

Company policy – Business ethics

Business ethics and social responsibility, health protection, proactive promotion of safety, development of a positive role towards the community, transparency in all communications with the stakeholders are pivotal values which must continuously inspire and drive a Company, in order to operate in a positive framework, aimed at growth and continuous improvement.

With the goal of respecting those guidelines, whilst assuring business continuity, PAMP adopted a management system for business ethics and social responsibility based on the international standard SA8000:2014 and on the ethical and environmental standards defined by the Responsible Jewellery Council (RJC).

Well conscious of its own operating context, and willing to monitor its changes promptly acting to risks and opportunities, PAMP management defines the following

POLICY FOR BUSINESS ETHICS AND SOCIAL RESPONSIBILITY

inspired by 3 essential principles:

1. **human resources.** Care for the needs, the rights and the dignity of each person, within the organization or outside its perimeter, but inside the Company's sphere of influence;
2. **occupational health and safety.** Constant evaluation of the risks, implementation of technical and organisational measures, continuous training of the personnel and auditing of the effectiveness of the safety rules;
3. **corporate social responsibility.** Respect of human rights, respect of the workers' rights, protection against children exploitation, fight against any form of discrimination, assurance of a safe and healthy workplace, attention to the quality of the working environment (by condemning any behaviour, even if verbal, connected to menace, violence or offence).

PAMP management, in relation to the enounced principles, personally commits to:

- make this policy for Business Ethics and Social Responsibility publicly available, and to regularly review and update it based on new knowledge and situations;
- make all necessary resources available so that the ethics and social responsibility management system can correctly be implemented and effective;
- share, within the Company and with the external personnel working on its behalf, the importance of the SA8000 and RJC standards;
- comply with all law requirements, and agreements related to environmental protection, occupational health and safety and labour; satisfy the rights of all persons involved directly or indirectly in its business processes, following the criteria given by the SA8000 standard, by the Responsible Jewellery Council (RJC) and by the international ILO conventions;
- reject any form of discrimination (e.g. connected to race, religion, gender, age or else) in any phase of the working relationship (from candidate selection to the end of the contract);
- reject any form of forced or compulsory work, within the Company or at its partners premises;
- foster a transparent and cooperating relationship with all institutions and all controlling entities;
- foster a relaxed and positive working environment, promoting respectful interpersonal relations at all levels and rejecting any improper, offending, oppressing, intimidating or violent behaviour – even if verbal – between all employees;
- review regularly, at the presence of a specifically nominated workers' representative, the application and performance of the ethics and social responsibility management system, by evaluating its results towards the defined goals;
- define specific goals in order to respect the declared principles;
- sustain the ethics and social responsibility management system in any situation;
- share and spread the policy, the code of ethics and the company values to all the stakeholders;

- accept, with specific reference to the SA8000 standard, unannounced audits by the certification body, being at the same time willing to provide relevant information responding to inquiries coming from the stakeholders;
- fulfil all the commitments declared in the code of ethics.

Claims related to the application of this policy can be addressed to PAMP (info@pamp.com), to the certification body SGS (sa8000@sgs.com / fax +39 051 63 89 826) and to the accreditation body SAI (SAAS, 220 East 23rd Street, Suite 605, New York, New York 10010, USA / saas@saasaccreditation.org / fax +212 684 1515).

Castel San Pietro, December 18th 2018

PAMP SA

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