



# Raselli Franco spa

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REA 147400 – Marchio 2294 AL  
Cap. sociale i.v. € 5.050.505,00



## Due diligence



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Raselli Franco S.p.a. founded by Franco Raselli, was established in 1969. Following further developments, it becomes an international group with physical presence in 7 countries.

The decisions regarding the production processes are designed to guarantee and protect the quality of the product and to defend the confidentiality of new developments of our customers. The fully automated management and tracking system of the supply chain allows a clear and always updated planning of deliveries. The production process is fully integrated, it starts from the ideas of our customers which are also helped by our design department. Side to this a CAD/CAM team as well as hand made products takes care of the first steps of every creation. The production process that starts from waxing and goes through casting, assemble, polishing, laser engraving, rhodium till a finished product is fully tracked and strictly subject to various QC. Alongside technology, we continue to work by hand, using the experience in handcrafted jewelry and the manual skills that are passed from generation to generation of our workers.

Raselli Franco spa headquarter is in Italy with a global presence, you can find us in Paris, New York, Hong Kong, Guangzhou, Montreal and Taipei.

Please visit us at [www.gruppoerrepi.com](http://www.gruppoerrepi.com) for any further detail.



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We introduce our code of conduct that we apply to all our collaborators, such as our employees, suppliers and customers. We work hard by adhering to all ethical and moral principles that the RJC requires, and we expect all of our associates to do the same.

## 1. Child labor

- a. Not employ people under the age of 16, the age for completing compulsory education.
- b. Maintain adequate human resource systems and practices to verify that there are not workers under the minimum age.
- c. Ensure that young workers are employed under well defined circumstances, such as training programs.
- d. Young workers have to be registered with authority and they have to receive applicable health checks.
- e. Young workers are not exposed to hazardous work conditions.
- f. Young workers are not allowed to work overtime.
- g. Internships are allowed if it's part of:
  1. a course of training where the school is primarily responsible.
  2. Programs are approved by the competent authority.
  3. Program of guidance designated to facilitate the choice of an occupation or of a line of training.
- h. Company will pay directly the young worker, not through an agent or school.

## 2. Sexual harassment and gender based violence

- a. Not use corporal punishments, threats of violence.
- b. Ensure workers a work environment free from harassment.
- c. No discrimination exists on the grounds of race, religion, political opinion, membership, age, nation of origin, sexual orientation, gender, marital status, disability, ethnic origin or any other basis.
- d. All medical examinations are job related and consistent with business necessity.
- e. Employment is not based on a person's medical status unless such status conflicts with the inherent requirements of the job.
- f. Equal opportunities for workers of all genders across all aspects of personal and professional development and career advancement.
- g. Workers of all gender receive equal pay for work of equal value.
- h. Not discrimination for pregnancy workers.

## 3. Forced labor

- a. All workers are free to leave their employment without threat or coercion.
- b. Not use any practice to coerce the continued employment of any workers.
- c. Explain the terms of employment contract.
- d. Employees shall not be required to turn over their original identity papers to their employer.



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## 4. Hours of work

- a. Complying with Italian law intend to ensure employees do not work excessive hours.
- b. Regular and overtime hours are recorded in a reliable timekeeping system.
- c. Workers must be allowed one day off in seven.
- d. Workers are informed at least 42 hours prior for any working hours changes.
- e. Normal working week must not exceed 40 hours.
- f. Ensure to workers that overtime hours not exceed daily, weekly, and monthly legal limits.
- g. Ensure that employees who refuse to work overtime are not punished or penalized in any way.

## 5. Health and Safety

- a. A risks rating document is drawn up for evaluate each internal risk.
- b. Provide a safe and healthy work environment and fully comply with all applicable safety laws.
- c. Assess the workplace for hazards periodically and implement, if necessary, appropriate programs control in order to minimize risks.
- d. Periodically train workers about Health and Safety.
- e. Provide to employees an adequate working space without risk to health and safety, so a work space clean, dry and in a good state of repair.
- f. Provide adequate lighting.
- g. Provide adequate system for an appropriate ventilation.
- h. Identify and control machinery risk.
- i. Control periodically in order to eliminate the risk of injury from unsafe machinery.
- j. Control in order to prevent ergonomic problems.
- k. Workers who make repetitive activities take breaks or changes in activity.
- 🔥 Provide 4 different emergency paths for each floor.
- 🔥 Maintain exits for free and unobstructed egress.
- 🔥 Arranged and mark exit paths.
- 🔥 Mark doorways that could be mistaken for exits.
- 🔥 Adequate emergency lighting at all exits along route of escape.
- 🔥 Fire alarm system can be heard and seen by each worker.
- 🔥 Maintain all alarm systems in good working order.
- 🔥 Adequate number of fire extinguishers which are testing periodically in order to assure that are efficient if needed.
- 🔥 People designated trained to fire prevention.
- 🚑 Ensure workers are not exposed to physical, chemical or biological hazards.
- 🚑 Ensure an adequate number of trained first aid responders with a certification in first aid.
- 🚑 Ensure first aid materials in an special box.
- 🚑 About risk of chemical exposure to eyes, workers have at them disposal eye wash boxes.
- 💡 Only trained and authorized workers may conduct repairs to electrical equipment.
- 💡 Electrical distribution areas must be guarded against accidental damage.
- 💡 Access to electrical distribution rooms must be restricted to authorized workers.
- 💡 Electrical control devices are labelled to identify the equipment controlled.
- 💡 Electrical wiring and cables are in good conditions.



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- 💡 Periodic inspection and testing are scheduled about electrical safety.
- 💡 Workers are trained in electrical safety rules.
- 🛡️ Suitability of PPE presently available and select new or additional equipment that provide protection from hazards.
- 🛡️ PPE are used where appropriate and does not itself.
- 🛡️ Eye and face protection are granted to people who manage hazardous tools.
- 🛡️ Safety shoes are required to be worn when carrying materials such as heavy tools.
- 🛡️ Suitable gloves must be worn when hazards from chemicals, biologicals or harmful temperature extremes.
- 🛡️ PPE are maintained in clean and good working condition.
- 🛡️ Workers required to wear PPE received initial and ongoing training, and they have to demonstrate an understanding of the training.
- 🛡️ Workers must no pay for PPE.
- 👄 Periodic inspection and testing are scheduled about respiratory hazards.
- 👄 Ensure respirators and filters are cleaned and disinfected as often as necessary.
- 👄 Filters are changed based upon a determined schedule.
- 🍽️ All food made available to workers shall be prepared, stored and served in a safe and sanitary manner.
- 🍽️ Areas of food preparation meet hygiene and sanitary standards.

## 6. Right to join a trade union and representative organizations

- a. Workers are free to decide to join association and collective bargaining.
- b. Prohibit deduct union membership fees from legal wages without the consent of the worker.
- c. Shall allow union representatives reasonable access to their members under conditions established by Italian law.
- d. Prohibit use violence in order to intimidate or to prevent any activities that constitute a lawful exercise of the right of association.
- e. Not impose any sanction on workers organizing or having participated in a strike.
- f. Honor terms of ant signed collective bargaining agreement for the duration of the agreement.

## 7. Wages

- a. Provide to each worker a level of compensation for a regular workweek that is sufficient to meet the basic needs.
- b. Comply with Italian law in the payment of wages and overtime work hours and provision of benefits including holidays, leaves and statutory severance.
- c. Ensure, for overtime work hours, compensation of at least 25% more for each worker base wage.
- d. Provide to workers a wage statement with the following information:
  1. Pay period and wage payment dates.
  2. Regular and overtime hours worked.
  3. Wage rates for hours of work.
  4. Additional compensation such as individual bonus.
- e. Not delay payments to workers under any circumstance beyond 30 days.



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- f. Not use deductions from legal wages as a form of discipline.
- g. Ensure workers giving birth are entitled to unpaid maternity leave and be entitled to return to their employment.

## 8. Bribery and money laundering

- a. Not engage corrupt practices, including bribery, extortion, embezzlement, fraud, money laundering or any business related to terrorist activity.
- b. Not violate Foreign Corrupt Practices Act (FCPA).
- c. Procedures in compliance with applicable anti-corruption and bribery laws.
- d. Not provide anything of value to any official or employee of government agency.

## 9. Grievance mechanisms

- a. Use of suggestion boxes.
- b. Designated people to whom workers could report grievances such as responsible for workers' safety.
- c. Human resources department is completely at workers disposal for any grievances.
- d. Telegram is an internal app used by the company to send communications and also used from workers for eventually questions of grievances.

## 10. Environment and Chemical use

- a. A risks rating document is drawn up for evaluate each internal risk for chemical use.
- b. Periodically measures in order to minimize environmental impact.
- c. Keep current with all required environmental permits.
- d. Management system to identify chemicals or hazardous materials.
- e. Ensure Safety data sheets are obtained from chemical manufacturers.
- f. Hazardous chemical containers are labeled.
- g. Ensure chemical and waste storage areas are designated and maintained to prevent leaks.
- h. Minimization of environmental impacts throughout the supply chain.

## 11. Security, data protection and conflict of interests

- a. Ensure safety and security for all workers and visitors.
- b. Visitors must receive express authorization to access the various units. Their identity cards are recorded in a system in order to monitor access to the company.
- c. Establish measures to prevent product or intellectual property theft, unauthorized access to or loss of workers or customer personal information.
- d. In carrying out the duties it is necessary to adopt suitable custody, control measures and any precautions that allow to minimize the risk of destruction or loss, even accidental, of the data.



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- e. The data processed must be considered as confidential and must not be communicated to anyone who has not been previously authorized by the Data Controller to be able to know them. Our suppliers, customers and workers sign a declaration for data protection (GDPR).
- f. Accurate security system equipped of cameras and double entrance door.
- g. Suppliers, customers and workers must concentrate on the interests of Raselli Franco spa and not damage its work by favoring the interests of third parties.

## 12. Human rights

- a. Ensure human rights are protected and prioritized in all aspects of its operation.
- b. Suppliers, customers and workers must follow the principles of United Nations Universal Declaration of Human Rights.
- c. Child labor is not tolerated.
- d. Not use corporal punishments, threats of violence.
- e. Workers must have a work environment free from harassment.
- f. No discrimination exists on the grounds of race, religion, political opinion, membership, age, nation of origin, sexual orientation, gender, marital status, disability, ethnic origin or any other basis.
- g. All workers are free to leave their employment without threat or coercion.
- h. Complying with Italian law intend to ensure employees do not work excessive hours.
- i. Provide a safe and healthy work environment and fully comply with all applicable safety laws.
- j. Workers are free to decide to join association and collective bargaining.
- k. Provide to each worker a level of compensation for a regular workweek that is sufficient to meet the basic needs.
- l. Comply with Italian law in the payment of wages and overtime work hours and provision of benefits including holidays, leaves and statutory severance.
- m. Not engage corrupt practices, including bribery, extortion, embezzlement, fraud, money laundering or any business related to terrorist activity.
- n. Ensure safety and security for all workers and visitors.

## 13. Diamond warranties and Colored gemstones

- a. We will neither tolerate nor profit from, contribute to, assist or facilitate the commission of:
  - 1. torture, cruel, inhuman and degrading treatment.
  - 2. forced or compulsory labour.
  - 3. the worst forms of child labour.
  - 4. human rights violations and abuses.
  - 5. war crimes, violations of international humanitarian law, crimes against humanity or genocide.
- b. 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.
- c. Regarding direct or indirect support to non-state armed groups we only sell or purchase diamonds/coloured gemstones that are fully compliant with the Kimberley Process Certification Scheme and, as such, will not tolerate direct or indirect support to non-state armed groups, including, but not



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limited to, procuring diamonds/coloured gemstones from, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates who illegally:

1. control mine sites, transportation routes, points where diamonds/coloured gemstones are traded and upstream actors in the supply chain.
  2. tax or extort money or diamonds/coloured gemstones at mine sites, along transportation routes or at points where diamonds/coloured gemstones are traded, or from intermediaries, export companies or international traders.
- d. 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.
- e. 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 or that act illegally.
- f. Regarding bribery and fraudulent misrepresentation of the origin of diamonds/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 diamonds/coloured gemstones, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of diamonds.
- g. 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 diamonds/coloured gemstones.

## 14. Conflict minerals (Gold, Platinum, Silver, Palladium)

- a. We will neither tolerate nor profit from, contribute to, assist or facilitate the commission of:
1. torture, cruel, inhuman and degrading treatment.
  2. forced or compulsory labour.
  3. the worst forms of child labour.
  4. human rights violations and abuses.
  5. war crimes, violations of international humanitarian law, crimes against humanity or genocide.
- b. 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.
- c. 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 minerals from, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates who illegally:
1. control mine sites, transportation routes, points where minerals are traded and upstream actors in the supply chain.
  2. tax or extort money or minerals at mine sites, along transportation routes or at points where minerals are traded, or from intermediaries, export companies or international traders.
- d. 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.





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- e. 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 or that act illegally.
- f. Regarding bribery and fraudulent misrepresentation of the origin of minerals we will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of minerals, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of diamonds.
- g. 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 minerals.

Our Due Diligence is aligned with the OECD Due Diligence Guidance and no risks have been identified in our supply chain.