

RABAT Responsible Jewellery Council Policy (RJC) and Supply Chain Integrity

Introduction

RABAT, a Jewellery Company headquartered in the prestigious Paseo de Gracia, Barcelona, boasts a legacy spanning over 40 years, underscored by an unhesitating commitment to exquisite craftsmanship, innovation, and ethical business practices. With a highlighted presence in Barcelona, Madrid, Valencia, Tarragona and Ibiza, RABAT human team formed by 230 dedicated and skilled professionals, embodies the business values, and contributes significantly to the success of the company.

Excellence, Ethics and Commitment

Throughout its history, RABAT has championed responsible business practices, fostering enduring relationships with clients, suppliers, and communities while upholding the highest standards of integrity, ethics, and sustainability.

RABAT envisions a future where the jewellery industry is characterized by responsible sourcing, fair labour practices, environmental sustainability, and ethical business conduct. The company is committed to play a leading role in shaping this future and contributing to a more sustainable and equitable world.

Membership and Adherence to RJC

RABAT's membership in the Responsible Jewellery Council (RJC) - an esteemed standards-setting organization dedicated to fostering responsible practices across the jewellery supply chain. RJC's mission, seamlessly aligned with RABAT's ethos, emphasizes ethical, human rights, social, and environmental considerations within the jewellery industry. RABAT pledges unwavering dedication to the RJC Code of Practices, which integrates these principles into every aspect of our operations, strategic planning, and decision-making processes.

Policy Commitments

1. Human Rights and Legal Compliance

RABAT is committed in respecting and protecting human rights:

- Prohibit all forms of forced or compulsory labour: RABAT accomplishes strictly adhere to international labour standards and conventions to prevent any form of forced labour within its operations or those of its suppliers.
- Ensure a safe and healthy work environment: RABAT maintains rigorous safety protocols and measures to guarantee a secure workplace for all employees and collaborators.



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- Pay fair wages and providing decent working conditions: RABAT ensures fair compensation and dignified working conditions for its workforce, complying with industry standards and local regulations.
- Prohibit child labour: RABAT prohibits the engagement of children in any form of labour within our operations or supply chain.
- Respect the rights of freedom of association and collective bargaining: RABAT supports and respects the rights of employees to form unions and engage in collective bargaining.
- Prohibit discrimination on any grounds: RABAT maintains a zero-tolerance policy against discrimination of any form, promoting diversity and inclusivity.
- Promote fair trade practices: RABAT engages in fair trade practices, ensuring equitable and ethical relationships with all stakeholders.

2. Social Welfare

RABAT contributes to the social and economic well-being of communities:

- Promote sustainable development: RABAT engages in initiatives aimed at sustainable community development, supporting projects that promote economic growth while preserving the environment.
- Support local businesses and suppliers: The global market, as Jewellery retailers, necessitates sourcing from various countries, it prioritizes collaboration with local businesses and suppliers within the communities where it operates. This supports economic growth, employment, and fosters community development in those regions.
- Invest in the education and training of its employees: RABAT invests in continuous learning and development programs for our employees to enhance their skills and knowledge.
- Engage with stakeholders on social and environmental issues: RABAT collaborates with stakeholders, including local communities and industry partners, to address social and environmental challenges.
- OECD Relevance: RABAT shall comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and RJC standards, designed to prevent and minimize non-compliance risks. Through diligent and regular Due Diligence, RABAT meticulously assesses the business partners, particularly those involved in minerals and metals supply. This practice enables us to identify, evaluate, and mitigate risks effectively at various stages of its supply chain operations.

Furthermore, the commitment to continuous improvement drives us to collaborate extensively with stakeholders, governmental bodies, and international bodies.

Through these collaborative efforts, RABAT seeks to enhance transparency, foster accountability, and continually refine our supply chain practices.

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RABAT shall complete the due diligence process prior to initiate new business relationships. RABAT only buys or sells diamonds that are fully compliant with Kimberley Process Certification Scheme.

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3. Environmental Responsibility

RABAT minimizes its environmental impact:

- Reduce the consumption of energy and resources: RABAT explores ways to minimize our energy and resource consumption, implementing efficient technologies and practices.
- Manage the waste responsibly: RABAT has robust waste management systems in place to reduce, recycle, and responsibly dispose of waste generated from our operations.
- Prevent pollution: The operational practices prioritize pollution prevention strategies to mitigate any adverse environmental impact.
- Promote biodiversity: RABAT supports initiatives aimed at preserving and promoting biodiversity in the regions where we operate, respecting and protecting local ecosystems.
- Support sustainable mining practices: RABAT prioritizes sourcing materials from suppliers adhering to responsible and sustainable mining practices and sources precious metals exclusively from RJC and LBMA Good Delivery certified entities.
- Invest in renewable energy and other sustainable technologies: RABAT actively invests in renewable energy sources and other sustainable technologies to reduce the carbon footprint.

4. Implementation, Monitoring, and Reporting

RABAT implements a robust management system:

- Regular employee training on responsible business practices and Sustainable Development Goals (SDGs): RABAT conducts regular training programs to ensure that all employees are aware of and committed to the ethical and sustainable business practices and their alignment with global SDG.
- Risk assessments and internal/external audits to monitor compliance: RABAT conducts comprehensive risk assessments and regular internal and external audits to identify, assess, and mitigate risks related to ethical business conduct and compliance with industry standards.
- Annual reporting on progress in policy implementation and SDG contributions: RABAT produces annual reports detailing the progress in implementing policies related to responsible business practices, human rights, social welfare, environmental responsibility, and supply chain integrity. These reports are publicly available on the website.

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- RJC Compliance: The reporting mechanism adheres to RJC requirements, ensuring transparency and accountability in the commitment to responsible business practices.

5. Supply Chain Integrity and Ethical Sourcing

RABAT extends its commitment to ethical practices in the supply chain:

- Proactive mitigation of non-compliance risks through Due Diligence processes: RABAT conducts comprehensive Due Diligence processes to identify, prevents, and mitigates potential risks associated with mineral sourcing from conflict-affected and high-risk areas.
- Adherence to OECD Guidelines for responsible mineral supply chains: The supply chain policies are aligned with OECD guidelines for responsible mineral sourcing, particularly from conflict-affected and high-risk areas.
- Complete the due diligence prior to new business relationships: Before engaging in any new business relationships, RABAT thoroughly completes the due diligence process to ensure the adherence of our partners to ethical and responsible practices.
- Only dealing in diamonds fully compliant with the Kimberley Process Certification Scheme: RABAT ensures that all diamonds sourced or sold comply strictly with the Kimberley Process, mitigating the risk of conflict diamonds entering our supply chain.
- Grievance mechanism ensuring stakeholders' active participation: RABAT has a grievance mechanism that not only allows stakeholders to voice concerns, also ensures their active participation in maintaining ethical standards within our supply chain.
- RJC Code of Practices and OECD Guidance: The supply chain integrity practices adhere to RJC Code of Practices and OECD guidelines, ensuring responsible mineral sourcing and ethical business conduct.

6. Prevention of Serious Abuses

- Strict opposition to associations with serious abuses: RABAT unequivocally opposes and disengages from any associations linked to serious abuses such as torture, forced labour, child labour, and violations of international humanitarian law.
- Swift action in response to identified risks: RABAT takes immediate and decisive action to disengage from suppliers associated with identified serious abuses, ensuring a zero-tolerance approach to such practices.

7. Non-Support to Non-State Armed Groups and Security Forces Standards

- Complete disengagement from support or procurement linked to non-state armed groups: RABAT ensures strict compliance, avoiding any direct or indirect associations with non-state armed groups concerning the procurement of precious metals and gemstones.



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- Support for ethical practices in security forces: RABAT abstains from supporting security forces engaged in abuses or illegal activities, fostering adherence to ethical standards and the rule of law.

8. Bribery, Misrepresentation and Money Laundering

- Zero-tolerance policy: RABAT maintains steadfast opposition to bribery, misrepresentation of the origin of precious metals and gemstones, and money laundering. We enforce rigorous internal controls to prevent and report any such occurrences.

9. Grievance Mechanism

Establishment of a robust grievance procedure: RABAT has implemented a structured grievance procedure, overseen by the compliance officer, to hear concerns about circumstances in the supply chain involving gold, silver, platinum group metals, diamonds and coloured gemstones from Conflict-Affected and High-Risk Areas or any other matter related to ethical business practice. This mechanism provides multiple channels for reporting, including surface mail, email, telephone, or an anonymous web form accessible through our website.

Concerns can be raised by interested parties via Surface Mail to:

Mr. Fruitós Richarte (lawyer) - VIADENUNCIA Av. Corts Catalanes, 5-7 1r 08173 Sant Cugat del Vallès Barcelona (Spain)

Via email: gruporabat@viadenuncia.net

Via telephone: +34 93 131 94 14

Or via our dedicated web form (also anonymously) available in the Internal Information System section at https://www.rabat.net homepage.

10. Sustainable Development Goals (SDGs) Integration

RABAT acknowledges the significance of the United Nations' Sustainable Development Goals (SDGs) as a blueprint for achieving a more sustainable future for all. The policy commitments align with several SDGs, including:

SDG 8: Decent Work and Economic Growth: Ensuring fair wages, decent working conditions, and supporting local businesses contribute to sustainable economic growth.

SDG 12: Responsible Consumption and Production: The commitment to reducing resource consumption, responsible waste management, and supporting sustainable mining practices resonates with this goal.

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SDG 13: Climate Action: The investment in renewable energy and sustainable technologies aligns with initiatives aimed at combating climate change.

SDG 16: Peace, Justice, and Strong Institutions: The adherence to ethical practices, opposition to abuses, and support for security forces aligned with this goal.

Conclusion

RABAT is a responsible business leader that is committed to upholding the highest standards of ethical jewellery practices. RABAT is committed to working with the stakeholders to ensure that the jewellery is sourced and manufactured responsibly, and that it operates its business in a way that is beneficial to all stakeholders. RABAT believes that by acting responsibly, the company can make a positive impact on the world and contribute to a more sustainable and equitable future.

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