

POLICY STATEMENT

To Employees and Significant Business Counterparties of Camex Jewellery Limited on Responsible Business Practices

We, Camex Jewellery Limited (“Camex”), have become a certified member of Responsible Jewelry Council (“the RJC”) and are committed to operating our business in accordance with the 2019 Code of Practices as stipulated by the RJC (“COP”). Our significant policies as highlighted below and briefly explained in the annex are based on the responsible business practices required by the RJC. We strictly adhere to these policies and will make every effort to work with all our employees and business counterparties to ensure our compliance with the standards set out in the COP. We share these policies with our employees and business counterparties in the truly expectation of their meeting to the responsible business practice requirements under the COP for our mutual benefits of trade business.

Camex’s Significant Policies of Business :

Comply with the relevant international laws and industry regulations when sourcing our raw materials or products and insist on written guarantees from suppliers that their materials or products supplied to us conform with international regulations on genuineness, quality standard and legitimate source; Maintain track records for the raw material or product sourced;

Maintain “know your counterparty” principle based system to identify, decline and report unusual or suspicious activity triggering risk of offences against applicable local or international laws on money laundering and finance of terrorism; Respect human rights in the process of recruitment, employment and training of employees. Ensure equal opportunity, non-discrimination nor harassments, and freedom of association and collective bargaining to all the employees;

Provide and maintain workplace safe and healthy for employees in compliance with applicable local laws and regulations of occupational health and safety for ensuring ongoing quality and production efficiency;

Comply with all applicable environmental protection laws and minimize the adverse impact of the manufacturing or operational process on the environment and the local community; Promote environmental protection by raising the employee’s awareness of resources saving and efficient use of energy and water;

Prohibit any and all forms of corruption, extortion, embezzlement, bribery, kickbacks, gifts including any payments or other forms of benefits conferred on any government official for the purpose of influencing decision making in violation of law or against the company’s interest.

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(1) ABOUT RESPONSIBLE JEWELLERY COUNCIL POLICY

Camex Jewellery Limited ("Camex") has become a Certified Member of the Responsible Jewellery Council (the "RJC"). The RJC is an international, not-for-profit standards-setting organisation that has been established to advance responsible ethical, social and environmental practices, which respect human rights, throughout the gold, silver, platinum group metals, diamond and coloured gemstones (rubies, emeralds and sapphires) jewellery supply chain, from mine to retail. The RJC has developed a benchmark standard for the jewellery supply chain and credible mechanisms for verifying responsible business practices through third party auditing. As a RJC certified Member, Camex commits to operating its business in accordance with the RJC Code of Practices. Camex commits to integrating human rights, ethical, social and environmental considerations into its day-to-day operations, business planning activities and decision making processes. For more information about the RJC, please visit the following website: <http://www.responsiblejewellery.com>

(2.1) RESPONSIBLE SUPPLY CHAINS

PRODUCT DISCLOSURE

Camex shall not make any untruthful, misleading or deceptive representation, or make any material omission in the selling, advertising or marketing of any diamonds, treated diamonds, synthetic diamonds or diamond simulants, and/or any coloured gemstones (rubies, emeralds and sapphires) and/or synthetic, imitation, treated, artificial, reconstructed or composite coloured gemstones, and/or any gold, and/or any platinum group metals ("PGM") and/or silver material /jewellery products. Camex shall comply with applicable law, regulations and internationally accepted standards

when disclosing information on the following materials of different physical characteristics used in Camex's products of sales with conspicuous descriptions : diamonds, treated diamonds, synthetic diamonds and diamond simulants; coloured gemstones (rubies, emeralds and sapphires) and synthetic, imitation, treated, artificial, reconstructed or composite coloured gemstone; and gold, PGM and silver. Camex shall prohibit the use of hazardous alloying material(s) or/and diamond/coloured gemstones which have been irradiation treated to ensure production of non-hazardous jewellery product to customers.

GOLD, SILVER and PGM

All supplies of gold, silver and PGM used in Camex's production shall be conflict free. The refineries of all the gold scraps from the manufacturing process shall be done by the Approved Gold Refiners. Quality accreditation certificates or written guarantee of precious metal suppliers and the transaction documents such as delivery notes, bar certificates and invoices shall be fully documented and maintained.

DIAMOND

All of Camex's diamonds shall be acquired from legitimate sources which have no involvement in funding conflicts. Camex shall prohibit knowingly buying or selling conflict diamonds or assisting others to do so. (Camex does not involve in the international trade of rough Diamonds.) Camex shall keep records of all Kimberley Process certificates (if applicable) and shall adopt the World Diamond Council System of Warranties to ensure that all diamond invoices contain the following affirmative statement or equivalent wording which provides the same warranty: "The Diamonds herein invoiced have been purchased from legitimate sources not involved in the funding of conflict and in conformance with United Nation resolutions. The seller hereby guarantees that these Diamonds are conflict free, based on personal knowledge and/or written guarantees provided by the supplier of these Diamonds." Camex shall maintain awareness of and comply with applicable international and national sanctions that prohibit transactions involving Diamonds with targeted individuals, entities or organizations. Camex shall from time to time inform or update all the employees who buy or sell diamonds about government policies and legal requirements on the trade in diamonds and world association/union resolutions and regulations including but not limited to, the Kimberley Process Certification Scheme and the World Diamond Council System of Warranties.

COLORED GEMSTONES

Camex shall adopt policy same as for Diamonds on certification of country of origin to ensure ascertainment of genuineness and origin of mining and cutting of colour gemstones (rubies, emeralds and sapphires) for the purpose of proper information disclosure in the sales invoice. All the transaction documents and records for the import and export of the coloured gemstones including those subject to international or national sanctions shall be kept and maintained and be made available to the government authorities upon request.

(2.2) MONEY LAUNDERING AND FINANCE OF TERRORISM

To combat money laundering and finance of terrorism, Know Your Counterparty principles shall be adopted by Camex to establish the identity of all organisations with which Camex deals, to have a clear understanding of their business relationships and to have a reasonable ability to identify and react to transaction patterns appearing out of the ordinary or suspicious. Camex shall apply "Know Your Counterparty" principles for all Business Partners that are suppliers or customers of diamonds, treated diamonds, synthetic diamonds and diamond simulants; coloured gemstones (rubies, emeralds and sapphires) and synthetic, imitation, treated artificial, reconstructed or composite coloured gemstone; and gold, PGM and silver, and/or Jewellery Products containing these, including: Establishing the identity, and where triggered by a Risk assessment or Applicable Law, the beneficial ownership and principals of the supplier or customer; Maintaining an understanding of the nature of their business; Monitoring transactions for unusual or suspicious activity and reporting suspicions of money laundering or finance of terrorism to the relevant designated authority.

(2.3) LABOR AND HUMAN RIGHTS

Camex is committed to developing an organizational culture in support of internationally recognized human rights and seeks to avoid complicity in human rights abuses. Camex persists in the principles contained within the United Nations Human Rights – Guiding Principles on Business and Human Rights. With the principles in mind, Camex sets policy to identify, prevent, and mitigate adverse human rights impacts resulting from or caused by the Company's business activities before or if they occur, through human rights due diligence and mitigation processes. Camex encourages all the business counterparties to uphold the principles in this Policy and to adopt similar policies within their businesses.

Employment & Remuneration

Employment shall be freely chosen. Workers shall not be required to lodge “deposits” or their identity papers with Camex and shall be free to leave with reasonable notice. There shall be no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation. Working conditions shall be safe and hygienic. Working hours including overtime shall not be excessive. Working hours shall comply with national laws and benchmark industry standards, whichever affords greater protection. All employees shall have at least one rest day in seven consecutive working days unless permitted under a Collective Bargaining Agreement and/or Applicable Law that allows for work time averaging including adequate rest periods. All employees shall be provided with all local legally mandated public holidays and leave. Wages and benefits pay for a standard working month, calculated according to local legally mandated calculation basis, shall meet local statutory minimum wage level before overtime and shall be paid to employees by bank transfer, in cash or cheque form within the time frame as required by local labor law. All employees shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time they are paid. Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures shall be recorded.

Forced Labor

Camex shall prohibit the use of all forms of forced or involuntary labor, including indentured labor, slave labor, prison labor and any form of human trafficking. Camex support in ILO Convention 29.

Child Labor

Child labor shall not be used in the company operation. The term “Child” refers to a person below a certain minimum age as determined by local laws and regulations. Camex shall support legitimate workplace apprenticeship programs that comply with all laws and regulations applicable to such programs. Camex support the ILO Convention 138 and Recommendation 146 and in ILO Convention 182 and Recommendation 190.

Safe and Healthy Workplace

Camex shall provide and maintain a workplace and any work-related circumstance outside the workplace free from the happenings or threats to the employees of unfair treatment, humiliation, violence, sexual or other harassment, verbal or physical abuse, harsh or inhumane treatment, any form of intimidation and any other unsafe or disruptive conditions. These principles shall apply not only to the employees but also to the business associates with whom Camex works. Camex shall provide a safe and healthy working environment in compliance with relevant legal or industry requirements for all the employees and on-site contractors with aims to minimize the risk of accidents, injury and their exposure to health risks. With identification of hazards and remediation of health and safety issues from time to time, Camex is committed to continually improving health and safety conditions in the workplaces.

Freedom of Association and Collective Bargaining

Camex shall respect all employees' right to join, form or not to join a labor union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognized union, Camex shall establish a constructive dialogue with their freely chosen representatives and shall work on the bargaining affairs in good faith with such representatives. Camex shall establish different effective channels for all the employees to communicate their concerns under this policy and to report a potential violation of this policy, if any. All these concerns or report shall be reviewed, investigated if required, and responded with appropriate action. Camex is committed to making every effort to maintain confidentiality of such communications without any reprisal or retaliatory action taken against the employee raising such concerns or report.

(2.4) HEALTH & SAFETY

It is the policy of Camex to make health & safety issues top priority throughout the Company's business and to recognize that health and safety management as an integral part of the Company's daily operations.

Camex sets up a Health & Safety Committee, which is responsible for the planning and management of health and safety issues and reports directly to the top management. Through implementation, supervision and regular review of this policy, Camex aims to continually improve their occupational health & safety performances by building up high level of health and safety awareness to the employees and on-site contractors during working hours in accordance to occupational & health ordinances and regulations of the industry. Camex ensures that safe and healthy working conditions

are provided for all the employees and on-site contractors in the workplaces in accordance with Applicable Law and other relevant industry standards:- Access to clean & hygienic toilet facilities, safe & accessible potable drinking water, and if appropriate, sanitary facilities for food storage shall be provided. A safe and hygienic working environment shall be provided, bearing mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment. Appropriate Personal Protective Equipment shall be provided free of charge to employees. Employees shall receive regular and recorded health and safety training and information update so that they shall be competent to carry out their health and safety duties and responsibilities in order to ensure all employees' own health and safety at work and to contribute their greatest effort in preventing any accident occurrence. Workplaces shall be facilitated with proper fire safety equipment and alarms with clearly marked, unlocked and unblocked emergency exits, escape routes and emergency lighting. Adequate on-site health and medical facilities, including clearly marked first aid provisions and trained first-aid personnel, shall be provided with appropriate procedures in place for transportation to local medical facilities in the case of a medical emergency. All Health and Safety incidents shall be recorded and investigated. The results shall be fed into reviews of the controls of related Hazards to identify opportunities for improvement.

(2.5) Environmental Protection

The management of Camex are committed to improving and enhancing environmental performance by: Working with the community as a whole and in association with all staff and business counterparties to conserve natural resources and preserve the quality of the environment in which Camex operates; Conforming to all relevant environmental legislative and regulatory requirements; Identifying significant environmental risks and implementing appropriate control measures to prevent significant environmental impacts or minimize & mitigate identified environmental risks; Maintaining an inventory of hazardous substances at Facilities with Safety Data Sheet easily accessible by trained employees and contractors when in use. Camex shall use substitutes to hazardous substance in business processes wherever technically and economically viable and shall never use chemicals and hazardous substances subject to international bans; Identifying significant wastes and emissions to air, water and land generated in the business processes and discharging or disposing wastes and emissions in compliance with Applicable Law or prevailing international standards;

Reducing waste, and reusing or recycling products wherever practicable; Recognizing energy and water consumption as significant natural resources and seeking energy and water efficiency initiatives to reduce the wasteful use of these key resources; Ensuring all the staff well-trained with the environmental policy and encouraged to identify potential environmental improvement initiatives. Camex shall regularly monitor and review the control system and procedures and work out resolutions to continually improve environmental performance.

(2.6) BUSINESS ETHICS

Anti-Bribery & Facilitation Payment Policy

It is Camex's policy to conduct all of the business in an honest and ethical manner. Camex shall take a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all business relationships and dealings by implementation and enforcement of effective systems to counter bribery. There are no exemptions for facilitation payments within the Company of Camex. Any form of advantage shall be assessed according to the elements of the offence under the legal requirements. Camex shall support anyone who raises genuine concerns in good faith under this anti-bribery policy, even if they turn out to be mistaken. Camex is committed to ensuring no one shall suffer from any detrimental treatment, such as dismissal, disciplinary action, threats, or other unfavorable treatment, as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. This policy applies to all individuals working at all levels and grades including management staff, employees (whether permanent or temporary), consultants, contractors, casual workers or any other person associated with Camex.

Confidentiality Policy

Camex places a high priority on the protection of confidential information in order to protect the privacy of its business associates and employees with respect to the Hong Kong Personal Data (Privacy) Ordinance, and the integrity of the Company. Confidential Information shall only be accessible to those who are authorised to have access to the information.

This policy applies to all directors, officers, employees, contractors and consultants.

Confidential Information includes :

- commercially sensitive information ;
- all in-house financial data of status and analysis;

- all in-house operational manual and documentation
- all information in correspondences and contracts or agreements (draft or concluded) with business associates
- personnel records of Camex's employees or any other information of a personal nature;
- Any other information that is provided in confidence, or would be reasonably considered to be confidential based on generally accepted ethical and business practice

All directors, officers, employees, consultants and contractors who are in possession of Confidential Information shall ensure that they:

- are authorised to have access to the information; and
- take all reasonable actions to protect the security of the information, commensurate with the sensitivity of the information.

No person who is in possession of Confidential Information shall be subjected to pressure or intimidation to disclose the information to another party if they have reasonable grounds to believe that the other party is not authorised to receive the information. If a person acquires unauthorised access to Confidential Information, they shall take immediate steps to delete or destroy the information, prevent any continued access to it, and, where applicable, inform the provider of the information that it was received without authorisation and has been deleted or destroyed. Any person who deliberately or negligently contravenes this policy may be subject to disciplinary action.

Approved by :



Date: 01/07/2020