

Constantin Wild GmbH & Co. KG Code of Conduct

Our Commitment to Excellence

Constantin Wild GmbH & Co. KG, with a legacy spanning over ten generations, is committed to leading the gemstone industry through ethical, responsible, and sustainable practices. This Code of Conduct aligns with international standards such as the UN Guiding Principles on Business and Human Rights, OECD Due Diligence Guidance, and meets the rigorous expectations of our valued partners.

Values and guiding principles of Constantin Wild GmbH & Co. KG

- » We are a reliable partner
- » We value our employees and business partners
- » Based on our tradition, we are open to innovations
- » We implement our ideas in a lively and efficient manner
- » We always act in a focused and consistent manner
- » We have clear rules of conduct for all employees in the company
- » We are committed to our social responsibility for society and the environment
- » We live a modern, fair and motivating management culture
- » We are fully committed to fair and law-abiding behavior in competition
- » We consistently monitor compliance with our Code of Conduct
- » We are committed to respecting human rights in accordance with the UN Human Rights Charter.

Vision

Our vision is to be the most respected and trusted partner for jewellery brands and designers in the world of exceptional gems.

Mission

With a family heritage spanning over ten generations, our mission remains to illuminate the colors of the world's most exciting gems, revealing natural luxury and inspiring unique emotions.

1. Labor Standards and Social Responsibility

Prohibition of Child and Convict Labor

We strictly prohibit child labor under the age of 16 or higher where local law is mandated. In countries where local laws set a higher age for child labor or a higher age for completion of compulsory education than 16, the highest age applies.

Prohibition of Forced Labor and Human Trafficking

All forms of forced labor, slavery, servitude, and human trafficking are rejected. We do not engage in or tolerate convict labor across any operations or supply chains. All workers have the right to freely enter and leave employment. Suppliers must respect workers' freedom of movement. Suppliers cannot require workers to work to repay a debt owed to them or a third party. Practices such as withholding identity papers, requiring deposits or bonds, or any constraints limiting workers' freedom of movement are strictly prohibited.

Prohibition of Discrimination

Discrimination in any aspect of employment, including hiring, retention, compensation, training, promotion, or termination, is prohibited. This includes discrimination based on race, color, ethnicity, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, marital or parental status, or veteran status.

Fair Wages and Overtime Compensation

Workers shall receive fair wages that meet or exceed local minimum wage laws or, in the absence of such laws, industry averages. In addition, all overtime hours must be compensated at a rate at least equal to the average minimum rate in the relevant industry where no legal standard exists. Wages must be sufficient to cover the workers' basic needs and provide some discretionary income. Wage deductions should not be used as a disciplinary measure. Suppliers must communicate the wage structure and wage periods to all workers.

Working Hours

Working hours must comply with applicable local laws and international labor standards. Workers are entitled to at least the minimum number of days off established by applicable laws and at minimum must have at least one day off in every seven-day period. Excessive overtime hours are prohibited.

Freedom of Association

We expect our suppliers to respect workers' rights to organize, join labor organizations, and engage in collective bargaining. There will be no retaliation or discrimination against those exercising these rights.

Health, Safety, and Security

We expect our suppliers to provide a safe and healthy workplace by adhering to local and international health and safety laws. Workers receive training to detect, prevent, and mitigate risks related to equipment, chemicals, and operations. Additionally, security operations must comply with the Voluntary Principles on Security and Human Rights to ensure worker and visitor protection while upholding human rights.

Suppliers are expected to establish procedures and training to identify, prevent and mitigate, to the extent practicable, any hazards that pose a risk to the health, hygiene and safety of employees.

2. Environmental Compliance and Performance

Environmental Management Systems

We strive to implement robust environmental management systems, to monitor and continuously improve our environmental performance.

Consciousness of environmental impact

We expect actions to ensure that suppliers' employees whose activities have a direct impact on the environment are trained and skilled and have the resources necessary to perform their jobs effectively, considering these environmental commitments.

Greenhouse Gas Emissions and Resource Efficiency

We actively reduce or balance greenhouse gas emissions wherever possible. Resource efficiency, particularly in water and energy usage, is a key focus in all operations.

Chemical and Waste Management

Safe management of chemicals and waste is ensured in compliance with national and international regulations, including, but not limited to, REACH.

3. Ethics and Business Integrity

Prohibition of Corruption and Money Laundering

We maintain a zero-tolerance policy for corruption, bribery, and influence peddling. Facilitation payments are strictly prohibited. Anti-money laundering policies are implemented to prevent illicit financial activities.

Conflict of Interest

We identify and mitigate conflicts of interest in all business relationships to ensure integrity and transparency.

Gifts and Invitations

Gifts and invitations are only acceptable if they reflect customary business practices, permitted under applicable law, are of nominal value, and do not influence or appear to influence business decisions. Cash gifts are strictly prohibited.

Transparency and Information Integrity

We ensure all claims and representations about our operations, materials, and products are accurate and truthful, avoiding any form of misleading information.

Respect of Competition

Suppliers agree to take all appropriate measures to prevent abuse of a dominant position, concerted practices or unlawful agreements between competitors, such as price-fixing, market allocation or boycotts limiting the production of certain products.

Confidentiality

All non-public and sensitive information obtained during business operations is safeguarded with the highest level of confidentiality.

Protection of Personal Information

Suppliers shall take all appropriate measures to comply with all applicable laws and regulations regarding the protection of personal information.

Customs and Security Authorities

Suppliers shall comply with applicable customs laws and regulations, including those relating to imports and the prohibition of transshipment of goods to the importing country.

Trade restrictions and international sanctions

Suppliers must comply with all applicable international trade restrictions and economic and trade sanctions, including any changes to such measures, and all applicable laws and regulations regarding export and import controls.

Protection of Intellectual Property

We actively protect intellectual property rights, brand reputation, and other assets across all business operations.

4. Grievance Mechanisms and Compliance

Secure Grievance Channels

A secure and anonymous grievance mechanism is provided for all workers and stakeholders. This can include hotlines, online portals or message boxes that allow concerns to be reported without fear of retaliation.

Audits and Worker Accessibility

External auditors are granted unrestricted access to facilities and workers during audits to verify compliance with this Code. Workers must feel free to communicate with auditors without management interference or fear of reprisal.

Dissemination and Worker Training

This Code is communicated to all workers and subcontractors in their local languages. Training is provided to ensure understanding and compliance with these principles.

5. Supply Chain Management

Responsible Sourcing

We implement a Responsible Sourcing Strategy that complies with international standards. Suppliers must adhere to the OECD Due Diligence Guidance.

Prohibition of Support to Armed Groups and Corruption

Direct or indirect support to non-state armed groups or unlawful public/private security forces is strictly prohibited. Suppliers must not engage in bribery or misrepresentation regarding the origin of minerals or taxes paid.

Engagement with Security Forces

Security forces engaged in our supply chains must comply with the Voluntary Principles on Security and Human Rights. We work transparently with stakeholders to mitigate risks related to security operations.

6. Acknowledgement and Certification

By engaging with Constantin Wild GmbH & Co. KG, our partners acknowledge and commit to upholding this Code of Conduct throughout their operations and supply chains.

Representative Name: _____

Position: _____

Signature: _____

Date: _____