



Responsible Jewellery Council (RJC) Code of Practice (COP) Manual

Applied To:

- Continental Jewellery (Mfg) Ltd
- Continental Jewellery (Jiangmen) Co. Ltd

Latest version: June 2026

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1. COMPANY PROFILE

1.1 Introduction

Continental Jewellery (Mfg) Ltd. ("Continental") is a jewellery design, manufacturing and wholesale distribution industry engaged in the manufacture, assembly, sales and export of jewellery products, including diamond-set jewellery, gemstone jewellery, gold jewellery and related products.

We are committed to conducting business responsibly and ethically throughout its operations and supply chain in accordance with the Responsible Jewellery Council (RJC) Code of Practices (COP).

1.2 Scope

This manual has been established to:

- Demonstrate compliance with RJC COP requirements
- Provide a documented management system framework
- Define responsibilities and controls
- Protect human rights and employee welfare
- Promote ethical business practices
- Manage environmental impacts
- Support continual improvement

This manual applies to all employees, temporary workers, contractors, suppliers and business partners associated with Continental.

1.3 Company Values

Continental operates according to the following core principles:

Integrity

Conduct business honestly and transparently.

Respect

Respect employees, customers, suppliers and communities.

Responsibility

Conduct operations responsibly to minimize social and environmental impacts.

Excellence

Pursue continual improvement in business performance and sustainability.

Compliance

Comply with all applicable legal, regulatory and customer requirements

2. GOVERNANCE & ETHICAL BUSINESS PRACTICES

2.1 Management Commitment

Continental is committed to conducting all business activities with integrity, transparency and accountability. Our Management shall provide adequate resources to implement and maintain the RJC Management System.

2.2 Business Integrity

Continental shall:

- Conduct business honestly and ethically.
- Comply with all applicable laws and regulations.
- Maintain accurate records.
- Avoid conflicts of interest.
- Protect company assets.

2.3 Anti-Corruption Policy

Continental adopts a zero-tolerance approach to bribery, corruption, fraud, and unethical business practices. All employees must act with integrity, honesty, fairness, and transparency in their daily work. Employees must not offer, solicit, or accept improper gifts, payments, favors, or other benefits that may influence business decisions.

Any actual or potential conflict of interest must be promptly disclosed to management. Accurate records and business documents must be maintained at all times. Employees are required to comply with all applicable laws and regulations and report any suspected misconduct through Continental's Whistleblowing Policy.

2.4 Whistleblowing Policy

We are committed to maintaining a workplace built on integrity, transparency, and accountability. Employees, suppliers, customers, and business partners are encouraged to report any suspected misconduct, including fraud, bribery, legal violations, safety concerns, misuse of company resources, or unethical behavior.

Continental will treat all reports seriously and confidentially. Individuals who report concerns in good faith will be protected from retaliation, discrimination, or unfair treatment. All reports will be reviewed and investigated as appropriate. Employees are encouraged to speak up promptly to help maintain a safe, ethical, and responsible workplace.

2.5. Complaints & Grievance Policy

We are committed to providing a fair, accessible, confidential, and transparent process for employees and stakeholders to raise complaints, concerns, or grievances. We encourage individuals to speak up without fear of retaliation. Complaints may relate to workplace matters, discrimination, harassment, health and safety, human rights, environmental concerns, unethical conduct, or business issues.

All complaints will be reviewed objectively, investigated fairly, and resolved as promptly as possible. Continental protects complainants from retaliation and maintains confidentiality throughout the process. Records are retained to support continuous improvement, compliance, and responsible business practices.

2.6 Financial Accountability

Continental maintains complete and accurate accounting records and undergo independent financial audits where applicable.

2.7 Anti-Money Laundering

This policy strictly prohibits employees from engaging in any form of bribery, corruption, or unethical facilitation payments. Facilitation payments that are unethical or unlawful are prohibited.

Continental shall:

- Know its suppliers and customers.
- Verify legitimacy of transactions.
- Identify unusual transactions.
- Cooperate with authorities when required.

3. HUMAN RIGHTS MANAGEMENT

3.1 Human Rights Policy

Continental respects internationally recognized human rights and dignity for all persons.

3.2 Human Rights Principles

Continental is committed to respecting and protecting internationally recognized human rights throughout its operations and supply chain. We prohibit child labour, forced labour, human trafficking, discrimination, harassment, and any form of abuse. We promote equal opportunities, fair wages, reasonable working hours, and respect for freedom of association.

We provide a safe and healthy workplace for all employees and maintaining confidential channels for reporting concerns. We also work with suppliers and business partners who share our commitment to responsible sourcing, ethical business practices, and respect for human rights.

3.3 Human Rights Due Diligence

Annual assessments shall review:

- Workforce practices
- Recruitment activities
- Supplier risks
- Grievance trends

Corrective actions should be implemented where risks are identified.

3.4 Non-Discrimination Policy

Continental is committed to providing a fair, respectful, diverse, and inclusive workplace for all employees. We do not tolerate discrimination based on race, nationality, ethnicity, gender, age, religion, disability, marital status, sexual orientation, or any other protected characteristic. Employment decisions, including recruitment, promotion, training, compensation, and performance evaluation, are based on merit, qualifications, and business needs.

All employees are expected to treat others with dignity and respect and help maintain an inclusive working environment. Any concerns about discrimination should be reported promptly and will be handled confidentially and without retaliation.

3.5 Anti-Harassment & Anti-Bullying Policy

We provide a safe, respectful, and professional workplace free from harassment, bullying, intimidation, and offensive behaviour. We adopt a zero-tolerance approach towards any form of harassment or bullying, whether in the workplace, during business travel, company events, or through work-related communications.

Employees are expected to treat others with dignity, courtesy, and respect. Any concerns should be reported through the appropriate channels and will be handled fairly, confidentially, and without retaliation. Employees who engage in harassment, bullying, or retaliatory behaviour may be subject to disciplinary action, including termination of employment.

4. HEALTH & SAFETY MANAGEMENT

Continental provides a safe, healthy, and compliant workplace for all employees, contractors, and visitors. We strive to identify and minimize workplace risks through regular inspections, risk assessments, training, and continuous improvement initiatives. Employees are expected to follow safety procedures, report hazards, and actively support a positive safety culture.

Continental promotes physical and mental wellbeing through safe working practices, emergency preparedness, health awareness, and appropriate workplace facilities. Safety is everyone's responsibility, and we are dedicated to maintaining a work environment where people can work confidently, safely, and productively.

5. ENVIRONMENTAL RESPONSIBILITIES

We conduct business in an environmentally responsible and sustainable manner. We strive to reduce the environmental impact of our operations by conserving energy, water, fuel, and other natural resources, while promoting waste reduction, reuse, and recycling.

Continental supports responsible consumption, sustainable packaging, and continuous improvement in environmental performance. We comply with applicable environmental laws, regulations, and industry standards, and encourage employees to adopt environmentally responsible practices in their daily work. Through monitoring, awareness, and ongoing improvement initiatives, we aim to reduce our environmental footprint and support long-term sustainability.

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