
CLAUS UNION SL

CLAUS UNION SL, founded by the brothers Miguel Ángel and Francisco Claus, is a company whose activity is focused on the manufacture and wholesale of jewelers at an international level. It was created in 2011, based on a long family tradition and is located in the Jeweler Park of Cordoba.

It currently participates in the most important fairs in the sector, such as Vicenza Oro, Las Vegas, Hong Kong, Oroarezzo..., and its models are exported to many countries around the world.

All the products are designed by the company itself, with more than 3,000 models suitable for each market. They are mainly manufactured in 9k, 10k, 14k and 18k gold and are combined to create collections of brilliants, precious stones, semi-precious or plain gold.

In 2016, seeing the rising trend of online sales, it was decided to create the brand BEA SOLDADO and bet on this sales channel for the final public. To this end, Bea, who gives her name to the brand and is a fundamental part of its development, joined the company. The philosophy of this brand is based on 9k gold and simple and elegant minimalist designs, a perfect mix to reach all audiences.

For both business models we have a fantastic team of professionals, favored by a great atmosphere and capacity to face all the projects we have set for the future.

Our workshop is located in the Jeweler Park in Córdoba, Carretera de Palma del Río, KM 3.3. Fase 2 Nave 14. 14005 Córdoba, Spain, where we employ 11 people. In addition, through El Corte Inglés, we have several points of sale of our Bea Soldado brand in Cordoba as well as in Madrid, Jerez, and Seville at the moment.

CLAUS UNION SL is a member of the Responsible Jewelry Council (RJC).

The RJC is an organization that sets standards to promote socially and environmentally responsible practices and respect for human rights throughout the supply chain of jewelry made of gold, silver, platinum group metals, diamonds and colored gemstones.

The RJC has developed a benchmark standard for the jewelry supply chain and reliable mechanisms to verify responsible business practices through an external audit.

CLAUS UNION SL, as a member of the RJC, undertakes to:

1. To operate our business in accordance with the RJC Code of Practice, in an honest, ethical, responsible and professional manner.

2. To conduct our business in accordance with applicable law at all times, regardless of the country in which we operate. To protect and promote the protection of all Human Rights and Civil Liberties included in the Universal Declaration of Human Rights.
3. To integrate ethical, human rights, social and environmental aspects into our daily operations, business planning activities and decision-making processes.
4. To combat and prosecute any signs of discrimination on the basis of sex, race, physique, origin, ideology, religion, marital or social status.
5. To promote measures that favor a working environment that is compatible with personal development.
6. To develop responsible and sustainable behavior that seeks to respect and promote the conservation of the environment.
7. To combat fraud in the operations and commercial transactions carried out, in compliance with Law 10/2010, of 28 April, on the prevention of money laundering and the financing of terrorism.
8. To protect and under no circumstances accept any form of child labor in our activities and to prohibit the practice of any form of forced or involuntary labor.
9. To treat our employees with equality, dignity and respect.
10. To contribute and provide resources that have a positive impact on the social, economic and environmental development and well-being of the communities in which we operate.
11. To ensure that our supply chain does not support or benefit armed and anti-social groups in conflict involving human rights abuses and non-compliance with the OECD Guidelines,
12. Ensure that our manufacturing and trade supports peace and development rather than conflict.

Signed/Approved: In Cordoba, 15 January 2023



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Responsible Business Practices Policy Statements of

CLAUS UNION SL.

In order to develop our commitments, we have drawn up a Corporate Responsibility Policy for our company, with the aim that all members of CLAUS UNION SL as well as the rest of the companies with which we have direct or indirect relations, comply with it.

1. WE COMPLY WITH CURRENT LEGISLATION

a) Compliance with the law

CLAUS UNION SL is committed to conducting all our business activities in an ethical and professional manner, in accordance with all applicable national and international legislation.

All personnel are directed to comply with all applicable laws and regulations, and it is their responsibility to know and understand the legal, regulatory and internal requirements that apply to the work.

b) Financial Accounts, Bribery, Facilitation Payments, Money Laundering and Terrorist Financing

We are committed to combating dishonesty and fraud in all business transactions.

CLAUS UNION SL will not finance political parties, their foundations, representatives or candidates, nor will it sponsor any event whose exclusive purpose is political propaganda and which could lead to a profit in its business transactions.

Strict compliance with any and all applicable national and international laws and regulations regarding money laundering, terrorist financing, bribery, facilitation payments, corruption, smuggling, embezzlement, fraud, organized crime, transfer pricing and tax evasion is required in all relevant jurisdictions.

To this end, we will never encourage or pay payments to third parties for the facilitation of achieving our objectives, and this is strictly prohibited in all business dealings within the company.

CLAUS UNION SL undertakes to maintain the highest standards of financial integrity, thus complying with the generally accepted accounting principles in the country in which it operates.

Any application for public aid or subsidies and the management of the same will strictly comply with the established legal requirements.

Likewise, we undertake to compete and compete in the market in a fair manner, complying with antitrust regulations and rejecting unfair competition.

CLAUS UNION SL, as well as its suppliers and customers, shall avoid, as far as possible, carrying out transactions directly or indirectly with any country considered to be a tax haven, risk countries and countries with a significant level of corruption. In the event of maintaining any relationship with suppliers or customers operating in these countries, they shall be subject to intense vigilance to ensure compliance with the legislation of all the commitments included in the responsible practices policy.

2. RESPONSIBLE SUPPLY CHAINS, HUMAN RIGHTS, DUE DILIGENCE

a) Business partners

In compliance with our commitment to the development of the communities in which we operate, CLAUS UNION SL will carry out all relevant actions and efforts to obtain a similar commitment from its business partners.

The organization's practices will be communicated to interested parties, such as investors, business partners, employees and consumers.

b) Human Rights

It is the responsibility of CLAUS UNION SL to pursue the enhancement of corporate value through sound business practices. All activities carried out by the company, directly or indirectly through its business partners, shall always be in strict compliance with the fundamental rights contained in the Universal Declaration of Human Rights as well as all principles relating to the rights set out in the Declaration of the International Labor Organization and the Fundamental Principles and Rights at Work.

Under no circumstances will it tolerate child, forced or involuntary labor, either in the course of its business or by any of its suppliers or customers, nor will it tolerate or benefit from abuses associated with the mining, transport or trade of gold, and it will immediately cease to engage with any supplier or customer who is deemed to be a risk with respect to the above abuses.

The knowledge that any of the business partners supports these practices directly or indirectly, for example, by establishing business relations with those who carry out these practices, will result in the immediate interruption of all types of business relations.

CLAUS UNION SL undertakes to disseminate this policy to its suppliers and customers, as well as to its employees, thus promoting the development of good practices and, in the event that they do not comply with it, to subscribe to that of CLAUS UNION SL.

c) Community Development

CLAUS UNION SL supports and promotes initiatives aimed at improving the quality of life of the communities in which it operates through sponsorship and/or awareness-raising activities or other forms of collaboration, thus contributing to their social and economic well-being, respecting the environment in all our activities and opting for local growth, thus guaranteeing our commitment to the development of the communities in which we operate.

d) Safety

At CLAUS UNION SL, and given that our business carries out the export of jewelry items both within and outside the European Union, we are committed to complying with the General Data Protection Regulation (GDPR) both in our own company and with our customers and suppliers with whom we deal.

CLAUS UNIÓN, S.L. has facilities located in the Jeweler Park de Córdoba, considered the safest and with surveillance and access control measures that guarantee the security against theft or intrusion of all its personnel as well as any other personnel working in its facilities. In the case of activities carried out outside the facilities, such as attending trade fairs, transport will be carried out whenever possible by public means. Likewise, CLAUS UNIÓN, S.L. has controlled internal management and shipping procedures that ensure the integrity of the items from their origin to their delivery to the customer.

e) Declarations of origin

CLAUS UNIÓN, S.L. does not make any declarations of origin.

CLAUS UNION SL only uses metal from responsible suppliers who comply with safety requirements and ensure compliance with human rights.

The diamonds used by CLAUS UNION SL originate from legal sources, are not involved in the financing of armed conflicts and comply with the resolutions of the United Nations, the Kimberley Process Certification Scheme and/or the World Diamond Council (WDC) System of Warranties Statement.

3. LABOUR RIGHTS AND WORKING CONDITIONS

a) General conditions of employment

Our employees are the cornerstone of the company, therefore, CLAUS UNION SL is committed to:

- Respect their fundamental rights, in compliance with the Royal Legislative Decree 2/2015, of 23 October, which approves the revised text of the Law of the Statute of Workers.

- Respect at all times the labor regulations in force, both national and international, and shall require Suppliers and third parties to comply with the regulations relating to Occupational Risk Prevention, identifying, through assessments of business partners, irresponsible practices that may lead to the cessation of commercial collaboration.

- Promote equal opportunities among all employees of the organization, providing them with the necessary means for professional development on an equal basis.

- To avoid harassment in the workplace.

- To ensure the diversity of the staff and the elimination of all types of discrimination, whether it be for reasons of sex, age, race, religion, origin or disability and other legally established circumstances.

- Guarantee healthy working spaces and conditions for employees, complying at all times with the regulations on occupational risk prevention.

- Guarantee gender equality and the rights of people with disabilities in all its actions.

- Facilitate the reconciliation of work and family life.

- Efficiently manage the organization's knowledge and provide its employees with the necessary training to carry out their work.

- To guarantee decent salaries in accordance with the different jobs, with no differences between salaries based on gender.

b) Child labor

CLAUS UNION SL rejects all forms of child labor and undertakes to support the elimination of child labor, including in its supply chain, in accordance with national and international legislation.

c) Forced labor

We undertake to carry out our activity always respecting both the rights and the integrity of all the parties involved in it, denouncing any form of forced or coerced labor that is detected.

d) Right to association and collective bargaining

At CLAUS UNION SL, we support freedom of association and the effective recognition of the right to collective bargaining of our workers, and we will facilitate the necessary actions that lead to compliance with national legislation.

e) Non-discrimination, Harassment

The company is committed to ensuring equal treatment of all employees without any discrimination, distinction or exclusion on the basis of race, color, sex, religion, political opinion, national origin, social background, physical or mental disability.

We will at all times promote a respectful and egalitarian working environment, and the company will apply the appropriate disciplinary measures if it verifies the existence of any situation of harassment, intimidation or any other form of humiliation, and will report the facts to the competent authorities.

4. HEALTH, SAFETY AND ENVIRONMENT
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In our company, we must all commit ourselves to responsible and sustainable behavior that seeks to respect and promote the conservation of the environment and will require suppliers and third parties to comply with environmental regulations, identifying, through evaluations of business partners, irresponsible practices that may lead to the cessation of commercial collaboration.

CLAUS UNION SL is committed to carrying out its activity with the least possible environmental impact. To this end, the company undertakes to:

- Ensure compliance with national and international environmental regulations.
- Identify and minimize the possible environmental risks derived from our activity.
- Act against climate change by reducing its environmental footprint as far as possible.

- Promote responsible consumption within the organization, both among its employees and suppliers.
- To train and raise environmental awareness among our employees.
- Encourage the use of renewable or less polluting energies.
- Respect and promote the conservation of marine and terrestrial biodiversity.
- Make efficient use of natural resources to minimize waste generation through recycling and pollution prevention, identifying and minimizing possible environmental risks.

With regard to the health and safety of people, any impacts arising from our business processes will be identified and eliminated through the use of safeguards, personal training, work practices and health monitoring. All employees will be provided with the necessary training and resources in occupational health and safety.

CLAUS UNION is committed to promoting measures that foster a good working environment, compatible with personal development.

Furthermore, with regard to data protection security measures, we will only collect and use personal data within the company for clear, defined and legitimate purposes, taking all necessary measures to protect all personal data entrusted to us.

All employees will refrain from inappropriate or unauthorized use of this data.

SUSTAINABLE DEVELOPMENT GOALS (SDGS)



At CLAUS UNION SL, we strive to take into account in the development of our activity each and every one of the Sustainable Development Goals, including:

o **End of poverty:** The company is committed to fostering economic growth that promotes equality and is sustainable.

o **Zero hunger:** The company contributes by integrating the Guiding Principles on Business and Human Rights, to avoid causing negative impacts on the human rights of local communities, particularly the right to food.

o **Health and well-being:** The company is committed to ensuring a healthy life and promoting well-being for all in all aspects. Having health and safety management systems in place at the company's facilities and requiring them from suppliers to reduce occupational accidents and illnesses throughout the value chain.

o **Quality education:** The organization is committed to providing access to the internet and information, as well as allowing access to mobile telephony.

o **Gender equality:** The organization promotes and protects gender equality in the workplace. Inclusive, equitable and quality equality.

o **Clean water and sanitation:** The organization provides access to basic services, such as safe drinking water and appropriate spaces for personal hygiene on the premises.

o **Affordable and clean energy:** The company is committed to diversifying its business model towards renewable energies.

o **Decent work and economic growth:** The organization pledges to protect labor rights and promote a safe and secure working environment for all workers.

o **Industry, innovation and infrastructure:** We support the development of more environmentally friendly infrastructure and technologies.

o **Reducing inequalities:** The company is committed to empowering and promoting the social, economic and political inclusion of all people, regardless of age, gender, race, disability, ethnicity, origin, religion, economic or other status. At CLAUS UNION we use different races in our social networks

o **Responsible production and consumption:** The organization is committed to reducing waste generation through waste prevention, reduction, recycling and reuse activities.

o **Peace, justice and strong institutions:** The company is committed to preventing corruption and bribery in all its forms.

5. SUPPLIER AND CUSTOMER POLICY

CLAUS UNION requires strict compliance with our policy by both customers and suppliers. If this is not the case, cooperation with them will be excluded immediately. Thus, we stipulate as necessary requirements to be fulfilled by our suppliers and customers in order to initiate or maintain any business relationship:

- Consideration and respect for Human Rights by virtue of the Universal Declaration of Human Rights as well as all the principles relating to the rights established in the Declaration of the International Labor Organization and the Fundamental Principles and Rights at Work.
- CLAUS UNIÓN, S.L. will assess its business partners on the basis of the OECD's five-step framework and its gold supplement for responsible supply chains of minerals from conflict-affected and high-risk areas (CAHRA), and will rule out any business relationship that poses a risk to human rights.
- Bribery, corruption, money laundering and terrorist financing will not be accepted.
- We will not do business with suppliers or customers who offer or receive bribes to conceal or disguise the origin of minerals or falsely declare taxes.
- At all times, support will be provided to security forces, as well as support for transparency of government payments.
- Under no circumstances will support, directly or indirectly, to illegal armed groups and organized crime be considered.
- With regard to abuses associated with gold mining, transport or trade, our suppliers and customers will not tolerate or profit in any way from: torture, forced labor, any form of child labor, human rights violations and abuses, and war crimes.
- Support, directly or indirectly, will not be given to public or private security forces that act illegally, or commit the abuses mentioned above.
- Stakeholders will be allowed to express their concerns about the jewelry supply chain.

CLAUS UNION SL, in order to comply with all of the above, will carry out a risk analysis of each supplier and customer, in order to ensure that there is no risk and to assess the suitability of this for the interests of the company.

To this end, a questionnaire will be sent to the company to EVALUATE BUSINESS PARTNERS. DUE DILIGENCE, which will assess the suitability of the Supplier or client for the contracting of third parties. For acceptance, it will be an essential requirement to accept the policy or to submit their own policy, which will be studied and the alignment of their practices with the Corporate Responsibility Policy will be checked, in which case the supplier/client will be approved.

With the above, the contracting process of CLAUS UNION SL will be carried out by means of:

1. Identification of existing relevant business partners
2. Sending all existing business partners, the questionnaire TRADING PARTNER ASSESSMENT. DUE DILIGENCE (KYC), which includes the Corporate Responsibility Policy.
3. Verification of compliance and its practices with the Corporate Responsibility Policy once the completed questionnaire has been received and it has been verified that it complies with the established standards, and is then approved by CLAUS UNION SL.
4. Failure to comply with any of these rules shall lead to the termination of the contract.

Both CLAUS UNION SL and its suppliers and customers shall avoid as far as possible carrying out transactions, directly or indirectly, with any country considered to be a tax haven, countries at risk and countries with significant levels of corruption according to Transparency International.

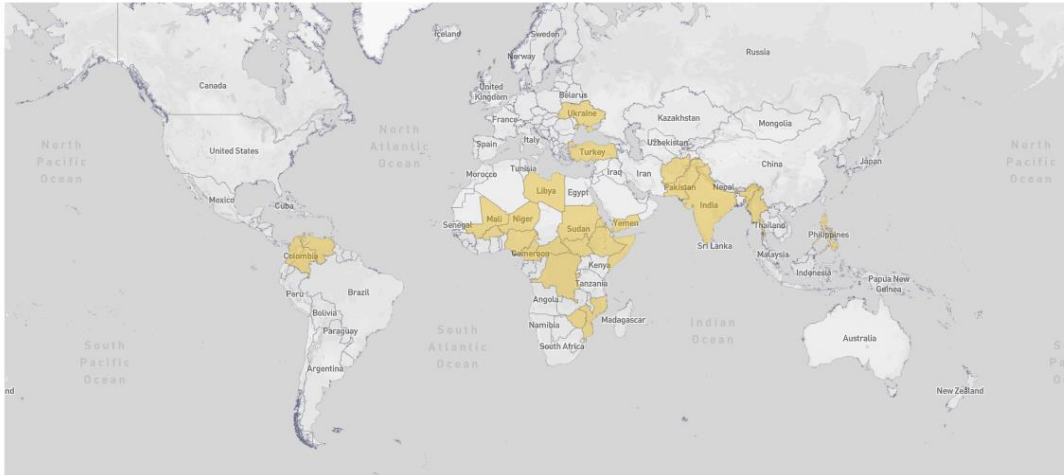
The three lists are attached as an appendix to this policy for information purposes, with the lists published by the corresponding bodies being applicable in all cases.

In the event that Suppliers and/or Clients are obliged to work with third parties resident in these countries, they must justify this decision and/or demonstrate that despite being located in these geographical areas, there is no risk of violation of any of the principles included in our policy. CLAUS UNIÓN, S.L. shall be authorized to terminate the commercial relationship with said third party at any time.

ANNEX 1. LIST OF CAHRA COUNTRIES

<https://www.cahaslist.net/>

GLOBAL MAP



The boundaries, names and designations on this website's maps do not imply endorsement or acceptance by RAND Europe or the European Commission.

ANNEX 2. LIST OF TAX HAVENS

According to the report of 23 December 2014 prepared by the Directorate General of Taxation of the State Secretariat of Finance, under the Ministry of Finance and Public Administrations, the current list of tax havens approved by RD 1080/1991, of 5 July, with the exclusions derived from the application of the amendment introduced by RD 116/2003, of 31 January, is made up of 33 countries:

1. Emirato del Estado de Bahrein	2. Sultunato de Brunei	3. Gibraltar
4. Anguilla	5. Antigua y Barbuda	6. Bermuda
7. Islas Caimanes	8. Islas Cook	9. República de Dominica
10. Granada	11. Fiji	12. Islas de Guernesey y de Jersey (Islas del Canal)
13. Islas Maldivas	14. Isla de Man	15. Islas Marianas
16. Mauricio	17. Monserrat	18. República de Naurú
19. Islas Salomón	20. San Vicente y las Granadinas,	21. Santa Lucía
22. Islas Turks y Caicos	23. República de Vanuatu	24. Islas Vírgenes Británicas
25. Islas Vírgenes de Estados Unidos de América	26. Reino Hachemita de Jordania	27. República Libanesa
28. República de Liberia	29. Principado de Liechtenstein	30. Macao
31. Principado de Mónaco	32. Sultanato de Omán	33. República de Seychelles

ANNEX 3. COUNTRIES AT RISK AND COUNTRIES WITH SIGNIFICANT CORRUPTION INDICES ACCORDING TO INTERNATIONAL TRANSPARENCY.

1. Guyana	2. República Centrafricana	3. Mauritania
4. Paraguay	5. Azerbaiyán	6. República del Congo
7. Gambia	8. Tayikistán	9. Honduras
10. Chad	11. Kazakstán	12. República Democrática del Congo
13. Nepal	14. Camboya	15. Pakistán
16. Myanmar	17. Togo	18. Zimbabue
19. Madagascar	20. Burundi	21. Nicaragua
22. Angola	23. Timor-Leste	24. Guinea-Bissau
25. Camerún	26. Haití	27. Irán
28. Venezuela	29. Kirguistán	30. Yemen
31. Líbano	32. Eritrea	33. Nigeria
34. Libia	35. Rusia	36. Uzbekistán
37. Comoros	38. Turkmenistán	39. Uganda
40. Iraq	41. Ucrania	42. Bangladesh
43. Afghanistan	44. Guinea	45. Sudán
46. Kenia	47. Corea del Norte	48. Laos
49. Somalia	50. Papua	51. Nueva Guinea

6. COMMUNICATION AND COMPLAINTS CHANNEL

CLAUS UNION SL encourages all staff to raise concerns if they have a genuine reason to believe that a policy, operation or practice of the entity is violating or is likely to violate any law, regulation or internal rule or policy of the entity, including these Business Principles. CLAUS UNION SL assures all employees who come forward in good faith to report problems that they will be treated fairly and respectfully. While every effort will be made to protect the anonymity of employees to the extent possible, no form of retaliation against such persons will be tolerated, assuming they were not involved in the violation.