

## SA 8000 and RJC Policy and Ethics

**S.I.L.O. S.p.A** with this updated policy, asserts that it has put into operation a Management System for Social Accountability in compliance with the SA 8000:2014 standard, committing itself to the respect of the rules of labour ethics and rejecting all working conditions marked by inhumanity, exploitation, discrimination and unhealthiness.

Through this Policy, the Top Management is communicating, inside and outside the organisation, its intention to operate with transparent and efficient methods to guarantee the continuous improvement of a socially and economically sustainable Company Management System.

S.I.L.O. S.p.A confirms the company's commitment to achieving the highest ethical standards and sustainable business development, respecting and applying in the corporate environment the SA8000 Standard principles, in compliance with the applicable legal provisions and the main international human rights and labour rights conventions

S.I.L.O. S.p.A – not only pays attention in assessing the company risks – i.e. the risks of its own activity, deriving also from its own "business partners" – in respect of human rights, and social principles –but also believes that every customer can influence the supplier including every link of the production chain, therefore is able to commit himself to safeguarding the rights of people by informing and stimulating its suppliers to comply with the principles of the standard; therefore the chain of suppliers is consequently qualified and selected on the basis of the ability to meet the aforementioned requirements of responsibility.

**S.I.L.O. S.p.A** – reaffirms its commitment not to discriminate against any race, ethnicity, caste, country of origin, religion, disability, sex, sexual orientation, trade union membership, pregnancy, political affiliation, marital status, physical appearance, social condition or any other violation of the dignity and freedom of workers in the workplace (including the obvious rejection of harassment, abuse, coercion or intimidation in any form, use of child labour, forced labour, restrictions on the freedom of movement of employees, corporal punishment);

- is committed to ensuring high health and safety standards both at our headquarters and in our activities ( also thanks to the contribution of the Risk Prevention and Protection Service members, including the Social Performance Team of the SA 8000) and respect for the environment ( the company is ISO 14001 certified, with a commitment to safeguarding the environment, by eliminating and if not possible reducing the use of toxic substances in our production operations; reducing the negative impact of our activities on the environment as much as possible; by disposing waste responsibly; by reducing the consumption of paper, water and energy)
- is aware that internal and external collaborators and suppliers play a fundamental role in the company's chain of production, hence the relations with them are characterised by fairness, impartiality and respect for equal opportunities for all those involved;

S.I.L.O. S.p.A:

- is committed to respecting the principles of confidentiality and protection of sensitive data by also educating its employees and collaborators;
- does not tolerate any kind of bribery towards public officials, or any other party, in any form or manner, in any jurisdiction, not even where such activities are in practice permitted, tolerated or not judicially prosecuted.
- prohibits the payment of bribes or acceptance of any goods;
- does not tolerate money laundering and/or the financing of terrorist activities;
- is committed to Know Your Customer and Supplier activities;
- is committed to full and detailed disclosure of the characteristics of the products sold;
- is committed to taking appropriate measures to ensure the integrity and security of product shipments;
- is committed to exercising the utmost surveillance over its supply chain (specifically, but not only, for the supply of gold).
- is committed to ensuring product security measures within its premises and during shipments to prevent theft, damage or substitution;
- is committed to maintaining the safety and well-being of Employees, Visitors and other significant Business Partners;
- annually, during the Review of the Ethical System, it shall indicate in particular its corporate performance in terms of Absence of child labour; forced labour, discrimination, respect for freedom of association, proper management of working hours obligations, fair and decent pay, discipline and occupational health and safety practices)
- believes in and is committed to respecting fundamental human rights and the dignity of the individual, according to the UN Universal Declaration of Human Rights.

The Company Management has established the Social Performance Team (composed of Workers' and Management representatives on SA8000 in an equal measure), which has the authority and necessary resources to ensure

- the conformity of the company system to the SA 8000 standard;
- the appropriateness of the system to achieve its objectives;
- the appropriateness of the social responsibility policy;
- the diffusion of knowledge of the SA 8000 requirements.

All company employees and all other interested parties can contact the Social Performance Team for any ethical-social issues.

Workplace dialogue is a key component of social responsibility.

**S.I.L.O. spa** 

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RESPONSIBLE  
JEWELLERY  
COUNCIL



CHAIN  
OF  
CUSTODY

In order to ensure, both to the organisation and to all interested parties, the possibility of constructively contributing to the improvement of the Management System for Social Accountability, the company has implemented an internal communications system for the management of denunciations concerning the SA 8000 standard, which is distributed to workers through a specific document (SA8000 Informative). All the reports sent to the company will be recorded and examined in order to take preventive or corrective action, where possible.

Should the company fail to handle or fully resolve a complaint, employees may make a direct complaint by writing to the DNV certification body, as indicated on the complaints and suggestions form.

The continuous analysis and assessment of the feedback from Interested Parties is the basis for an open and constructive dialogue to identify projects and objectives of mutual satisfaction.

The effectiveness of the SA 8000 Management System over time and the appropriateness of this Social Accountability Policy is evaluated by Top Management by developing periodic Management Reviews, through direct feedback with the Interested Parties and analysing the results of company monitoring and internal audits.

A copy of this policy is distributed in the company workplaces by means of posters in shared locations or on the website [silojewelry.it](http://silojewelry.it). The Corporate Social Responsibility Policy is also transmitted to all the interested parties who request it or to whom we deem necessary to be involved for the purposes of the Social Responsibility Management System.

Castiglion Fibocchi, 16/01/2023

The Board of Management **S.I.L.O S.p.A.**  
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