



# Responsible Jewellery Council

## General Policy

### 1 General Terms (COP2)

MANUFACTURE WOLF SA is a watch manufacturing company, located in Biel/Bienne, Switzerland.

We are a Member of the Responsible Jewellery Council (RJC). The RJC is a standards-setting organisation that has been established to advance responsible ethical, human rights, social and environmental practices throughout the diamond, gold and platinum group metals jewellery supply chain.

The RJC has developed a benchmark standard for the jewellery supply chain and credible mechanisms for verifying responsible business practices through third party auditing.

As an RJC Member, we commit to operating our business in accordance with the RJC Code of Practices. We commit to integrating ethical, human rights, social and environmental considerations into our day-to-day operations, business planning activities and decision-making processes.

### 2 Anti-Bribery & Facilitation Payment (COP11)

In accordance with Swiss Law, MANUFACTURE WOLF SA prohibits the offer of any bribe or facilitation payment, whether cash or other inducement:

- to or from any person or company, wherever they are situated and whether they are a public official or body or private person or company,
- by any individual employee, agent or other person or body acting on MANUFACTURE WOLF SA's behalf,
- in order to gain any commercial, contractual or regulatory advantage for MANUFACTURE WOLF SA in a way which is unethical,
- or in order to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with MANUFACTURE WOLF SA.

#### 2.1 Further Clarification

We recognise that market practice varies across the territories in which it does business and what is normal and acceptable in one place may not be in another.



This policy prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action which may not be solely in the interests of MANUFACTURE WOLF SA or of the person or body employing them or whom they represent.

This policy is not meant to prohibit the following practices providing they are customary in a particular market, are proportionate and are properly recorded:

- normal and appropriate hospitality
- the giving of a ceremonial gift on a festival or at another special time;
- we consider the maximum limit for these categories to be CHF 200.

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to the Managing Director who has responsibility for this policy before proceeding.

To encourage and promote transparency in this matter, MANUFACTURE WOLF SA will organize at each end of the year a tombola where gifts received from the suppliers for the holiday season are equally and randomly shared through all employees.

## ***2.2 Employee Responsibility***

The prevention, detection and reporting of bribery is the responsibility of all employees throughout MANUFACTURE WOLF SA. In case of any attempt by any person or agency to offer an inappropriate gift in whatever form, the employee shall immediately inform the Managing Director and/or make an entry in the appropriate section of the Bribery and Facilitation Payment Reporting Form. The identity of the person reporting such event will be kept confidential if so required.

Employees refusing to participate in bribery or facilitation payments are supported by MANUFACTURE WOLF SA and employees have been made aware that they will not suffer demotion, penalty or other adverse consequences for voicing a concern, or for refusing to pay a bribe or facilitations payment even if this action may result in the enterprise losing business.

## ***2.3 Training on anti-bribery programmes:***

We commit to train all existing and new employees, to make them aware of this policy, to enable them to recognise Bribery 'Red Flags', to instil the need to report any incidents or attempted bribery and inappropriate gifts being taken or offered, and the fact that they can do so in all confidentiality and anonymity.

### 3 Diversity, Equity and Inclusivity Policy (COP23)

We will promote worker diversity, equity and inclusivity at all levels of the organisation and across functions including (but not limited to) recruitment, professional development and mobility, and equitable employment conditions.

### 4 Health and Safety (COP24)

We commit:

- To prevent accidents and cases of work-related ill health and provide adequate control of health and safety risks arising from work activities.
- To provide adequate training to ensure employees are competent to do their work.
- To engage and consult with employees on day-to-day health and safety conditions and provide advice and supervision on occupational health.
- We acknowledge the right of our employees and/or contractors to stop work in situations that may cause serious harm or uncontrolled hazards, and our personnel must be informed of their responsibility to signal any such situations.
- To implement emergency procedures on evacuation in case of fire or another significant incident.
- To maintain safe and healthy working conditions, provide and maintain plant, equipment and machinery as may be, and ensure safe storage/use of substances.
- To hereby confirm Mr. Jean-Quentin Reytrat as the Health & Safety Coordinator of MANUFACTURE WOLF SA.

### 5 Environmental Management (COP25)

We fully support the principles of and we are committed to promoting good environmental practices and sustainability in the conduct of our activities. It is MANUFACTURE WOLF SA's policy to ensure that any adverse effects on the environment are kept to a minimum during the course of its activities.

MANUFACTURE WOLF SA therefore:

- Wholly supports the requirements of accepted international standards and current Swiss environmental legislation and codes of practice.
- Minimizes consumption through the reduction, re-use or recycling of materials as much as possible.



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- Encourages efficient use of energy, utilities and natural resources, especially where these are non-renewable.
  - Seeks to prevent pollution by reducing the amount of waste arising from its activities.
  - Operates a travel-policy that takes account of environmental issues as far as reasonably practical and encourages where possible the use of feasible alternative means of transport.
  - As far as possible purchases products and services that do the least damage to the environment and encourages others to do the same.
  - Ensures that all employees understand our environmental policy and conform to the high standards required.

Biel/Bienne, February 26<sup>th</sup> 2026

Mr. Daniel Uebelhart

Managing Director MANUFACTURE WOLF SA