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MAKAL SUPPLIER CODE OF CONDUCT

Makal is a jewellery design and retail brand. We believe that in business, innovation coupled with an ambition to make a difference in people's lives and to protect our natural world, results in benefits for all.

Our purpose is to deliver products to our clients with the assurance that at every step in the value chain we have a positive impact on the people, communities and the environment touched by our operations, and generate a superior financial return for our shareholders.

Makal's Supplier Code of Conduct is a set of core principles that are intended to guide our suppliers' performance in the areas of environmental management, people practices, responsible operations, and business integrity. The Supplier Code of Conduct is derived from and is fully aligned with the *Makal's Core Corporate Policies*,

Makal's Core Corporate Policies are intended to affirm our commitment to fundamental responsible practices in business and to guide our employees, managers and directors on how to conduct the company's activities. Respecting the law is an essential tenet of our Policies. Although providing a baseline of behaviour, legal compliance is a point of departure for Makal, rather than a destination. The Policies include our stand on legal compliance, how we treat each other in the workplace, corruption, transparency and reporting.

Makal expects its suppliers and business partners to adhere to this Supplier Code of Conduct at their operations and to communicate and encourage their own contractors and vendors to incorporate these principles into their business policies and practices. Makal suppliers will make all reasonable efforts to demonstrate its conformance to the Supplier Code of Conduct when requested by Makal. Non-conformance with this Supplier Code of Conduct could be considered a breach of contract and result in a cancellation of the agreement between Makal and its suppliers.

For this purposes of this Supplier Code of Conduct, a Supplier is an entity that provides a service or good to Makal, and includes arrangements with contractors, consultants, vendors and any other business partnership that involves an exchange of goods and services for benefits, monetary or otherwise.

This Supplier Code of Conduct consists of 13 Principles that are the minimum standards we expect our suppliers to meet. The Principles should be met wherever they are applicable in a supplier's operations.

If suppliers have any questions relating to how to apply the principles and practices outlined below, they are advised to contact their relationship manager at Makal.

1. **Legal Compliance:** Suppliers shall conduct all activities in strict compliance with the national laws of the countries where they operate and with all relevant international conventions where those are applicable in the country of operation.

It is the responsibility of our Suppliers' directors, officers and managers to know and keep abreast of changes to laws and regulations that affect their business.

Suppliers shall ensure that any production, delivery or other action subject to obtaining specific governmental, legal or regulatory permissions is only to be undertaken when those permissions have been granted.

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2. People Practices: Suppliers shall treat their employees with respect, and forbid child and forced labour and all forms of discrimination in the work place. Where possible and appropriate, they should seek to contribute to the development of their employees' skills through training programmes.

Suppliers shall develop and follow a comprehensive human resources policy and procedures that are fully compliant with the national laws in every country in which they work and conform and which should include protection of the privacy, safety and security of their employees.

3. Corruption: Suppliers shall not tolerate bribery or facilitation payments of any kind or support terrorists or any act of terrorism. They shall routinely assess which business activities are most susceptible to corruption and encourage and support their employees to report any incidence that might lead to or be perceived as corrupt and train their managers to respond appropriately.
4. Money laundering: In all business dealings, Suppliers shall conduct thorough due diligence and follow the principles of "Know Your Customer" and maintain records of all our transactions to avoid working with organizations or individuals who are involved in the illicit movement of money.
5. Product Integrity: The provenance of all our materials whether is gold, silver, gold nuggets or gemstones are accompanied by documentation clearly disclosing their quality and verified directly by Makal internal team.
6. Transparency and Reporting: Suppliers shall practice complete honesty and transparency in their business dealings and where possible report publicly their financial, social, environmental and governance risks and performance.
7. Industry Best Practices and Standards: Suppliers shall take steps to meet industry best practice standards for responsible business in their industrial sector.
8. Health and Safety: Suppliers shall commit to provide a safe and healthy workplace and to incorporate health and safety into organizational culture for their employees by working to the highest international standards. They shall provide health and safety training programme for their employees in order to prevent incidents on-site and to all reasonably possible to facilitate access to emergency assistance for all their employees.
9. Environment: Suppliers shall commit to the continual improvement of their environmental performance and the prevention of pollution throughout all their operations and facilities, to continually monitor across all operating functions, and to comply with all legal and environmental requirements applicable to their business.
10. Social & Community: Suppliers shall respect the culture of their neighbours and stakeholders. Where possible, Suppliers will employ local people and support local businesses in their own supply chains.
11. Human Rights: Suppliers shall seek to avoid civil conflict and be committed to ensure all human rights are upheld in line with the Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights regarding all employees and any other people who interact with their business.

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Suppliers shall develop appropriate management systems to ensure respect for international standards of human rights across all areas including: diversity; Indigenous Peoples; use of security personnel; fair wages; working conditions; handling hazardous substances; grievance mechanisms; forced and child labour and freedom of association and collective bargaining. They shall ensure that any incidents of non-compliance with international standards of human rights are investigated and addressed in an appropriate manner without compromising the confidentiality, or placing at risk any individuals or groups involved.

12. Compliance: Makal expects its suppliers to communicate the principles of the Supplier Code of Conduct to their employees, sub-contractors and relevant third parties with whom they do business so as to ensure the principles are integrated into their operations.
13. Non-compliance and Penalties: Makal reserves the right to terminate business relationships with any supplier that violates this Supplier Code of Conduct.

Any individual who is concerned about actual or suspected misconduct with regard to the terms of this Supplier Code of Conduct may report their concerns directly to Makal.

Company name	Makal Jewellery limited
Address	
Contact name	Daniela Colaiacovo
Position	CEO
Phone number, Fax number, E-mail	d.colaiacovo@makal.com
Name of your contact at Makal	Daniela Colaiacovo
Does your company have an individual responsible for implementation of the Makal Supplier Code of Conduct?	Yes
Does your company have a code of conduct or similar standards to which your suppliers adhere?	Yes
The terms of the Makal Supplier Code of Conduct are hereby accepted and agreed to on behalf of: MAKAL By : Daniela Colaiacovo	
Signature :	<i>Daniela Colaiacovo</i> Daniela Colaiacovo, CEO
Date : 28.12.2018	