

Ethical Code





ETHICAL CODE

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Ethical Code

The drafting of the Ethical Code is part of a path undertaken by Del Pia Srl and aims to define principles and initiatives aimed at affirming and communicating its values based on the concept of “corporate social responsibility”.

Introduction

1. Mission

In 1977 Romano del Pia founded a company specialized in the production of massive chains. His three sons Giorgio, Alfredo and Stefano began their training in the paternal company where they learned notions of all production processes, commercial and management skills. In 1991 they gave birth to an independent company, Del Pia S.p.A., with the approval of their father Romano who thus sees the dream of continuity of his passion for Goldsmith in his three children fulfilled. Del Pia is specialized in the production of goldsmiths with the use of cane and hollow chains, for products with a strong aesthetic value and an affordable price. Technological updating, essential for success in world markets, has given the company a good competitive advantage. Other success factors were the continuous innovation of the product and the skills of the workforce. The philosophy of the founder Romano has permeated the company which recognizes its values in team work, quality and service.

In recent years, the issue of social responsibility has established itself as an increasingly strong and central need. The ethical aspects of fairness, responsibility, transparency and respect for human rights seem to increasingly condition the economy and social systems, while at the same time the role of all interested parties (institutions, employees, suppliers, sub-contractors, costumers, associations, trade unions, etc.) increases within companies.

This Ethical Code contains the inspiring ethical principles and rules of conduct that the company management, employees, consultants, collaborators, agents, suppliers, business partners and all those who work in the name or on behalf of Del Pia Srl are required to comply in order to ensure the proper functioning, reliability and reputation of the Company and in order to prevent any behavior by those who work in the name and on behalf of Del Pia Srl. The principles and provisions of this Code list the general obligations of diligence, integrity and loyalty, which qualifies the fulfillment of work performance and behavior in relations with the community and in the workplace.

The need to draw up an Ethical Code arises from the awareness that integrity, reputation and profitability mainly depend on the individual behavior of its directors, employees, collaborators, sub-contractors and suppliers. The Ethical Code therefore aims to define the principles, values and behaviors that must inspire the performance of activities on a daily basis.

The adoption of unexceptionable behavior from an ethical point of view in what allows you to maintain and increase that heritage of trust, quality and seriousness, which Del Pia Srl has accumulate over his years of activity.

During 2021, the company embarked on a new project of obtaining RJC certification. The overall goal is a globally responsible supply chain that fosters trust in the global jewelry industry. RJC certifies all companies, large and small, that demonstrate compliance with the rules of a code of conduct regarding social and environmental responsibility.

2. Company policy

The Company Policy constitutes a public statement about the principles that guide Del Pia Srl's commitment to quality and social responsibility and which are functional to the definition of objectives and goals for improving company performance.

Available to all stakeholders, the Policy approved by the Management on 15.01.2021 has been defined in such a way to ensure that:

- Is appropriate for the purposes of the organization;
- Includes the company's commitment to comply with all the requirements of the reference standards and all those otherwise signed by the company;
- Includes the commitment to comply with National laws and other laws in force and to respect the International instruments implemented;
- Includes the commitment to continuous improvement and provides a structural frame work to define and review the improvement objectives;
- Is accessible to all interested parties through posting and controlling distribution to anyone requesting a copy;
- Is reviewed to ascertain its continued suitability.

3. Organizational structure

In order to ensure the correct implementation of the management system, Del Pia Srl has identified the following figures:

- An RJC System Manager who has the authority and the task of:
 - Ensure that a Social Responsibility System is established, applied and maintained;
 - Report to the entire management team on the progress of the management system and on the degree of satisfaction of the interested parties in order to allow its review and improvement;
 - Promote a culture of Quality and Social Responsibility within Del Pia Srl by encouraging the introduction of management techniques and criteria;
 - Promote within Del Pia Srl the importance of satisfying the implicit and explicit requests of each stakeholder.
- A risk prevention and protection service, that is, the set of people, systems and means external or internal to the company aimed at preventing and protecting against occupational risks in the company, or production unit; the members are:
 - A competent doctor with adequate qualifications;
 - A Head of the prevention and protection service (RSPP) able to represent the management in the protection of the health and safety of all staff who has the authority and the task of implementing the safety and health factors provided; the skills and professional requirements of the RSPP are adequate to the nature of the risks present in the workplace and related to the work activity
 - A Worker's Safety Representative (RLS) elected and chosen by the operating staff from among its members to represent the workers with regard to health and safety at work aspects;

- The first aid staff in charge of implementing the necessary measures in the field of first aid and emergency medical assistance;
- Firefighters, in charge of implementing fire prevention and fire fighting measures, evacuation of workers in case of serious and immediate danger, rescue.

The complete **Del Pia Srl** organization chart is available in the company.

Values

1. Ethics in business management

Del Pia Srl bases commercial relations with his interlocutors on principles of loyalty, correctness, transparency, efficiency and openness to the market.

The activities carried out by Del Pia Srl are carried out with commitment and professional rigor, acting in such a way to protect the prestige and reputation of the company. The business objectives, the projects, the investments implemented and the improvement actions undertaken, are aimed at developing corporate value and know-how in the long term as well as increasing the trust of all Stakeholders towards our company.

In order to spread business ethics , the company has implemented and disclosed policies on anti-corruption and extortion, conflict of interest, fraud, money laundering and anti-competitive practices.

2. Labor and human rights

By implementing a Social Responsibility model, we have adopted a corporate culture inspired by socially correct behavior towards workers, with particular reference to the following principles:

- Child labor
- Forced or compulsory labor
- Health and safety
- Freedom of association and the right to collective bargaining
- discrimination
- disciplinary practices
- working hours
- remuneration

Del Pia Srl considered it correct to comply with these principles, not only to concretely testify the duty to respect the human rights of workers in any type of process and organization, but also to promote them with its partners.

3. Protection of the environment

Our company identifies and evacuate all environmental risks derived from carrying out the activity, the particularly significant impacts on the environment and the opportunities to improve the obligations relating to environmental protection.

Checks and surveys are carried out promptly and periodically in order to minimize and reduce the identified environmental risks and significant impacts. This with particular reference to atmospheric emissions, discharges into public sewers, the management of hazardous substances, waste management and the use of natural resources.

4. Supply chain management

The strategic role and the high environmental and social impact of the supply chain has prompted Del Pia Srl to initiate a process of control of the supply chain that goes beyond the economic-commercial sphere. The need has therefore arisen to promote a sustainable supply chain, which begins with a careful selection of new suppliers and continues with a periodic review and monitoring of the same and existing suppliers, to ensure compliance with the parameters defined by Del Pia Srl in compliance with recognized standards. With this in mind, all internal company activities are also based on full compliance with all legislative requirements, voluntary regulations and specific customer requirements. The processes are planned and executed in the compliance with company procedures, constantly monitored through a monitoring system with performance indicators and improve where the need or opportunity arises in full compliance with the principles of the Plan-Do-Check-Act cycle. All this in order to pursue maximum customer satisfaction, responding effectively and promptly to all requests received.

Rules of conduct

1. Relations with employees

With regards to employees, Del Pia Srl is committed to respecting the following ethical principles:

- not to take advantage of or encourage the use of child labor;
- not to take advantage of or encourage the use of forced labor;
- guaranteeing a safe and healthy workplace for all employees;
- respect the right of workers to join and form trade unions;
- not to engage in discrimination of any kind;
- do not use or encourage corporal punishment, mental or physical coercion and verbal violence
- operate in compliance with International and National labor laws and the National Collective Labor Agreement;
- ensure compliance with the minimum wage levels provided by current legislation and by the National Collective Labor Agreement.

We are required to behave fairly in mutual relations and to apply an employment policy based on equal opportunities for all employees and collaborators, on dialogue, on listening to any needs and requirements of each in order to create an environment pleasant work, an atmosphere in which frank and loyal exchange of views is encouraged, and fostering the pursuit of staff well-being. We recognize everyone's right to the privacy of their private life, and we prioritize employee care, their health and safety in the workplace, professional growth and personal satisfaction and motivation.

1.1 Enhancement of individual skills

We value creativity and professional skills. The fundamental objective is to allow each employee to be able to best express their individual potential and to encourage them to make good use of their talents.

For this we turn our attention to:

Training and empowerment

We are committed to offering constant training, both in the context of the required work performance, and in terms of making our employees responsible for compliance with the rules of conduct and the correct use of company assets.

Listening and dialogue

We are committed to listening and talking to our employees to try to reconcile, when possible, the needs of the company with their personal and family needs.

For any grievance and/or company problem, employees can contact our Worker's Representative who will present such grievances in writing (as per the CCNL) to the management.

Encouragement of the spirit of belonging

We are committed to promoting and encouraging the spirit of belonging among our employees, creating an internal climate of cooperation, exchange of professional knowledge, essential for pursuing the corporate mission. Employees, in order to allow the implementation of the commitments undertaken by the company, are required to:

- give maximum commitment in training activities;
- responsibly manage requests for permits related to personal or family needs, thus making it possible to establish a relationship of mutual trust with the company;
- behave correctly and professionally with their colleagues, avoiding competitive and ethically incorrect behavior.

1.2 Protection of health and safety

We are committed to ensuring healthy and safe work environments, in which the physical and mental integrity of each employee is protected through compliance with the highest levels of protection and prevention from accidents, and through constant attention to improving safety conditions. Employees, in order to allow the implementation of the commitments undertaken by the company, are required to show themselves available to participate in training events on health and safety, are also required to pay the utmost attention to the information they receive, and to comply with all internal health and safety provisions.

1.3 Equal opportunities

We are committed to guaranteeing equal opportunities to each employee regardless of gender, race, religion, political, personal and social opinion. In this sense, we apply criteria of merit and competence, without any discrimination, at every stage (selection, hiring, training and salary growth).

Compliance by employees with the principles contained in this Ethical Code is considered an important indicator in the application of incentive systems and professional growth.

2. Relations with costumers

Del Pia Srl considers the costumers as a partner with whom to work for the satisfaction not only of his needs, but also of the company expectations, in an atmosphere of transparency, respect for environmental requests and trust.

We base our relationships with customers on the value of attention, both to offer unique creations that reflect the tastes and expectations of costumers, and to handle any complaints with the utmost seriousness and professionalism.

2.1 Commitment and professionalism

We are committed to putting our professionalism at the service of costumers, with the aim of creating lasting relationships and mutual respect with them.

2.2 Confidentiality

We guarantee the utmost confidentiality regarding the identity of our customers and the exclusive products that are made for them. Employees are required not to use and/or disclose confidential information acquired during their work, without prior authorization.

3. Relations with suppliers and business partners

Del Pia Srl has structured a system for selecting and qualifying, monitoring and raising awareness of its suppliers, asking them to comply with the rules and commitments that the reference standards and the system itself require to satisfy. The most critical sectors have been identified in relation to the aspects of social and environmental responsibility and targeted checks are planned at some suppliers in order to check, in a more direct way, compliance with the requirements.

3.1 Transparency in the selection

We choose our suppliers and our business partners inspired by merit-based criteria based on professionalism, solidity and cost-effectiveness, applying internal procedures aimed at ensuring the best traceability and transparency. In particular, we only use precious metal for refiners or suppliers of fine metal, gold or silver, included in the LBMA Good Delivery List, RJC certified and that respect the principles of social responsibility promoted by us.

3.2 Awareness and training

We undertake to make our suppliers and business partners aware of the issues of this Ethical Code, in order to demand compliance with the rules of conduct consistent with those set out here, especially with

reference to respect for human and workers' rights, and children's rights, and the sustainable and responsible management of environmental and social impacts.

3.3 Fairness in relationships

We undertake to establish fair and transparent relationships with our suppliers and business partners and to define fair contractual conditions.

Suppliers and business partners are required to ensure the utmost professionalism, seriousness and punctuality in the execution of the required services.

4. Relations with the market

4.1 Fair competition

In pursuing our mission, we are committed to respecting the rules of fair competition and transparency in business, comparing ourselves with our competitors in a serious and collaborative way.

4.2 Management of sensitive information

We undertake to treat with the utmost confidentiality and in compliance with the relevant legislation, sensitive or privileged information regarding the company, customers, suppliers, business partners, competitors.

5. Relations with the environment

We welcome sustainable and efficient management policies to minimize the negative impact on the environment.

Employees are required, in the exercise of their daily work, to consume paper, water and energy in a sustainable way and to comply with the provisions relating to waste separation.

Del Pia Srl undertakes to comply with environmental standards relating to any aspect, including in respect of the neighborhood. No anomalies, protests or exposures from the neighborhood are ever reported.

6. Relations with Public Administration and Institutions

We are committed to ensuring maximum integrity and transparency in maintaining relations with the supervisory and control authorities, with the judiciary and in general with any public official, as well as with all the reference institutions of our territory.

7. Relations with other stakeholders

Associations and NGOs

It is the company's intention to establish collaborative relationships with the NGOs and voluntary associations operating in the field of protecting people's rights.



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Banks

It is the company's intention to strengthen the relationship of trust with the banks so that they maintain that esteem and trust that they have always given to Del Pia Srl.

Labor Unions

The corporate attitude towards trade unions is based on transparency, dialogue and collaboration.



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Methods of implementation

Without prejudice to the powers of the bodies pursuant to the law, all recipients of the Ethical Code are required to:

- actively contribute to the implementation of the Ethical Code within the scope of their competences and functions;
- know and observe the principles and contents of the Ethical Code in relation to the duties performer and the functions assigned;
- comply with all internal provisions introduced by Del Pia Srl in order to implement the Ethical Code or identity violations thereof;
- report any alleged violations of the Ethical Code to the RJC System Manager.

Individuals who hold management, responsibility or executive positions must represent an example and provide guidance in compliance with the principle contained in the Ethical Code towards their subordinates and ensure that they are aware that the company activity must always be conducted in compliance with the principles of the Ethical Code.

Final provisions

Our policy relating to the Responsible Jewelry Council (R.J.C.) and all its provisions is reviewed by us once a year. The relevant information is included in this Ethical Code.

This Ethical Code is approved by the Management of Del Pia Srl, any changes and/or update to the Code must be submitted for approval by aforementioned Board of Directors.

Date 15.10.2021

The Administrator

Giorgio Del Pia