FRANK TRAUTZ

Schmuck & Tradition seit 1928

# Compliance and Ethics Guidelines of FH Trautz GmbH

It is the stated policy and practice of FH Trautz GmbH to adhere to high standards of ethical conduct as well as all relevant laws, to process all transactions with complete transparency, and to do business only with individuals and/or companies who themselves adhere to the law and to ethical principles.

We are committed to doing business fairly, openly and honestly because FH Trautz is a brand, which enjoys great trust and recognition worldwide. We do not tolerate any form of corruption (bribery, corruption, accepting and granting advantages). No employee of our company and no business partner may make, offer or accept direct or indirect payments or other benefits in order to gain an improper competitive advantage. This also applies to inappropriate gifts and hospitality.

At FH Trautz, we want to eliminate any possibility of modern slavery in our supply chain. We are committed to acting ethically and with integrity in all of our business dealings and relationships and to enforcing effective systems and controls to ensure that modern slavery does not occur in our supply chain and business. We respect human rights in accordance with the Universal Declaration of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

Respect for the environment, the sparing use of natural resources and respect for human rights is a matter of course for us. This also includes compliance with the OECD Due Diligence Guidelines to promote responsible supply chains for minerals from conflict and high-risk areas.

We will implement these policies such as the RJC's "Code of Conduct", "Code of Practices 2024" as well as the "Laboratory-Grown Materials Standard (LGMS) 2025" and our "Gold, PGM and Silver Supply Chain Policy" through effective communication, training and regular monitoring.

FH Trautz GmbH is a member of the RJC, BV Schmuck und Uhren and the BGHW, which represents the political concerns of producers and processors of precious metals and laboratory-grown materials.

These associations and their members are committed to their social, ecological and economic responsibility. In the course of their business activities, the members actively respect, support and actively promote humanitarian working conditions, social progress, environmental compatibility of their production processes and products, health protection, transparency and open communication. By signing this document, the members undertake to abide by the values and principles codified herein will be adhered to.

This Code of Conduct is intended to do justice to the exposed role and the particular responsibility that German producers and processors of precious metals and laboratory-grown materials perceive as valuable key products of a globalised business world.

Pforzheim, 26.10.2026

Frank Trautz Management
FH Trautz GmbH

# CODE OF CONDUCT FOR SUPPLIERS

FH Trautz GmbH is committed to adhering to moral and ethical values in the management of the company. We expect our external suppliers to apply the same philosophy in running their own businesses. We expect strict adherence to these standards by all our suppliers, their factories, subcontractors as well as their own suppliers. Please note that where national and other applicable laws and the supplier's code of conduct address the same issue, the regulation that sets the highest standard in the workplace will apply. If the supplier's code of conduct is in conflict with applicable laws, the applicable law shall apply.

We strive to work with suppliers who agree to comply with the requirements of this Code of Conduct, which also adheres to the principles of the International Labour Organisation Conventions, the UN Declaration of Human Rights, the OECD - Guidelines, the UN Global Compact, and the RJC LGMS 2025 standard. A violation of these rules of conduct by our suppliers or their subcontractors will result in a review and possible termination of the business relationship.

## EMPLOYMENT REQUIREMENTS AND RESPONSIBILITIES

### Forced Labour
The use of forced labour by our suppliers, whether under threat of punishment, withholding of identity documents, forced deposit of a bond or through other restrictions, is strictly prohibited.

### Child labour
Work by children under the age of 15 is strictly prohibited. In countries where local laws provide for a higher age for child labour or compulsory education is required beyond the age of 15, the higher age shall apply.

### Harassment and abuse
We expect our suppliers to treat their employees with respect and dignity. Our suppliers must not use or allow physical punishment, psychological or physical harassment or allow any other form of abuse.

### Discrimination
We expect our suppliers to treat all employees equally and fairly. Subcontractors shall not discriminate in any way with respect to employment, access to training, promotion or dismissal on the basis of gender, race, religion, age, disability, gender orientation, political views, nationality or social and ethnic origin.

### Wages and benefits
At a minimum, our suppliers regularly pay wages and overtime at the legal rates established by law in the country of manufacture and provide their employees with the benefits required by law in each case. If there is no minimum wage or overtime pay in the country of origin, the supplier shall ensure that wages are at least equal to the average minimum in the relevant industry and that payment for overtime is at least equal to ordinary pay. Deductions from wages shall not be made for disciplinary purposes.

### Working hours
Our suppliers observe the limits set by the laws of the country of manufacture with regard to working hours and overtime. Our suppliers shall not schedule excessive overtime. The total number of hours worked per week, including overtime, shall not exceed 60 hours and shall include at least one day off within a 7-day period or, in both cases, shall comply with the maximum set by the laws in the respective country.

### Freedom of association
We expect our suppliers to respect and recognise the right of every worker to bargain with others, form or join trade unions of their choice without penalty, discrimination or harassment.

### Health and safety
Our suppliers provide a safe and healthy workplace with respect to the specific risks in their industry to prevent accidents or injuries caused by or related to work or equipment use. They implement systems to detect, prevent or neutralise threats to the health and safety of their employees and comply with applicable local and international regulations and laws. The same principles apply to suppliers who provide accommodation for employees.

ENVIRONMENTAL REQUIREMENTS AND RESPONSIBILITIES

We expect our suppliers, like ourselves, to be committed to a clean and safe environment. We support initiatives to reduce our impact on the environment, particularly through the use of environmentally friendly technologies. Our suppliers are committed to respecting local and international environmental regulations and standards. Our suppliers are able to demonstrate effective implementation of the following requirements:
- Proper waste management with special attention to hazardous waste and emissions that cannot be disposed of in a legal manner.
- Employees whose work has a direct impact on the environment are trained, competent and have the necessary resources to carry out their work.

WORKING METHODS

Legal requirements
We expect our suppliers to comply fully with the law. Our suppliers comply with all national, local and international laws regarding the conduct of their business.

Customs and security
Subcontractors shall comply with applicable customs laws, including laws regarding the importation and the prohibition of transporting goods into the importing country.

Subcontractors
Our suppliers obtain the approval of FH Trautz GmbH before subcontracting parts of their manufacturing process to other suppliers. Our approval is subject to the subcontractors' compliance with these rules of conduct and all other applicable conditions.

Anti-corruption
Our suppliers are committed to condemning and counteracting corruption in any form, including bribery and kickbacks.

AUDIT

Audit
We reserve the right to audit compliance with these rules and to conduct audits of compliance at any time without prior notice. Our suppliers shall provide us with the necessary information and grant FH Trautz GmbH representatives access to the operating sites which demonstrate compliance with the requirement of these rules of conduct. Furthermore, they undertake to improve and correct any deficiencies discovered.

Access to information
The supplier shall keep proper records to demonstrate compliance with these rules of conduct. Our suppliers shall provide our representatives with access to complete and accurate original records.

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