

## Human Rights Policy

### Introduction

Pino Spitaleri Fine Jewellery Limited is a luxury fine jewellery manufacturer based in London. This policy confirms our commitment to respect the fundamental rights and freedoms in accordance with The Human Rights Act 1998. Our support for these fundamental principles is reflected in our policies and practices regarding employees, suppliers, customers and the areas in which we operate.

### Our Employees

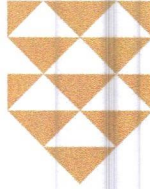
We believe that our employees should be treated with respect and dignity and work in an environment that is free from harassment and unlawful discrimination. Our commitment to respect human rights is manifested in our Employee Handbook and HR Policies and procedures, specifically:

- We will not employ workers under the legal minimum age for work as stipulated by the Employment Act 2008.
- We will not make use of any forced labour or debt-bondage labour in accordance with the Modern Slavery Act 2015.
- We will not discriminate against any person based on their protected characteristics and will uphold Article 14 of the Human Rights Act 1998 in respect of protection from discrimination.
- Any disciplinary matter will be dealt with through formal procedures detailed in the Employee Handbook.
- Working time directives will be adhered to as per the Working Time Regulations 1998 with opt-out clauses publicised to staff.
- Wages paid for standard working hours will meet or exceed national minimum wage or living wage levels as appropriate.
- All employees should be able to work in an environment that is free from discrimination, victimisation, harassment, bullying and that all employees should be treated fairly and with dignity.
- There is a clear policy for dealing with grievances detailed in the Employee Handbook.

The Employee Handbook is periodically reviewed and amended where appropriate to ensure that it continues to reflect best practice and legal requirements. An external consultancy has been engaged to ensure the Company is updated as to any new legislation. Employees are expected to uphold these standards and are encouraged, via regular meetings, to raise issues and report suspected violations of applicable laws, regulations and policies.

### Our Suppliers

We strive to promote adherence to Human Rights principles detailed above throughout our supply chain via our Supply Chain Policy. We see our relationships with our suppliers as an opportunity to share best practice and through open communication, to promote mutual, continual learning and improvement with respect to human rights.



## Our Customers

We are continually working to build and maintain relationships with organisations that share our commitment to upholding and implementing the fundamental principles of Human Rights and strive to promote best practice within our sphere of influence. We openly welcome inspection and auditing processes to ensure we continue to develop a robust and transparent Human Rights Policy.

Name: Pino Spitaleri

Position: CEO

Signature:

Date: 16/07/2024

Pino Spitaleri Fine Jewellery Limited annually report on COP6 Human Rights and this document is available by contacting [Pino@pinospitaleri.com](mailto:Pino@pinospitaleri.com)