



November 2022

Policy on Human Rights

Dana Augustine, Inc. [DAI] is committed to the protection and advancement of human rights. The DAI Human Rights Policy is based on our commitment to our core values of Safety and Health, Ethical Behavior, and Respect for People.

We commit to conduct our business in an ethical and responsible manner that supports and respects the protection of human rights.

We ensure that our jewelry products are made and sold under conditions that show respect for our employees who perform important work in manufacturing and selling our jewelry products.

This policy operates in conjunction with all of our other policies, our regulatory compliance program, our efforts to follow supplier codes of conduct and practices as established by the Responsible Jewellery Council (see details below) and our endorsement of and commitment to the **United Nations' Universal Declaration of Human Rights**.

Child Labor, Slavery, Trafficking

DAI will not permit the use of child labor, slavery or human trafficking in any of its facilities. We will not tolerate the exploitation of children, or the trafficking, physical (corporal) punishment, abuse, or involuntary servitude of any worker. We expect our suppliers and contractors with whom we do business to uphold the same standards.

Pay and Remuneration

DAI pays wages that meet or exceed the legally required wages as provided under applicable Federal, State, and Local Laws.

Hours of Work

DAI will comply with applicable local, state, national laws and industry practices regarding working hours.

Employees

DAI treats its employees with appropriate dignity and respect. Our company is dedicated to non-discrimination, freedom from any type of harassment, freedom of association, and the right to engage in collective bargaining as provided in applicable law.

Safety

Safety and environmental incidents are preventable. We have as a goal and continue to seek an injury free working environment for all of our employees.

Remediation

It is the policy of DAI to assist in and cooperate fully with any efforts to resolve or remediate any items that are identified as impacts under this Policy. DAI will seek to identify, prevent, mitigate, and promptly respond to any complaints or indications of violations of the policies stated herein. A specific Discipline Policy and Grievance Procedure is established and set out below and should be used by employees. All employees should report any violations or issues related to these policies directly to senior management.