company will not manufacture, trade or use chemicals and hazardous substances subject to international bans. Any hazardous substances subject to international phase-out will not be manufactured or traded and their use will be phased out in accordance with the regulation.
3. Wherever technically feasible and economically viable, the company will use alternatives to hazardous substances in the processes.

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In order to achieve this system, this will make the business sustainable. Hereby, announces to all employees and adheres to the common practice.

Announced on 17th August 2023

A handwritten signature in blue ink, consisting of several overlapping loops and lines, positioned centrally below the announcement date.

(Mr. Jean Rene Eric Piat)
Managing Director

Announcement Management Representative in RJC system

Under the responsible enterprise policy of Rubicon Co., Ltd., we hereby announce that, as the personnel who are responsible for preparing procedures, we must implement and monitor RJC Due Diligence to ensure consistency in the system preparation, by:

Mr. Thiti Tranantasin

The aforementioned person whom is assigned has these following functions:

1. Contact partners for achieve an active cooperation in the preparation of the system in order to understand the preparation of various procedures for responsibility in the supply chain, to ensure transparency and controllable.
2. Identify and assess the risk of the accountability system in the supply chain system.
3. Design and place responsive strategies in the supply chain system.
4. Conduct a review, by an independent third party, for the process of practices indicating what risks are in order to achieve transparency.
5. Deliver a report according to the procedure stipulated in entrepreneurship practices responsible for the supply chain. The report must be reviewed at least once a year.



(Mr. Jean Rene Eric Piat)
Managing Director
17th August 2023

Grievance Mechanism

Rubicon Co., Ltd. has established this grievance procedure to hear all concerns about circumstances in the supply chain involving colored gemstones from conflict-affected and high-risk areas.

Mr. Thiti Tranantasin, an administrator, is responsible for implementing and reviewing this procedure. Concerns can be raised by interested parties via email or telephone to:

Mr. Thiti Tranantasin

Rubicon Co., Ltd.

807–809 Silom Shanghai Building, 5th Floor, Soi Silom 17. Silom Road,
Silom Sub-district, Bangrak District, Bangkok 10500, Thailand

Tel. +6622367043 Ext. 109 or +66851951229

Email: tao@rubicon.co.th

On receiving a complaint, we will aim to:

- Get an accurate report of the complaint.
- Explain our complaint procedure.
- Find out how the complainant would like it addressed/resolved.
- Assess the eligibility of the complaint and, where applicable, decide who should handle it internally. In cases where we are unable to address the complaint internally (e.g. where our company is too far removed from the origin of the issue raised in the complaint), we may redirect it to a more appropriate entity or institution, such as the relevant supplier or industry body.
- Where the issue can be handled internally, seek further information where possible and appropriate.
- Identify any actions we should take including hearing from all parties concerned, and monitoring the situation.
- Advise the complainant of our decisions or outcomes.
- Keep records on complaints received and the internal process followed, for at least five years.

(Mr. Jean Rene Eric Piat)
Managing Director
17th August 2023

Product Disclosure Statement

Part 1 Product Disclosure Proclamation

This product disclosure terms are designed to give those involved an understanding of what is needed in products, or the qualifications as required by law to ensure the decision to take action relating to the company's products. The product disclosure requirements provide general information to those involved in the product's qualifications to consider appropriate action for the purpose.

Part 2 Product Disclosure Requirements

This given message is an insurance policy of the company regarding diamonds and colored gems products which is written in ordinary term in order to achieve a consistent understanding as follows:

1. Treated: treated diamonds and thermal colored gems are revealed as 'treated' or referred to specific treatment methods. Description must be equally clear, such as the word "diamond" or the name of the colored gemstone. Any special care requirements that treated must be disclosed.
2. Synthesis: all or part synthetic diamonds or synthetic colored gems must be revealed as 'built by laboratories,' 'formed by laboratories,' and/or 'synthetic.' Description must be equally clear, such as the word "diamond" or the name of the colored gemstone.
3. Composite: the company will disclose the composite (assemble up) of diamonds and colored gems made from two or more parts as 'composites,' 'assemble up,' 'assemble up a pair,' or 'assemble up three parts,' and by the correct name of the material that consists. Description must be equally clear, such as the word "diamond" or the name of the colored gemstone used.
4. Rebuilding: diamonds and colored gems that are recreated will be disclosed and the description must be equally clear. It is clearly "diamond" or the name of the colored gemstone.
5. Replication (imitation): any artificial products used to mimic the appearance of diamonds or colored gems without using chemical elements, their physical qualification and/or their structure are revealed as 'imitator' or 'simulated up.' The name of the material along with the correct contained elements such as 'compound x,' 'glass,' 'plastic' description must be clear equally noticeable as the word "diamond" or the name of the colored gemstone.
6. Description of diamond grinding or gemstone grinding: explaining the size or weight of carat, color, contrast, or the grinding of diamonds and the quality of colored gems, followed by acceptable guidelines that are suitable for the scope.
7. When explaining the origin location of the colored gemstone: what information to consider? To disclose the place of origin is used only when it represents the geographical area where the gem is excavated.
8. Any relevant health and safety information about the material specified used in jewelry products sold by members must be disclosed.
9. Members must take significant action and have documents to avoid the purchase or sale of undisclosed synthetic diamonds. To members who purchase or sell diamond must:

10. Obtain a written warranty from the supplier.
11. Have effective training procedures and tracking system to avoid the possibility of disclosed synthetic diamonds which had been transformed to natural diamonds at their factory.
12. Use a thorough monitoring process to identify and reduce the risk associated with undisclosed synthetic diamonds enter in their supply chain, as well as identifying high-risk contaminants.
13. For high-risk grinding diamonds, conduct tests using reliable and transparent protocols. This can be an industry-recognized protocol or a protocol that members define. Protocol must be:
 - i. Include the right method for testing diamonds that are not measured and set up.
 - ii. Include internal testing with using relevant and effective detection devices or external testing by qualified providers such as gem laboratories.
 - iii. Include at least once tests in the process which there is no risk of an undisclosed presentation anymore, including through synthetic before selling diamonds. This is normal process before sales, providing customer service, as well as test reference management procedures.
 - iv. All are organized for customers as a process for management and reference.