



General Policy

Borsalino Diamanti srl, operating in the diamond trade sector, declares its commitment to manage and develop its business with constant vigilance and continuous improvement in the quality of its services in the respect of Human Rights, Business Ethics, health and safety in the workplace and environmental protection.

Therefore, in the implementation and management of its Organizational System, it has committed itself to adopting the principles of the Responsible Jewellery Council for the responsible management of its company.

Aware of the social responsibility to which companies must respond in order to achieve lasting and sustainable growth, our management applies the requirements of the Responsible Jewellery Council (RJC) and is committed to applying and promoting ethics, respect for human rights and social practices in a transparent and responsible manner.

The application of the Responsible Jewellery Council Standard involves a number of commitments identified in:

Business Ethics.

In particular, the company is committed to:

- Conduct its activities in the utmost compliance with ethical standards ensuring integrity, transparency, and compliance with applicable laws
- Not tolerate any kind of corruption or money laundering and monitor so that any suspicious practice is disclosed and countered
- Make the characteristics of its products clear in full and in detail
- Ensure the qualification of our sources to ensure that goods are not from illicit sources or areas of armed conflict fuelled by the proceeds from diamond sales
- Ensure compliance with our supply chain through direct and constant monitoring of counterparts
- Spread awareness of the importance of a responsible and carefully managed supply chain.

Human Rights

In particular, the company is committed to:

- Supporting the Universal Declaration of Human Rights decreed by the United Nations
- Not to use child labour or any form of forced or coercive labour
- Ensure high standards of safety in the workplace in accordance with national and international regulations
- Not discriminate against or apply degrading treatment, harassment, abuse, coercion or intimidation in any form

- Promote the importance of transparent communication at all levels of the organization by stimulating the possible reporting of misconduct caused by anyone working in the name and on behalf of its organization
- Comply with current labour laws and ensure compliance.

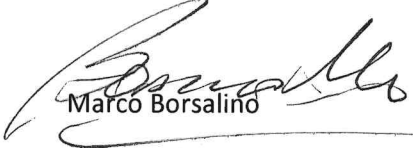
Responsible supply chain

In particular, the company is committed to:

- Conduct its activities in full compliance with ethical standards to ensure integrity, transparency and compliance with applicable laws
- Not tolerate any kind of corruption or money laundering in compliance with all national and international standards
- Fulfil all obligations of due diligence required towards counterparties by strictly applying the dictates of Know Your Customer/Client (KYC) guidelines
- Verify each counterparty and ascertain the legality of the origin of diamonds
- Discontinue any business transaction deemed suspicious and promptly report such to the relevant authorities
- Not enter into any business relationship with any organization where the beneficiaries are not identifiable
- Make full and detailed disclosures of the characteristics of our diamonds.

During the period of RJC Code of Practices Certification, no deviations from the Code of Procedures were noted, nor were any risky transactions detected in the Supply Chain under the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Cahra".

Valenza, 03/02/2026


Marco Borsalino
(CEO)