

PZ STELMACH
COMPANY: OPOLE



S T E L M A C H
Supply Chain Policy

Edition: 1
Date: 01/06/2023

Edition	Approved by:	Allowed by:	Date:
1	PZ Stelmach Sp. z o. o Management Board President	PZ Stelmach Sp. z o. o Management Board President	01/06/2023



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POLICY STATEMENT

This policy confirms the company's commitment to respect human rights, avoid contributing to conflict financing and comply with all relevant UN sanctions, resolutions and regulations.

The Production Director is responsible for the Supply Chain Policy.

PZ Stelmach Sp. z o. o is a member of Responsible Jewellery Council (RJC). We therefore undertake to prove, through an independent external verification:

- a) respect human rights in accordance with the Universal Declaration of Human Rights and Fundamental Rights at Work of the International Labor Organization,
- b) not engage in or tolerate bribery, corruption, money laundering or terrorist financing,
- c) support transparency of government payments that comply with the rights of mining industry security services,
- d) not provide direct or indirect support to organized criminal groups,
- e) allow the stakeholders to express their concerns about the jewellery supply chain,
- f) implement the OECD 5-step framework as a risk-based due diligence management process for responsible mineral supply chains from conflict-affected and high-risk areas.

We also commit to use our influence to prevent abuse by other entities. Our suppliers come from regions that are not affected by any conflict or high-risk areas (CAHRA). We identify risk areas based on the occurrence of armed conflicts, widespread violence or other threats to human security. Our supplier is a certified RJC member and therefore complies with the OECD guidelines.

In relation to serious abuses related to mining, transport or trade in diamonds/coloured gemstones

We will not tolerate, benefit from, contribute to, assist or facilitate the performance of:

- a) torture, cruel, inhuman and humiliating treatment,
- b) forced or compulsory labour,
- c) forcing children to work,
- d) breaking and violating human rights;
- e) war crimes, violating international humanitarian law, crimes against humanity or genocide.



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We will immediately cease working with suppliers if we determine there is a reasonable risk that they are engaging in the abuses described above or are sourcing from or associated with any party that is engaging in such abuses.

Declaration on no direct or indirect support or cooperation with organized criminal groups.

We only sell or buy jewellery/diamonds/coloured gemstones that fully comply with the Kimberley Process Certification Scheme and the Dodd Frank Act, thus we will not tolerate direct or indirect support for organized crime groups, including but not limited to purchasing diamonds/coloured gemstones, making payments to or otherwise aiding or equipping the organized crime groups or their entities which illegally perform the following:

- a) control diamond/coloured gemstone mining locations, transport routes, trading points and the upstream supply chain entities;
- b) tax or extort money or diamonds/coloured gemstones at mines, on transport routes or at the diamond/coloured gemstone trading points or from intermediaries, export companies or international traders.

We will immediately cease working with the suppliers if we determine there is a reasonable risk that they supply or are associated with any party who directly or indirectly supports the organized criminal groups.

In relation to bribery and fraudulent misrepresentation of the diamonds/coloured gemstone origin.

We will not offer, promise, give or demand bribes and will oppose the solicitation of bribes to conceal or disguise the diamond/coloured gemstone origin or to misrepresent taxes, fees and royalties paid to the governments for mining, trading, handling, transporting and exporting.

In relation to public or private security services.

We confirm that their role is to ensure safety of the employees, facilities, equipment and property in accordance with the rules of law, including the law that guarantees human rights. We will not directly or indirectly support any public or private security services that are abusive or act illegally.

We will also support and contribute to efforts to eliminate money laundering where legitimate risks are identified resulting from or relating to mining, trading, handling, transportation or export of diamonds/coloured gemstones.

The policy meets the requirements of COP 2019 and considers the key aspects of risk related to the issues consistent with the OECD recommendations, such as:

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- serious human rights violations related to mining, trading and transport of minerals,
- direct and indirect organized criminal groups support,
- assisting public or private security services that illegally control the mining areas, transport routes and national institutions,
- bribery and disinformation regarding the origins of materials, as well as tax payments, fees and royalties that are paid to governments

SCOPE

The Policy applies to all entities related to **PZ Stelmach Sp. z o. o.** including its employees, directors, officers, contractors and third parties acting on behalf of the company. It is a document intended for internal use, and the company's Management Board is responsible for providing any interested person or entity with it. Failure to comply with the principles contained in the Policy will result in appropriate actions.

RESPONSIBILITY

The Production Director is responsible for the development and implementation of this Policy and the appropriate procedures, and **PZ Stelmach Sp. z o. o.** undertakes to review the Policy annually.

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(Responsible Person Signature)