

**RESPONSIBLE
JEWELRY
COUNCIL**



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RJC Policy

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Announcement 1 /2025

RJC Management Policy

The purpose of this policy is to publicly affirm our commitment to RJC's vision of a responsible worldwide supply chain that promotes trust in the global jewelry and watch industry. This policy guides all employees, suppliers, contractors, and stakeholders in upholding these shared values. This policy applies to all employees, departments, suppliers, and third-party business partners working with Jewelarc International Ltd.

Jewelarc International Ltd. is a proud member of the Responsible Jewelry Council (RJC). As part of our ongoing commitment to ethical, responsible, and sustainable business practices, we fully support and adhere to the RJC Code of Practices as follows:

1. Compliance with the RJC Code of Practices across all areas of our operations.
2. Participation in RJC audits and certification processes as required.
3. Implementation of continuous improvement processes to meet evolving RJC standards.
4. Promotion of human rights, fair labor practices, and ethical sourcing throughout our supply chain.
5. Environmental stewardship, including waste reduction, emissions control, and sustainable resource use.
6. Transparent reporting and stakeholder engagement on ESG (Environmental, Social, Governance) performance.

Implementation & Responsibilities

1. The Managing Director is responsible for ensuring the effective implementation of this policy.
2. All department heads are accountable for aligning operations and processes with RJC requirements.
3. Training, monitoring, and internal audits will be conducted regularly to ensure compliance.

This policy will be reviewed annually and updated as necessary to reflect any changes in RJC standards or applicable laws and regulations.

Effective from 30 June 2025 onwards.



(Mr. Matthew James Triglone)
Managing Director

Announcement 2 /2025

Human Rights Policy

This policy sets out Jewelarc International's commitment to respect and uphold human rights throughout our operations and supply chains, consistent with the United Nations Guiding Principles on Business and Human Rights and the RJC Code of Practices. This policy applies to all employees, contractors, suppliers, and business partners globally, across all levels of the organization.

Jewelarc International is committed to respecting the dignity, freedom, and rights of all individuals, Supporting internationally recognized human rights as outlined in the Universal Declaration of Human Rights (UDHR) and ILO Core Conventions including avoiding complicity in human rights abuse and actively addressing any adverse impacts.

1. Labor and Employment Rights

- 1.1 Prohibit all forms of forced, bonded, or compulsory labor.
- 1.2 Prohibit child labor and ensure compliance with the minimum working age.
- 1.3 Ensure fair wages, working hours, and benefits in line with local laws.
- 1.4 Promote safe and healthy working conditions.

2. Non-Discrimination and Equal Opportunity

- 2.1 Provide equal opportunities for all individuals regardless of gender, race, ethnicity, religion, disability, or other protected characteristics.
- 2.2 Promote an inclusive, respectful, and harassment-free workplace.
- 2.3 Act against any form of discrimination or abuse.

3. Freedom of Association

- 3.1 Respect employees' rights to freedom of association and collective bargaining.
- 3.2 Ensure workers can engage in lawful organization and representation without fear of retaliation.

4. Indigenous and Community Rights

- 4.1 Recognize and respect the rights of Indigenous Peoples and local communities.
- 4.2 Engage in free, prior, and informed consultation on matters that may affect their rights and interests.

5. Supply Chain Expectations

- 5.1 Require suppliers and contractors to adhere to our Human Rights Policy.
- 5.2 Conduct risk-based due diligence to identify, prevent, and mitigate human rights risks.
- 5.3 Take appropriate action if human rights violations are identified in the supply chain.

6. Grievance Mechanisms

- 6.1 Maintain accessible and confidential grievance mechanisms for reporting human rights concerns.
- 6.2 Ensure all reports are investigated promptly, fairly, and without retaliation
- 7. Establish a performance indicator system to track the number of complaints received, complaints pending consideration, and those resolved.
- 8. Provide human rights training to employees and key stakeholders and raise awareness of rights, responsibilities and reporting procedures
- 9. Monitor human rights performance and conduct regular assessments, and review and update this policy annually or as required by law or practice.

Effective from 30 June 2025 onwards.



(Mr. Matthew James Triglone)

Managing Director



Announcement 3 /2025

Due Diligence and Complaint Policy

1. Jewelarc International Ltd., a manufacturer and exporter of precious metal jewelry adorned with diamonds and gemstones in Thailand, has developed and communicated this policy to affirm our commitment to respect human rights, avoid engaging in conflict financial transactions and comply with all relevant UN sanctions, resolutions and laws.

2. Jewelarc International Ltd. is a member of RJC. Therefore, we are committed to proving this through audits. By an independent third party that the Company acts as follows:

- Respect human rights as stated in the Universal Declaration of Human Rights and the International Labor Organization Declaration on Fundamental Principles and Rights at Work.
- Do not participate in or allow bribery, corruption, money laundering or financial support for terrorism.
- Promote transparency of payments to governments and security forces that are compatible with industry rights.
- Do not provide direct or indirect support to illegal armed groups.
- Enable stakeholders to voice their concerns about the jewelry supply chain.
- Implement the OECD 's 5-Step Framework as a management process for risk-based due diligence for responsible supply chains from conflict-affected and high-risk areas.

3. The Company is also committed to using its powers to prevent abuse or wrongdoing by others, using the OECD 's 5-step Due Diligence Guidelines for Responsible Supply Chains of Precious Metals from High-Risk Conflict Affected Areas, including provisions on the sourcing of precious metals, diamonds or coloured gemstones.

4. Regarding serious violations related to the extraction, transportation, trading of precious metals or trading of diamonds, colored gemstones, the Company will not accept or focus on making profit from participating in, helping or facilitating employment that has

- Torture or cruel, inhuman and degrading treatment.
- Forced labor or labor that is forced to be done as a result of punishment
- Use of child labor
- Human rights violations
- War crimes, violations of international humanitarian law, crimes against humanity or genocide.

5. The Company shall immediately cease any engagement or action with any supplier or supplier if it finds a reasonable risk that these suppliers are violating the terms described in Section 4 or are associated with or sourcing from any party that is violating these terms.

6. We will not tolerate direct or indirect support of non-state armed groups, which shall not be limited to providing gold, financial support or assistance or equipping non-state armed groups or their affiliates illegally, but shall also include:

- Control of mines, transportation routes and points where gold, diamonds/colored gemstones are traded, involving people in the supply chain.
- Taxes or extortion proceeds for precious metals, diamonds/colored gemstones from mines along transport routes or at points where gold, diamonds/colored gemstones are traded, or from middlemen, exporting companies or international traders.

7. The Company will immediately cease any engagement or operations with any supplier or supplier if we become aware of a reasonable risk that such supplier is sourcing from or is associated with any party that directly or indirectly supports non-state armed groups as described in Section 6.

8. The Company affirms that the role of state or private security forces is to provide security for employees, facilities, equipment and property in accordance with the rule of law, including laws guaranteeing human rights. Therefore, we will not directly or indirectly support state or private security forces that violate the rights referred to in paragraph 4 or commit illegal acts referred to in paragraph 6.

9. Regarding bribery and misrepresentation of the origin of precious metals, diamonds/colored gemstones, the Company will not offer, promise in the form of bribes or be the party requesting bribes, and will oppose the solicitation of bribes to conceal or disguise the origin of precious metals, diamonds/colored gemstones or to distort taxes, fees and royalties paid to the government to achieve the purpose of trading, processing, transportation and import or export of precious metals, diamonds/colored gemstones.

10. The Company shall support and participate in efforts to eliminate money laundering where there is reasonable risk that may be associated with the trading, processing, transportation and exportation of precious metals, diamonds/colored gemstones.

11. The said policy is based on the code of ethics of Jewelarc International Ltd. and implement it through a comprehensive management system within the company, regular employee training for employees to understand the importance of this policy.

12. The Company systematically inspects and evaluates the sellers to control the quality and efficiency of the products and services provided. Including risk management related to procurement.

13. The Company encourages all employees and stakeholders to express concerns about our supply chain or questions regarding traceability or identification of risks that may violate this policy. Please notify us immediately and contact directly at

- Quality Management Officer Email: Pum@jewelarc.com
- Operations Manager Email: Oh@jewelarc.com
- General Manager Email: Nicholas@jewelarc.com

14. Upon receipt of a complaint, the company will take the following steps:

- Acknowledge and accurately record the complaint.
- Explain the complaint-handling procedure to the complainant.
- Understand the preferred resolution or outcome expected.
- Assess the nature and eligibility of the complaint and determine whether it can be addressed internally.
- If the complaint concerns parties or matters beyond our operational reach, the company may refer the complaint to the appropriate party (e.g., supplier, industry association, or regulatory authority).
- If the complaint is actionable internally, conduct a fair and impartial investigation.
- Take appropriate corrective or preventive actions, if necessary.
- Communicate the outcome to the complainant in a timely and respectful manner.
- Maintain complete records of the complaint, investigation, and resolution for a minimum of five (5) years.

Effective from 30 June 2025 onwards.



(Mr. Matthew James Triglone)

Managing Director

Announcement 4 /2025

Anti-Bribery Policy

The purpose of this Anti-Bribery Policy is to affirm Jewelarc International Ltd.'s zero-tolerance approach to bribery in all its forms. The policy is designed to ensure compliance with ISO 37001, the Responsible Jewelry Council (RJC) Code of Practices, Thai anti-bribery legislation, and relevant international laws. This policy applies to all directors, employees, contractors, suppliers, and business partners of Jewelarc International Ltd, regardless of location or function.

Anti-Bribery Policy

- Bribery in any form—direct or indirect—is strictly prohibited.
- The Company prohibits offering, giving, requesting, or accepting bribes or anything of value that may improperly influence a decision or secure an unfair advantage.
- The Company does not tolerate facilitation payments, unofficial commissions, or inducements.

Third Party Risk

- Third parties acting on behalf of Jewelarc must adhere to this policy.
- Due diligence will be conducted on agents, intermediaries, and partners before engagement.
- Suspicious conduct must be reported to the Compliance Department.

Gifts and Hospitality

- Gifts and entertainment must be reasonable, infrequent, and lawful.
- All gifts and hospitality must be recorded in the Gifts Register.
- Cash gifts or equivalents are prohibited under all circumstances.

Training and Awareness

- Anti-bribery training is mandatory for all staff.
- Refresher training shall be conducted regularly.
- Awareness materials will be provided and visible throughout company premises.

Reporting and Whistleblowing

- Employees and stakeholders are encouraged to report bribery concerns confidentially.
- Reports may be made through the designated whistleblower channel.
- We will not tolerate retaliation against whistleblowers, we will keep information confidential and protect whistleblowers.

Disciplinary Measures

- Any employee found to have engaged in bribery will face disciplinary action, which may include termination and legal prosecution.
- Contractors and partners may be terminated and reported to authorities.

Monitoring and Compliance

- The Compliance Department will monitor the effectiveness of this policy.
- Regular audits and compliance checks will be conducted.
- Breaches of this policy will be reported to the board of directors.

Review and Approval

This policy will be reviewed annually and updated as required to reflect changes in law and business operations.

Reporting or Complaints Channels

The Company has set up a reporting system for clues or complaints by assigning **Operation Manager** to oversee the complaints system. The Company has opened channels for employees and stakeholders to report clues or complaints as follows:

1.1 Notify the direct supervisor.

1.2 E-mail to the Executive

- Operations Manager: oh@jewelarc.com
- Human Resources and Admin: jeab@jewelarc.com, pron@jewelarc.com

1.3 Notify by phone number 038-053-843

- **Ms. Oh** (Operations Manager) Extension 239, Mobile number 087-904-5665.
- **Ms. Pron** (Human Resources and Admin) Extension 244, Mobile number 082-716-8269.
- **Ms. Jeab** (Human Resources and Admin) Extension 241, Mobile number 088-022-9672.

1.4 Send a letter to Jewelarc International Ltd.

No. 16/23, Village No. 1, Soi Lung Song, Samet, Mueang Chonburi, Chonburi Province 20000.

1.5 Suggestion box.

The company has set up the point of installing the comment box in the area where there is no CCTV camera and is confident that it is a convenient and private area for employees and stakeholders.

The comment box has been installed as follows:

- First floor, there are 2 locations: Male restroom (Lift side) and Female restroom (Lift side).
- Second floor at the coffee station (elevator side).
- Third floor at the coffee station.

Formal investigative process

The person in authority has the power to appoint an investigation committee to conduct an investigation of the facts. The accused or the suspect has opportunity to informed of the charges or the issues being accused. The investigation process may require the accused or the suspect to explain the facts and present evidence.

Investigation Committee submit investigation summary Report. The facts obtained from the search for various evidence must be analyzed to prove whether the facts are true according to the accusation or not. When considering the weight of such evidence.

2.1 In the event that there is no basis or the accused's actions are not a disciplinary offense, it is proposed that the matter be terminated.

2.2 If there is evidence of a minor disciplinary offense or a serious disciplinary offense, submit it to the authorized person to appoint an investigation committee to consider and take further disciplinary action.

Effective from 30 June 2025 onwards.



(Mr. Matthew James Triglone)

Managing Director

Announcement 5 /2025

Know Your Counterparty Policy (KYC)

This policy outlines Jewelarc International's approach to Know Your Customer (KYC) practices to prevent financial crimes, ensure responsible sourcing, and comply with the Responsible Jewelry Council (RJC) Code of Practices, EU AML directives, and Thai anti-money laundering laws. This policy applies to all business units and individuals involved in onboarding, evaluating, and maintaining relationships with customers, suppliers, contractors, and other third-party entities.

The Company is committed to verifying the identity and legality of all business partners and preventing the facilitation of money laundering, the sponsorship of terrorism and the provision of conflict materials.

Identity Verification Requirements

- Full name, legal status, and country of incorporation (for entities).
- Government-issued ID, address, and contact details (for individuals).
- Ultimate beneficial ownership (UBO) for companies.
- Proof of operating licenses or certifications (e.g., KPCS, REACH, ISO).

Risk Assessment

- Evaluate counterparties based on geographic, industry, and transactional risk factors.
- Apply enhanced due diligence for high-risk or politically exposed persons (PEPs).
- Document findings and approval steps.

Documentation and Record Keeping

- Retain all KYC records, communications, and verification documents for a minimum of 5 years.
- Maintain secure and accessible electronic or physical records.
- Ensure audit trail is available for regulatory review.

Monitoring and Ongoing Review

- Conduct regular checks and updates on customer information.
- Flag unusual behavior or changes in business activity.
- Update risk assessments at least annually or upon material changes.

Responsibilities

- Sales and procurement teams must initiate KYC onboarding for new relationships.
- Compliance team must approve onboarding and monitor ongoing risk.
- Management must ensure proper implementation and oversight.

Training and Awareness

- Provide mandatory KYC and AML training to relevant employees annually.
- Raise awareness about red flags, risk indicators, and regulatory updates.

Non-Compliance

- Any failure to comply with this policy may result in disciplinary action, legal reporting, or relationship termination.
- Jewelarc International reserves the right to suspend transactions pending KYC clarification.

This policy will be reviewed annually or upon significant legal, regulatory, or operational changes to ensure relevance and effectiveness.

Effective from 30 June 2025 onwards.



(Mr. Matthew James Triglone)

Managing Director

Announcement 6 /2025

Security Policy

This policy defines Jewelarc International's approach to maintaining a safe and secure workplace. It covers physical access, surveillance, employee screening, and internal IT system security. It aligns with RJC Code of Practices, Thai labor and privacy laws, and EU GDPR standards. This policy applies to all facilities, employees, contractors, visitors, and internal IT systems operated or controlled by Jewelarc International.

The Company is committed to ensuring the physical and digital safety of its employees and assets, respecting the rights of its employees while implementing necessary security measures, and complying with applicable legal and ethical standards.

Company's and customers' assets

- The Company has established a system for controlling and inspecting the entry, exit, and transfer of Company's or customer assets both within the Company's premises and outside the company to ensure that there is no loss or fraud of assets.
- The Company has a inventory time frame for checking the assets of the company and customers to confirm that all assets are not lost.

Physical Security Measures

- All entry and exit points must be controlled via ID badge access or logged visitor registration.
- Visitors must be always accompanied in secure areas.
- Lockable storage and restricted access zones must be used for sensitive materials.

Surveillance and Monitoring

- CCTV cameras are installed in designated areas for safety, theft prevention, and operational monitoring.
- Cameras are not installed in private spaces (e.g. toilets, changing rooms).
- CCTV footage is retained for 30 days unless needed for investigations.
- All use of surveillance complies with Thai privacy regulations and GDPR.

Employee Screening and Searches

- Random or targeted physical bag checks and pat downs may be conducted upon entry/exit of secure areas.
- All searches must be conducted respectfully, with a same-gender staff member present and in a private setting.
- Refusal to comply may result in disciplinary action.

IT System Access and Monitoring

- Employees must use company-issued devices and accounts for all business activities.
- Access to internal systems is controlled through password and role-based security.
- IT usage is monitored for security threats, data breaches, or misconduct.
- Unauthorized access, file transfers, or use of external storage is prohibited.

Data Privacy and Confidentiality

- Personal and sensitive employee data collected for security purposes will be stored securely and only accessed by authorized personnel.
- Employees may request access to their personal security-related data under Thai PDPA and EU GDPR rights.

Incident Reporting and Investigation

- Security breaches, thefts, or suspicious behavior must be reported to the Security Manager immediately.
- Investigations will be conducted confidentially and fairly, in line with legal and HR procedures.

Awareness and Training

- All staff will be trained in this policy and site-specific security procedures during induction and annually thereafter.

This Security policy will be reviewed annually or upon significant legal, regulatory, or operational changes to ensure relevance and effectiveness.

Effective from 30 June 2025 onwards.



(Mr. Matthew James Triglone)

Managing Director

Announcement 7 /2025

Employment and Labor Management Policy

Jewelarc International Ltd. gives importance to and respects the human rights of all employees equally and to create a work culture that respects each other, can coexist on the basis of differences, no violent behaviors and no harassment. Harassment in various forms, included the company will conduct business with honesty, integrity, transparency, and not involve in any form of corruption. The company has announced terms of practice that are socially responsible in order for the operation to run smoothly and will take serious action according to various policies. The company has provided channels to receive complaints to monitor undesirable behavior, investigate incidents of violence, harassment and intimidation in the workplace to take corrective action without delay, and provide assistance and protection to those affected to the fullest and appropriate extent.

The Company's employment and labor management policies are set to be in line with human rights guidelines and standards. International in accordance with the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work, as well as the labor laws of the countries in which the Company operate, the principles based on international standards that the Company adheres to, the Company's management policies, and the Company's Code of Conduct. The Company prepares a document on employment conditions related to working hours and other working conditions and communicates them in writing to employees prior to commencing employment in a language that is understandable.

1. Working Hours Policy

The Company shall not allow employees to work longer than the law stipulates. The normal working week shall not exceed 48 hours. The Company shall provide employees with at least 24 consecutive hours of rest in every 7-day period. All overtime work shall be subject to consent. The Company shall not ask employees to work overtime regularly and shall pay all overtime at a special rate as stipulated by law. The total of normal working hours and overtime hours in a week shall not exceed 60 hours. Normal working, overtime work, and work on holidays shall clearly specify the start and end times of employees' work and shall not exceed the time of each type of work stipulated by law. The Company shall provide breaks during work and meal breaks, grant employees the rights to various leave days, vacation days, and other days as stipulated by law.

2. Compensation for Work Policy

The Company shall pay wages and compensation for work or overtime to employees fairly and not less than the minimum wage stipulated by law and shall provide employees with information on all wages and compensation received in each installment. It is in writing and can understand the details of the components and is on time as specified includes the benefits that workers are entitled to by law, and will not deduct employee wages unless it is an action that does not violate the law.

3. Termination and Compensation Policy

The Company complies with the Labor Protection Act B.E. 2541, which stipulates the duties of employers and the rights of employees in the event of termination as follows:

- The Company shall not terminate the employment of any employee without reasonable cause related to the employee's ability or behavior.
- The company will not terminate female employees due to pregnancy.
- Employees shall be notified prior to termination or shall receive no-notice pay and shall be compensated in accordance with the labor law, unless the employee has committed a serious misconduct.

4. Child Labor Policy

The Company will not employ or support the employment of children under the age of 15 years, and will not allow or support child labor between the ages of 15 and 18 to work in a job that is hazardous to health or in an environment that may cause harm to health, health and safety, and prohibits child labor from being employed to work overtime or on holidays.

Where child labor is found to be involved in any setting, the Company shall document the use of child labor and establish remedial processes that include steps to ensure the child's continued welfare, family status and rehabilitation, including removal of any child who is involved in child labor, and, in the case of children in compulsory education or attending school, adequate support shall be provided until the child completes compulsory education.

5. Forced Labor Policy

The company will not engage in or support the use of forced labor. This includes prison labor, contract labor, slave labor, or forced labor in all forms, including not forcing employees to work overtime, work on holidays, or work overtime on holidays, and not demanding or accepting security money, identity cards, or any identification documents from employees, whether upon entry into work or after they have been employed, or as a condition for employment, unless otherwise exempted by law, and not using physical punishment, or the threat of violence, or other forms of physical, sexual, mental, or verbal abuse, as a disciplinary or control measure.

6. Female Labor Policy

The Company will not allow female employees to work in a manner that is hazardous to their health or body as prescribed by law, and the Company will provide a safe and non-discriminatory working environment for pregnant employees. The company will not terminate, demote or reduce benefits of female employees due to pregnancy and will not conduct pregnancy tests before hiring female employees.

7. Foreign Labor Policy

The Company operates its business with ethics and responsibility, especially in hiring foreign workers, both the Company and its business partners, in accordance with the law, in terms of employment contracts, foreign work permits, wages and safe working conditions, in order to enhance the competitiveness of business partners and the Group of Companies to grow together sustainably.

8. Human Rights, Human Trafficking and Violence Policy

The Company strictly adheres to the human rights policy by conducting business with high ethics and responsibility, especially prohibiting all activities related to human trafficking. All employees are hired by voluntary employment, not by threat, kidnapping, coercion or intimidation. There is no use of physical violence or sexual abuse, no confinement or debt bondage, no payment of wages or outstanding wages, no restriction of freedom of movement, isolation, and no collection or seizure of any employee's identification documents, except for actions that are not against the law. The Company supports all employees to have a good working environment, from the time of employment until the termination of employment, as stipulated by law, to ensure that all employees are well taken care of according to the Company's policy.

9. Non-Discrimination Policy

The Company has a policy against discrimination. The Company prohibits discrimination based on gender, age, race, religion, disability, nationality, sexual orientation, or any other protected characteristic. Employment and promotion decisions are based on qualifications, experience, and merit. Including no health checks for employees or new employees for HIV, Hepatitis B, pregnancy tests. The company has assigned the HR and administration departments to oversee fair employment practices and will not interfere, obstruct, or take any action that affects the rights or practices of employees due to differences in nationality, religion, language, age, gender, marital status, personal attitudes on gender, disability, union membership, employee committee membership, political party preferences, or other personal ideas.

10. Harassment and Bullying Policy

The Company prohibits all forms of harassment, including sexual harassment and bullying. The Company promotes respectful working conditions and has measures in place to prevent employees from being harassed and bullied through words, gestures, physical contact, or other means, including violence against women. If employees are harassed or bullied, they can report it anonymously through the complaint channel. All reports will be taken seriously and investigated confidentially. The Company will take disciplinary action against those who violate the Company's work regulations strictly.

11. Freedom of Association and Collective Bargaining Policy

The Company shall respect the rights of employees and the freedom to join or not join associations, unions, federations, and groups for negotiations, and shall not obstruct the operations of labor unions or labor federations or obstruct employees' exercise of their rights to be members of labor unions, including providing facilitation and treating such representatives equally to other employees.

12. Diversity Equity and Inclusivity Policy

- Treat all personnel equally, respect diversity and differences, create a work environment that creates equality without discrimination, prejudice or any action that causes inequality.
- Respect differences in attitudes, cultures, beliefs, languages, races, nationalities, gender, sexual orientation, gender identity, abilities, health, social status, skills and other personal characteristics.
- Promote coexistence with personnel with both visible and invisible disabilities, including providing appropriate facilities for work for personnel with disabilities.
- Ensure the protection of the health, well-being and safety of all personnel. Equally
- Provide equal opportunities and take into account diversity in recruitment, application, selection and Hire personnel based on their qualifications, knowledge, skills and experience related to the job, without bias and without judgment based on individual characteristics.
- Consider issues of diversity and equality when providing benefits and welfare to personnel.

13. Health, Safety and Environment Policy

The employer provides a safe and healthy workplace to prevent accidents and health injuries arising from, related to or resulting from the operation of the employer's facilities. The employer takes responsible measures to mitigate the negative impacts the workplace has on the environment. In addition, the company will provide sanitary toilets and clean and hygienic drinking water. Factors of appropriate first aid, adequate and convenient places to eat.

14. Reporting Tips or Complaints Channel

The Company has established a whistleblowing or complaints system. The information shared by the employees is confidential. The company guarantees that there will be no retaliation for the employee's complaint. The company will protect the whistleblower by assigning the Operation Manager to open a channel for employees and stakeholders to report clues or complaints as follows:

14.1 Notify the direct supervisor.

14.2 E-mail to the Executive

- Operations Manager: oh@jewelarc.com.
- Human Resources and Admin: jeab@jewelarc.com, pron@jewelarc.com.

14.3 Notify by phone number 038-053-843

- **Ms. Oh** (Operations Manager) Extension 239, Mobile number 087-904-5665
- **Ms. Pron** (Human Resources and Admin) Extension 244, Mobile number 082-716-8269.
- **Ms. Jeab** (Human Resources and Admin) Extension 241, Mobile number 088-022-9672.

14.4 Send a letter to Jewelarc International Ltd.

No. 16/23, Village No. 1, Soi Lung Song, Samet, Mueang Chonburi, Chonburi Province 20000.

14.5 Suggestion box.

The company has set up the point of installing the comment box in the area where there is no CCTV camera and is confident that it is a convenient and private area for employees and stakeholders. The comment box has been installed as follows:

14.5.1 First floor, there are 2 locations: Male restroom (Lift side) and Female restroom (Lift side).

14.5.2 2nd floor at the coffee station (Lift side).

14.5.3 3rd floor at the coffee station.

15. Discipline and Punishment

The Company will not use inappropriate verbal punishment, physical punishment, or coercion or physical abuse against employees.

If an employee violates or fails to comply with the rules and regulations of this policy and causes damage to the company or employees including stakeholders, it shall be considered an offense. The consideration of punishment will be considered with fairness, taking into account the severity and nature of the offense as important. The authorized person shall punish in accordance with the company's work regulations.

16. Training and development

The Company provides training on this Policy to ensure that all employees understand their rights and responsibilities under this Policy.

This Policy will be reviewed annually as and when significant legal or organizational changes occur.

Effective from 30 June 2025 onwards.



(Mr. Matthew James Triglone)

Managing Director



Announcement 8 /2025

Occupational Health, Safety and Working Environment Policy

This policy affirms Jewelarc International's commitment to providing a safe, healthy, and compliant workplace for all employees, contractors, and visitors, aligned with Occupational Health and Safety Management System and Thai labor and safety laws. This policy applies to all operations, locations, and individuals working for or visiting Jewelarc International facilities.

The Company is committed to ensuring the health, safety and well-being of all workers and visitors. Workplace injuries and illnesses are prevented by complying with all relevant Thai occupational health and safety regulations and continuously improving health and safety performance through effective management systems.

Responsibilities

- Management: Ensure systems, resources, and leadership are in place to maintain a safe workplace.
- Supervisors: Monitor compliance, conduct inspections, and report incidents.
- Employees: Follow safety rules, report hazards, and participate in training.
- Contractors and Visitors: Must comply with Jewelarc International's WHS procedures.

Hazard Identification and Risk Management

- Conduct regular risk assessments of all work areas.
- Implement controls to eliminate or minimize hazards.
- Maintain a hazard reporting process for continuous improvement.

Training and Competency

- Provide safety induction training for all new staff and contractors.
- Deliver job-specific safety training and refresher courses.
- Keep records of all training completed.

Emergency Preparedness

- Maintain emergency procedures for fire, medical incidents, and natural disasters.
- Display evacuation maps and emergency contact information.
- Conduct drills at least twice per year.

Incident Reporting and Investigation

- All injuries, near misses, and unsafe acts must be reported immediately.
- Investigations will be conducted to determine root causes and corrective actions.
- Incident reports must be maintained and reviewed.

Personal Protective Equipment (PPE)

- Provide appropriate PPE for all tasks that require it.
- Ensure employees are trained in the correct use and maintenance of PPE.
- Replace damaged or expired PPE promptly.

Health Surveillance

- Conduct periodic health checks where required by risk or regulation.
- Maintain confidentiality of employee health records.

Monitoring and Review

- Perform internal audits, safety inspections, and performance reviews regularly.
- Review and update this policy annually or after major changes to operations.

Continuous Improvement

- Set WHS objectives and targets.
- Encourage employee feedback and participation in safety programs.
- Promote a proactive safety culture across all levels of the organization.

This Health and Safety policy will be regularly reviewed to ensure Jewelarc International continues to strive for the best practices.

Effective from 30 June 2025 onwards.



(Mr. Matthew James Triglone)

Managing Director

Announcement 9 /2025

Energy and Environmental Policy

This Policy outlines Jewelarc International Ltd.'s commitment to environmental protection, sustainable practices and continual improvement in accordance with Thailand's Environmental Management System and applicable environmental regulations. This Policy applies to all business activities, employees, contractors and stakeholders and all operations of Jewelarc International Ltd.

Environment Management

- Minimizing environmental impact from our operations.
- Complying with all applicable environmental legislation and standards.
- Preventing pollution and promoting resource conservation.
- Continually improving our Environmental Management System (EMS).
- Fulfilling our compliance obligations and environmental objectives.

Legal and Regulatory Compliance

- Comply with Thai environmental laws including those regulated by the Ministry of Natural Resources and Environment and the Department of Industrial Works.
- Adhere to international standards including ISO 14001: Environmental Management Systems.
- Ensure proper licensing and reporting for waste, emissions, and chemical usage.

Objectives and Targets

Jewelarc International will set measurable environmental objectives and targets that focus on:

- Reducing energy and water consumption.
- Minimizing waste and increasing recycling.
- Controlling hazardous substance use.
- Monitoring emissions and discharges.
- Enhancing environmental awareness across the workforce.
- Refer to our Environmental Performance Target Form in the Supporting Documents section.

Responsibilities

- Senior Management: Provide leadership and resources for environmental management.
- EMS Manager: Maintain and implement environmental system.
- Employees: Follow environmental procedures and report concerns or incidents.
- Suppliers and contractors: Must comply with our environmental requirements.

Waste Management

- Promote reduction, reuse, and recycling of materials.
- Segregate and dispose of waste responsibly.
- Comply with Thai hazardous waste management regulations (Department of Industrial Works).

Resource Efficiency

- Use energy-efficient equipment and practices.
- Optimize water usage and prevent wastage.
- Reduce paper and packaging consumption.

Communication and Training

- Conduct regular environmental training and awareness programs.
- Display environmental notices and emergency procedures.
- Communicate this policy to all staff, suppliers, and relevant stakeholders.

Monitoring and Review

- Conduct internal audits and inspections.
- Monitor performance indicators such as electricity use, waste volumes, and water usage.
- Review the policy annually to reflect changes in operations or regulations.

Continuous Improvement

Jewelarc International will actively seek new opportunities and technologies to improve environmental performance and support a sustainable future.

Effective from 30 June 2025 onwards.



(Mr. Matthew James Triglone)

Managing Director

Announcement 10 /2025

Chemical and Hazardous Substance Management Policy

This policy outlines Jewelarc International's procedures for the safe handling, storage, use, and disposal of hazardous chemicals. It ensures compliance with RJC Code of Practices, ISO 45001, ISO 14001, EU REACH regulations, and Thai hazardous substance laws. This policy applies to all employees, contractors, and visitors who handle, use, transport, or are exposed to hazardous chemicals at Jewelarc International premises.

The Company is committed to protecting its employees, communities and the environment from chemical hazards, managing chemicals in accordance with applicable laws and international standards, preventing leakage, exposure and contamination, and providing appropriate training and emergency preparedness.

Hazard Identification and Risk Assessment

- Maintain a register of all hazardous chemicals used or stored.
- Conduct regular risk assessments for chemical processes and tasks.
- Classify chemicals according to GHS standards and Thai regulations.

Labeling and Storage

- All containers must be clearly labeled with chemical name, hazard class, and handling instructions.
- Chemicals must be stored in segregated, ventilated, and secured areas.
- Incompatible substances must be kept apart.

Safety Data Sheets (SDS)

- Up-to-date SDS must be available for every chemical on site.
- Employees must be trained to interpret SDS information and follow prescribed precautions.

Handling and Use

- Use the appropriate PPE (e.g. gloves, goggles, respirators) based on SDS and risk assessments.
- Follow standard operating procedures (SOPs) for dispensing, mixing, or applying chemicals.
- Avoid decanting into unlabeled containers.

Waste Disposal

- Chemical waste must be collected, labeled, and disposed of by licensed hazardous waste contractors.
- Maintain DIW Form reports and REACH declarations where required.

Spill and Emergency Response

- Maintain spill kits and emergency eyewash/shower stations in relevant areas.
- Train staff in spill response, evacuation, and first aid procedures.
- Report and investigate all chemical incidents.

Training and Awareness

- All employees handling chemicals must receive chemical safety training annually.
- Safety signage, SDS access points, and PPE instructions must be clearly displayed.

Monitoring and Compliance

- Conduct regular chemical audits, inspections, and compliance reviews.
- Track chemical usage, storage volumes, and training completion.

This policy shall be reviewed annually or following significant incidents, regulatory changes, or process modifications.

Effective from 30 June 2025 onwards.



(Mr. Matthew James Triglone)

Managing Director

Announcement 11 /2025

Waste and Emission Management Policy

This policy outlines Jewelarc International's commitment to responsible waste and emission management, aligning with the Responsible Jewelry Council (RJC) Code of Practices, and European Union REACH regulations, as well as Thai environmental laws. This policy applies to all operational areas, including production, warehousing, offices, and subcontracted facilities. It covers hazardous and non-hazardous waste, air emissions, water discharges, and greenhouse gases.

Jewelarc International Ltd. is committed to preventing pollution and minimizing our environmental impact, managing waste and emissions responsibly throughout all processes, and promoting sustainable practices including waste reduction, reuse and recycling.

Waste Management Responsibilities

- Identify, classify, and segregate waste at the source.
- Label and store hazardous waste in accordance with Thai law and REACH requirements.
- Use only licensed waste handlers and treatment facilities.
- Maintain waste transfer records and regulatory reports such as Department of Industrial Works.

Emission Control Responsibilities

- Monitor air emissions, including volatile organic compounds (VOCs), particulate matter, and combustion gases.
- Maintain emission sources in compliance with Thai Industrial Emission Standards and ISO protocols.
- Control fugitive emissions from operations and equipment.
- Manage effluent discharges in accordance with regulatory water quality standards.

Materials and REACH Compliance

- Avoid use of REACH-restricted or SVHC-listed substances unless exempted and documented.
- Maintain a chemical inventory and Safety Data Sheets (SDS).
- Substitute hazardous materials with safer alternatives where feasible.

Monitoring and Reporting

- Regularly inspect waste storage and emission control systems.
- Record quantities and types of waste and emissions.
- Submit required reports to Thai authorities and, where applicable, to EU customers.
- Track progress against environmental KPIs and targets.

Training and Awareness

- Train employees on waste handling, spill response, and emissions management.
- Promote awareness of REACH obligations and Environment Management System.

Continuous Improvement

- Set measurable environmental objectives to reduce waste and emissions.
- Use audit findings and incident reviews to improve practices.
- Invest in cleaner technologies and process efficiency.

This Waste & Emissions Management policy will be regularly reviewed to ensure Jewelarc International continues to strive for the best practices.

Effective from 30 June 2025 onwards.



(Mr. Matthew James Triglone)

Managing Director

Announcement 12 /2025

Product Disclosure Policy

This policy defines how Jewelarc International Ltd. discloses accurate, complete, and compliant information about its products to consumers, business partners, and regulatory bodies. It aligns with RJC Code of Practices, EU consumer protection regulations, and Thai labelling and consumer laws. This policy applies to all product descriptions, labels, packaging, marketing communications, and technical data shared internally or externally.

Jewelarc International Ltd. is committed to providing clear and truthful information about the raw materials, treatments, origins and qualities of all products, free from misleading or false claims, and supporting ethical and informed consumer choices by complying with all relevant product disclosure regulations and standards.

Product Disclosure

- All product claims must be substantiated with appropriate documentation or test reports.
- Product information must include:
 - ❖ Metal content and fineness (e.g. 925 silver, 18K gold).
 - ❖ Gemstone type, treatment, and origin (if known).
 - ❖ Plating thickness or durability (e.g. micron gold, flash plated).
 - ❖ Synthetic, composite, or imitation material declarations.
 - ❖ Country of origin (for finished goods or components).
 - ❖ Special disclosures for coated, filled, lab-grown, or assembled items must be made clearly.

Labelling and Certification

- Labels must be legible, accurate, and compliant with local language and regulatory requirements.
- Products certified under third-party schemes (e.g. GIA, RJC, SMO) must include valid and current documentation.

Marketing and Advertising

- All advertising and promotional materials must reflect the same disclosure standards as product labels.
- Any promotional claim (e.g. “conflict-free,” “recycled gold”) must be backed by traceable evidence and approved wording.

Roles and Responsibilities

- Quality Assurance: Ensures product testing and accuracy of technical content.
- Marketing & Sales: Ensures correct application of claims and language.
- Compliance: Verifies that all communications meet legal and certification requirements.

Non-Compliance and Correction

- Any incorrect or misleading information must be corrected immediately.
- Customers and stakeholders must be informed if a significant mistake has occurred.
- Disciplinary action may be taken for deliberate misrepresentation.

Review and Continuous Improvement

This policy will be reviewed annually or in response to regulatory updates or product changes.

Effective from 30 June 2025 onwards.

JEWELARC


(Mr. Matthew James Triglone)

Managing Director

Announcement 13 /2025

Greenhouse Gas Management Policy

This policy outlines Jewelarc International's commitment to managing and reducing greenhouse gas (GHG) emissions in compliance with the Responsible Jewelry Council (RJC) Code of Practices, and global climate standards. This policy applies to all operations, departments, and supply chain partners of Jewelarc International, including manufacturing, transportation, procurement, and administration.

The Company recognizes the urgent need to address climate change and is committed to the following:

- Quantifying, monitoring, and reporting GHG emissions (Scopes 1, 2, and relevant Scope 3)
- Implementing emissions reduction strategies.
- Offsetting residual emissions through verified carbon initiatives or climate-positive projects.
- Engaging stakeholders and suppliers in emissions awareness and mitigation efforts.

Responsibilities

- Executive Management: Endorsement and resourcing of emissions goals.
- Environmental Officer: Lead monitoring, data collection, and reporting.
- Procurement: Select suppliers with verifiable sustainability records.
- Employees: Follow energy-saving practices and sustainability guidelines.

Monitoring and Reporting

- Annual GHG inventory using ISO 14064 or GHG Protocol methodology.
- Key Performance Indicators (KPIs) tracked monthly.
- External audit of data every 3 years or as required by RJC certification.
- Public disclosure in ESG or sustainability reports.

Continuous Improvement

- Establish and review science-based targets (SBTi-aligned if applicable)
- Upgrade to energy-efficient equipment and renewable power sources.
- Foster innovation in low-carbon production techniques.
- Encourage staff participation through training and awareness campaigns.

Non-Compliance

Failure to adhere to this policy may result in disciplinary action, supplier contract review, or mandatory retraining, depending on severity.

This policy shall be reviewed annually or upon significant changes in legislation, RJC standards, or company operations.

Effective from 30 June 2025 onwards.



(Mr. Matthew James Triglone)

Managing Director



Announcement 14 /2025

Land Rights Policy

Jewelarc International Ltd. has established this policy to demonstrate its commitment to respecting the land rights of communities, individuals, and other stakeholders. This policy ensures compliance with Thai laws, ISO 26000:2010 (Guidance on Social Responsibility), and international best practices. It promotes transparency, accountability, and respect for land-related rights throughout all business operations.

The Company shall strictly comply with all applicable laws, regulations and international standards relating to Thai land rights. Land shall be acquired only through legal, transparent and ethical procedures. The Company shall not occupy or use any land without the express consent of the legal landowner or legally authorized user.

1. The Company respects the rights and traditions of local communities, especially in operational areas. Land use activities shall not negatively impact community livelihoods, cultural heritage, or access to natural resources.
2. All land purchases and agreements shall be conducted fairly, transparently, and with the free, prior, and informed consent (FPIC) of affected parties. The Company will clearly disclose relevant information about land use plans, conditions of purchase, and any changes to stakeholders in a timely manner.
3. The Company is committed to using land in accordance with the principles of sustainable development. Operations must minimize negative environmental or social impacts and incorporate responsible natural resource management practices. Periodic audits and environmental/social impact assessments will be conducted to ensure ongoing compliance.
4. The Company maintains a transparent, confidential, and accessible grievance mechanism to allow communities, landowners, and other stakeholders to report concerns or disputes related to land use. All complaints shall be investigated promptly and resolved fairly.

Effective from 30 June 2025 onwards.



(Mr. Matthew James Triglone)

Managing Director