

## Supply chain policy:

1. Helder dos Santos Torres Herdeiros Lda is a Portuguese family-owned business that has been in the jewellery and watchmaking industry for over 100 years. The company was founded in 1910 by Anselmo dos Santos Torres, and his passion for the exceptional has been passed down through five generations, with Nuno Torres currently leading the company. Helder Dos Santos Torres Herdeiros Lda has maintained its presence in Torres Vedras for over a century, showcasing the quality of Portuguese jewelry designers and also featuring their own creations. The company has a strong commitment to quality and has built a reputation as a reference brand in Portugal's jewelry industry. This policy confirms Helder dos Santos Torres Herdeiros Lda's commitment to respect human rights, avoid contributing to the finance of conflict and comply with all relevant UN sanctions, resolutions and laws.
2. Helder dos Santos Torres Herdeiros Lda 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. All complaints received will be considered individually and by senior management positions to ensure that they are treated properly regarding the dimension of the problem. We have a working fully implemented system where any stakeholder can see how and to whom should they address their complaints or worries.
4. **Regarding serious abuses associated with the extraction, transport or trade of diamonds/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.
6. **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 limited to, procuring diamonds/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 diamonds/coloured gemstones are traded and upstream actors in the supply chain; or
  - b. 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.
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 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.

**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 diamonds/coloured gemstones.

Signed/endorsed:

Antônio Torres

Date of effect:

Novembro, 2022

Last Review:

Julho, 2023

