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Code of Practice - Responsible Jewellery Council

H.Y.M. International Co.,Ltd. Guidelines

H.Y.M. International Co.,Ltd. is a Thailand based Silvers and gemstones jewellery exporter. We recognize the importance of being a social responsible Silvers and gemstones jewellery exporter and has therefore agreed to conduct the practice code complying with the following guidelines of the Responsible Jewellery Council:

1. The executives will provide a demonstrated system that maintains awareness and ensures compliance according to relevant laws and/or responsibilities in relation to the Code of Practices - Responsible Jewellery Council (COP-RJC) guidelines for society.
2. The company will prepare all the written policies in compliance with the requirement of Responsible Jewellery Council (RJC) with endorsement by top management and implement all those practices among the policies within this manual, while also assigning the responsible person for implementation on such policies.
3. Provide the management system for all policies that have been announced as follows. This will have an identification and assessment of all risks within the implemented policies and establish due diligence procedures to ensure effective implementation of requirements. In this regard, communication is provided to employees and stakeholders directly informed and published to the public.
4. The company has to conducted a review at least once a year to assess the appropriateness, adequate, and sustainable of existing practices, while also taking steps to resolve any gaps to succeed in accordance with the policy.
5. Report the results of the above compliance at least once a year by communicating to the public and directly to stakeholders on regular basis.

The above guidelines will be adopted in the operation accordance with the company's policy announcement as follows:-



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Responsible Supply Chain Policy

1. H.Y.M. International Co.,Ltd. is a Trader and Exporter of silver jewellery. This policy confirms H.Y.M. International 's commitment to respect human rights, avoid contributing to the finance of conflict and comply with all relevant UN sanctions, resolutions and laws.

2. H.Y.M. International Co., Ltd. is a member of the Responsible Jewellery Council (RJC). As such, we commit to proving, through independent third-party verification, that we:

a. respect human rights according to the Universal Declaration of Human Rights and International Labour Organization Fundamental Rights at Work;

b. do not engage in or tolerate bribery, corruption, money laundering or finance of terrorism;

c. support transparency of government payments and rights-compatible security forces in the extractives industry;

d. do not provide direct or indirect support to illegal armed groups; and

e. enable stakeholders to voice concerns about the jewellery supply chain.

f. are implementing the OECD 5-Step framework as a management process for risk based due diligence for responsible supply chains of minerals from conflict-affected and high-risk areas.

3. We also commit to using our influence to prevent abuses by others. However, we will consider the potential of risks from non-compliance with the supplier's requirements with red flags. The supplier will be informed to take steps to reduce the existing risks as well as terminate business transactions Remedies to the effects that occur as well. This will do by the collected information through our grievance mechanism from stakeholders regarding materials procured from high-risk conflict areas.

4. Regarding serious abuses associated with the extraction, transport or trade of Silvers/coloured gemstones

We will neither tolerate nor profit from, contribute to, assist or facilitate the commission of:

a. torture, cruel, inhuman and degrading treatment;

b. forced or compulsory labour;

c. the worst forms of child labour;

d. human rights violations and abuses; or

e. war crimes, violations of international humanitarian law, crimes against humanity or genocide.

5. We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are committing abuses described in 4 or are sourcing from, or linked to, any party committing these abuses



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6. Regarding direct or indirect support to non-state armed groups

We will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring Silvers or coloured gemstones from, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates who illegally:

a. control mine sites, transportation routes, points where Silvers / coloured gemstones are traded and upstream actors in the supply chain; or

b. tax or extort money or Silvers /coloured gemstones at mine sites, along transportation routes or at points where Silvers/coloured gemstones are traded, or from intermediaries, export companies or international traders.

7. We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are sourcing from, or are linked to, any party providing direct or indirect support to non-state armed groups as described in paragraph 6.

8. Regarding public or private security forces

We affirm that the role of public or private security forces is to provide security to workers, facilities, equipment and property in accordance with the rule of law, including law that guarantees human rights. We will not provide direct or indirect support to public or private security forces that commit abuses described in paragraph 4 or that act illegally as described in paragraph 6.

9.Regarding bribery and fraudulent misrepresentation of the origin of Silvers/coloured gemstones

We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of Silvers/coloured gemstones, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of Silvers/coloured gemstones

10.Regarding money laundering

We will support and contribute to efforts to eliminate money laundering where we identify a reasonable risk resulting from, or connected to, the extraction, trade, handling, transport or export of silvers/coloured gemstones.

Human Rights Policy

1.The company will conduct its business with importance and respect to the law. Employees and executives must strictly comply with applicable laws.

2.The company will value and respect the human rights that are recognized internationally according to the laws, both in terms of basic guidelines and including rights in the workplace.

3.The company will not support and avoid human rights violations against others and will resolve any issues or impacts related to human rights consequences.

4.The company will seek to prevent or mitigate in related human rights consequences.



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5.The company will provide a process that represents due diligence process of identification, prevention, relief issues, and impact on Human Rights.

6.The company will be involved in considering the impact on Human Rights and rehabilitation through the legal process.

Due Diligence on Minerals Sourcing from Conflict- affected or High Risk Area.

1.The company will provide various policies to demonstrate responsibility in the mineral supply chain in order to comply with the OECD guidance (Organization for Economic and Cooperation Development), which consists of human rights policy, non-forced labour, non-worst forms of child labour, non-violence, abuse or immoral conduct, non-support of terrorism, unlawful treatment of individuals security, non-support money laundering, giving or accepting bribes or not paying taxes, against all kinds of crimes against humanity.

2.Provide risk identification and assessment in clause 1 above for the source of raw materials and high-risk areas according to the OECD criteria.

3.Provide procedures for improvement or development to reduce risk and consider the operation.

4.In case of inability to conduct risk assessment, the third-party audit method will be applied.

5.Provide reports and reviews in every year as well as communication to all stakeholders.

Anti-corruption, Bribery and Facilities Payment Policies

1.The company defines the meaning of corruption which is to give in any kinds of bribery by proposing, pledges, acceptances, induced to illegal acts in giving, pledge, claim, or accept any money, property or other improper benefits directly or indirectly, for a person to act or refrain to perform duties, which is to acquire or maintain business or recommend business to the Company, or to obtain or maintain any benefits that improper for business.

2.The company and all employees will conduct their business with honesty, integrity, transparency, and will not involve with any kinds of corruption; neither direct or indirect.

3.The company and all employees will not be neglected or ignored when an action that is deemed to be a corruption act has been found. The executives or the person who is in charge must be informed.

4.The company and all employees will not accept or pay gifts or other endorsements from any individual who conducts business with the company beyond necessity. Receiving gifts must not exceed the value of the stipulated traditional occasion, and must be noted and report to the executive.



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5.The company will establish a Whistle-Blowing Service channel for offences or complaints while encouraging employees and stakeholders to monitor. If any employee or stakeholder finds any action that misleads from the good governance principle, ethics, company regulations, illegal actions, and activities that violate the rights of stakeholders or may cause damage to the company, employees or stakeholders can report any wrongdoing, violation of rights of stakeholders, or any things that may cause damage to the company in such channels.

6.The company shall provide fairness and protection to any employee or whistle-blower who has reported or provided evidence in corruption related to the company, including employees who refuse fraudulent conduct, without reducing position, punishment, or negative consequences even if the company loses its business opportunity. The company will provide care and protection to the whistle-blower or an appropriate cooperate on the reporting of corruption.

7.The company will keep the complaint or the information involved with the complaint confidentially and will not disclosed it to other persons unless it is necessary in order to operate accordance to the regulations or in accordance to the law. If the information is disclosed, the company will take disciplinary action and/or acts in the law as the case may be.

8.In case of sufficient evidence that the complainant has behaved dishonestly or accused the alleged offender, the company will take action to protect the reputation of the alleged offender by considering disciplinary action, or if the complainant is a third party and the company is damaged, the company may continue to take legal action.

Policies on Anti-money Laundering or Financial Terrorism.

1.The company is committed to protect itself from being a part of the money laundering or financial terrorism support.

2.The company will document and apply the Know Your Counterparty (KYC) policy and procedures for business partners who are suppliers and customers with respect to silvers, coloured gemstones. Policies and procedures will :

(a) Identify of counter party by checking government-issued identification. Where triggered by a risk assessment or applicable law, establish the beneficial ownership and principals of the counterparty.

(b) Review and verify that the counterparty, and if applicable, their beneficial owners are not named on relevant government lists for individuals or organizations implicated in money laundering, fraud or involvement with prohibited organizations and/or those financing conflict.

(c) Maintain an understanding of the nature and legitimacy of their business.

(d) Monitor transactions for unusual or suspicious activity and report suspicions of money laundering or finance of terrorism to the relevant authority as applicable.



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(e) Maintain adequate records for either five years minimum or as long as required by national legislation, whichever is longer.

3.The company shall nominate an individual to be responsible for implementing the KYC policy and procedures.

4.The KYC's policies and procedures will be up to date and appropriate, including training procedures of documentation and regular reviews as usual.

5.The company will record all cash transactions or obvious links or cash-like transactions equal to or greater than 10,000 EUR/USD or the criteria set by applicable law (whichever is lower) as required by law. Members must report such transactions to the relevant assigned authorities.

Security Policy

1.The company will assess the security risks and set up the standards to protect employees, contractors, visitors, and employees employed by related business partners, for stealing the product, damage or replacement of the product in the workplace or during exhibitions and delivery.

2.The company will ensure that all security personnel respect the human rights and dignity of everyone and will strictly use force only as necessary and at the minimum against threats.

Labour Management Policy

The company defines labour management policies by setting out the details in the Company's Working Regulations.

1.The company will provide employment conditions relating to wages, working hours and others by defining in the working regulations, and inform to employees.

2.The company will not avoid complying with labour and social security laws.

3.The company will keep appropriate employees records, including payment, total wages, working hours, overtime hours.

4.The company will comply with labour law by requiring employees to have a normal working time of not more than 48 hours a week.

5.Overtime may occur with the consent of an employee under the labour law and will not be enforced, threatened to terminate or be forced to accept or quarantine or punishment for not working overtime.

6.The total number of hours of work and overtime will not be over 60 hours per week, unless there is an agreement together or in exceptional circumstances such as peak production period or during an accident or emergency, which must be given the consent of the employee and appropriate equipment is required to protect the health and safety of the employee.



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7.The company will arrange a weekly rest day at least 1 day per week, as defined in the working regulations.

8.The company will arrange for traditional holidays and leaves, including maternity leaves, annual holidays, which will be paid according to the law, as defined in the working regulations.

9.The company will arrange annual holidays in accordance with the labor law which will be paid.

10.The company will pay the employee not less than the minimum wage rate as required by law.

11.Overtime pay arrangement will not be less than as required by law.

12.The company will arrange payment according to the methods and periods set forth in the Work Regulations.

13.The company will not deduct employee wages unless it is permitted by law.

14.The company will not force employees to purchase food or other services from the facilities provided to employees without choice.

15.The company will not pay advance wages, and the payment is subject to the law.

16.All kinds of violence and harassment in the workplace are prohibited, including no physical punishment. Acts of vilification or shame, sexual harassment, physical abuse, psychological abuse, verbal or sexual discrimination, interaction and intimidation, whether direct or indirect in any form are prohibited in the workplace. Employees must be treated with respect, honor, not under threat or violence or threaten against employees, family or colleagues.

17.The communication of the disciplinary process, disciplinary procedures, and the equal treatment of employees, which is defined in the working regulations, have to be informed to the employee.

Policy of Worst Form of Child Labour.

1.The company will not participate in or support child labour as set out in the ILO Convention, the 138th meeting and recommendation 146, which imposes a minimum age for basic work at 15 years old, so that children can complete compulsory studies.

2.The company will not participate in or support child labour in the worst form as defined in the International Labor Organization Convention, the 182nd meeting and recommendations from the 190th meeting, which includes:

1) The use of child labor in harmful ways by its nature or circumstances which is likely to be harmful to health, safety, or morality in people younger than 18 years old.

2) All forms of child slavery and practices similar to slavery, including debt, child trafficking, forced child labor, and the use of children in combat.



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3.If any place of child labor is found, the company will document the use of child labor and provide a healing process that includes the ongoing welfare process of the child, and consider family status and rehabilitation, including the withdrawal of children participating in child labor, and in case of the child is subject to compulsory education or attends school, adequate support must be provided until compulsory graduation.

Non-Forced Labour Policy

1. The company will not participate in or support forced labor, including binding, bonded, or involuntary labor, as defined in the 29th meeting of the International Labor Organization Convention.

2. The company will ensure that all employees work in voluntary situations, by:

1) Not limiting the freedom to move or the movement of employees in the workplace in an inappropriate area.

2) Not confiscating or hold employee's documents, such as ID card, work permit.

3) Not recruiting employees by fraudulent means or require employees to pay all or some money, property, or fees for personnel recruitments. If the employee is paid, it must be reimbursed.

4) Not suspending any part of the salary, benefits, or property of employees to force employees to continue their work, unless the suspension of wages or benefits is imposed by labor law.

5) No measures to prevent employees from terminating, after the notification is made at the appropriate time required by law.

3. The company will not engage in or support human trafficking or fraudulent recruitment by any means and/or binding employees to work, by communicating this requirement clearly to the recruiter, agent or service provider that employees work for, and have to review their relationship and to resolve the negative impact on human rights.

Policy on Freedom of Association and Negotiation

1. The company will respect the rights of employees to gather independently in the organization they choose without interference or negative consequences. The company must ensure that employees who wish to register or join their chosen organization are not threatened in any form.

2. The company will respect the rights of employees to negotiate together and will adhere to the negotiation in the agreement. The company will participate in negotiations under the law, which is based on the principle of honesty in the negotiation.

3. In case that the law limited the right of freedom to association and negotiation. The company will not obstruct alternatives choices under the Law.



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Non-discrimination Policy

The company will not implement or discriminate in any form in the workplace, in the terms of employment, the continuous work, payment, overtime, access to training, professional development promotion, termination, or retirement, which includes discrimination based on race, skin color, ethnicity, caste, national origin, religion, disability, or genetic basis, gender, sexual orientation, union membership, popularity politics, marital status, parent or pregnancy situation, physical appearance, HIV status, age, or other natural personal characteristics, which is unrelated to job requirements. The company will ensure that anyone who is 'fit to work' will receive equal and non-discriminatory opportunities on the basis of factors unrelated to their ability to perform tasks.

Safety & Occupational Health Policy

1.The company will provide safe and healthy working conditions for all employees in accordance with applicable laws and other relevant industry standards.

2.The company will also provide and maintain the workplace and accommodation in the relevant premises.

2.1 Safe and accessible drinking water.

2.2 Hygiene facilities for eating and storing food.

2.3 The cleaning facilities and clean toilets correspond to the number and gender of the employee.

2.4 Fire safety equipment and alarms.

2.5 Clearly unlock mark, unlock emergency exits and escape routes.

2.6 Access to enough power supply and emergency light.

2.7 Suitable conditions for pregnant women or nurses or alternative work arrangements to avoid improper workplaces.

3. The company must assess the risk of harm in the workplace and take control to reduce the risk of accidents and injury to employees. Risk assessment scrutinizes the dangers associated with the activities and products of members, including the use of machines and mobile devices, in the case of involving the storage and management of chemicals, consisting of cleaning materials, excessive exposure to smoke, air borne particles, noise levels, and temperature and/or lighting and insufficient ventilation, residues from repetitive activities, considerations for workers under the age of 18 and pregnant women, and general hygiene and housekeeping issues.

4. The company will arrange the Health and Safety Cooperation Board to pick up and discuss about health and safety issues with management.

5. The company will provide training and information about health and safety to employees in the ways and languages that they can understand. It includes training and information about:



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5.1 Determining various roles related to health and safety hazards and procedures for specific controls.

5.2 Appropriate action, in case of an accident or emergency.

5.3 Fire and emergency safety procedures.

5.4 First Aid Training for assigned employee representatives.

5.5 The rights and responsibilities of workers to strike, or refuse to work in situations where there are uncontrollable hazards, and demonstrate these situations immediately to those who are near risk and to the management authority.

6. The company will provide appropriate personal protective equipment (PPE) for free of charge and ready to wear, or appropriate caution.

7. The company will provide adequate access to first aid benefits in workplace, as well as trained first aid personnel. There is an appropriate process of transferring to the local medical facility, in case of medical emergencies and assist the operator who injure from work to access medical care in accordance with the laws of the country and the company's policies.

8. The company will prepare emergency procedures and evacuation plans for health and safety with reasonable expectation and appropriateness in case of emergencies. These must be accessible or clearly displayed, tested regularly (including through evacuation drills) and updated periodically.

9. The company will investigate health and incidents, and provide presentation of results for review of related hazard control, as well as identifying opportunities for improvement.

10. The company will not use Silvers containing cobalt.

Environmental Policy

1. The company will comply with the relevant environmental regulations, rules and laws.

2. The company will prevent or take any action to reduce environmental impact to the surrounding society.

3. The company will operate, manage, take action, improve, review and develop in related areas, as well as cultivate environmental consciousness effectively.

4. The company will encourage the conservation of resources by using 3R principle (Reduce, Reuse, Recycle) in the best benefits of the organization.

5. The company will provide environmental and energy conservation knowledge to employees, executives and others whom may concern.



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Hazardous Substances Relevant Policy

1. The company will maintain an inventory of hazardous substances at the facilities. Safety data sheets (or equivalent) will be accessible wherever hazardous substances are used and their associated risk will be clearly and actively communicated to all employees who work with them.
2. The company will not manufacture, trade or use chemicals and hazardous substances subject to international bans. Any hazardous substances subject to international phase-out will not be manufactured or traded and their use will be phased out in accordance with the regulation.
3. Wherever technically feasible and economically viable, the company will use alternatives to hazardous substances in the processes.

Natural Resources Policy

The company will support the conservation of various resources by using the 3R principles (Reduce, Reuse, Recycle) for maximum benefit to the organization.

In order to achieve this system which will make the business sustainable, we hereby announce to all employees and adheres to the common practice.

Effective date : November 12 , 2022

(Mt. Yais Hayman)
Managing Director



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Product Disclosure Statement

Part 1 Product Disclosure Proclamation

This product disclosure terms are designed to give those involved an understanding of what is needed in products, or the qualifications as required by law to ensure the decision to take action relating to the Company's products. The product disclosure requirements provide general information to those involved in the product's qualifications to consider appropriate action for the purpose.

Part 2 Product Disclosure Requirements

This given message is an insurance policy of the Company regarding Jewelry products which is written in ordinary term in order to achieve a consistent understanding, as follows:

1. Silver : The purity of silver are properly disclosed. Details or content must be equally clear, such as the words "silver" or any abbreviations, sign used must comply with applicable laws or industry standards.
2. Plating: The use of silver as plating materials must be properly disclosed. Descriptions of plating and purity, or the texture of materials used must be expressed equally clearly, such as the word "silver" or abbreviation letters.
3. Treated: Treated thermal colored gems are revealed as 'treated' or referred to specific treatment methods. Description must be equally clear, such as the name of the colored gemstone. Any special care requirements that treated must be disclosed.
4. Synthesis: All or part synthetic colored gems must be revealed as 'built by laboratories', 'formed by laboratories' and/or 'synthetic'. Description must be equally clear, such as the name of the colored gemstone.
5. Composite: The company will disclose the composite (or assemble up) of colored gems made from two or more parts as 'composites', 'assembled up', 'assemble up a pair' or 'assemble up three parts' and by the correct name of the material that consists. Description must be equally clear, such as the name of the colored gemstone used.
6. Rebuilding: colored gems that are recreated will be disclosed and the description must be equally clear. It is clearly as the name of the colored gemstone.
7. Replication (imitation): Any artificial products used to mimic the appearance of diamonds or colored gems without using chemical elements, their physical qualification and/or their structure are revealed as 'imitator' or 'simulated up'. The name of the material along with the correct contained elements such as 'compound x', 'glass', 'plastic' description must be clear equally noticeable as the name of the colored gemstone.



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8. Description of gemstone grinding: explaining the size or weight of carat, color, contrast, or the grinding of colored gems and the quality of colored gems, followed by acceptable guidelines that are suitable for the scope.
9. When explaining the origin location of the colored gemstone: What information to consider? To disclose the place of origin is used only when it represents the geographical area where the gem is excavated.
10. Any relevant health and safety information about the material specified used in jewelry products sold by members must be disclosed.



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Announcement Management representative in implement COP-RJC

According to H.Y.M. International Co., Ltd. has a responsible enterprises policy, so that there are personnel who have responsible for preparing procedures that must be implemented and monitored (Due Diligence) RJC to ensure consistency in system preparation. The person with the following :-

Miss Kobkaew Buntivortai

Person whom assigned above having the functions following :

- 1.Contact partners for achieve an active cooperation in the preparation of the system in order to understand the preparation of various procedures for responsibility in the supply chain, to ensure transparency and controllable.
- 2.Identify and assess the risk of the accountability system in the supply chain system.
- 3.Design and place responsive strategies in the supply chain system.
- 4.The review was conducted by an independent third party for the process of practices that indicate that risk is in order to achieve transparency.
- 5.The report follows the procedure stipulated in entrepreneurship practices responsible for the supply chain and is reviewed at least once a year.

Effective date : November 12 , 2022

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(Mr. Yais Hayman)
Managing Director



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Grievance Mechanism

H.Y.M. International Co.,Ltd. has established this grievance procedure to hear concerns about circumstances in the supply chain involving Silvers and coloured gemstones from conflict-affected and high-risk areas.

Miss Kobkaew Buntivortai, Sale and marketing Manager is responsible for implementing and reviewing this procedure. Concerns can be raised by interested parties via email or telephone to:

Miss Kobkaew Buntivortai

H.Y.M. International Co.,Ltd.

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e-mail :- sales@jewelry-co.com

On receiving a complaint, we will aim to:

- Get an accurate report of the complaint.
- Explain our complaint procedure.
- Find out how the complainant would like it addressed/resolved.
- Assess the eligibility of the complaint and, where applicable, decide who should handle it internally. In cases where we are unable to address the complaint internally (e.g. where our company is too far removed from the origin of the issue raised in the complaint), we may redirect it to a more appropriate entity or institution, such as the relevant supplier or industry body.
- Where the issue can be handled internally, seek further information where possible and appropriate.
- Identify any actions we should take including hearing from all parties concerned, and monitoring the situation.



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- Advise the complainant of our decisions or outcomes.
- Keep records on complaints received and the internal process followed, for at least five years.

Effective date : November 12 , 2022

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(Mr. Yais Hayman)
Managing Director