



FURA CORPORATE POLICY MANUAL

2025



“Sustainability, integrity and responsibility are at the heart of FURA Gems operations, which strive to create lasting value for our communities, employees and stakeholders.”

**Gaurav Gupta, Chairman,
FURA Gems**

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INTRODUCTION

INTRODUCTION

FURA Gems stands as a leading global supplier of responsibly mined colored gemstones, uniquely positioned as the first and only company producing emeralds, rubies, and sapphires on three continents. As a young but pioneering mining enterprise, FURA understands that our luxury brand clients and Maisons demand not just the finest gemstones but also the highest standards of ethical sourcing and transparency. Our corporate policies are woven into our business model, reflecting our grounded commitment to sustainability, and convey our dedication to operating with integrity and foresight, ensuring that each gemstone we bring to market enhances our partners' trust in our brand and our supply chain.

Our robust framework creates tangible business value that sets FURA apart in the industry. We implement end-to-end traceability – every gem is tracked from mine to market – which allows luxury brands to confidently source our stones knowing they adhere to responsible labor and environmental practices. Through initiatives such as our local skills development programs and water conservation efforts at mining sites, we demonstrate how responsible practices translate into real-world impact. FURA's commitment not only adds measurable value for our clients, who can proudly tell the story of ethically sourced gems in their collections, it reduces our operational risks and protects our reputation.

Our practical approach fortifies risk governance and operational integrity through policies aligned with the Responsible Jewellery Council's Code of Practices and leading international standards. This governance structure ensures accountability at all organizational levels while providing a structured and credible foundation, safeguarding long-term performance, while advancing our vision to become the industry benchmark for responsible gemstone mining.



Mission

FURA Gems responsibly mines and supplies the world’s finest rubies, sapphires, and emeralds—ensuring authenticity, responsible sourcing, and lasting value. Through innovation, craftsmanship, and education, we empower communities, elevate industry standards, and offer gemstones that are as sustainable as they are exceptional.

Vision

To be the pioneering force in responsible mining of colored gemstones, transforming lives around our mines, and inspiring the world to celebrate the extraordinary colors and stories within each gem.

Principles

FURA’s core principles reaffirm our commitment to ethical excellence and forward-looking stewardship; we operate with unwavering integrity, ensuring transparency in every transaction and interaction. We maintain full traceability of our gemstones and enforce strict responsible mining practices to protect people and the environment at every step. We champion accountability and continuous improvement, aligning our actions with international best practices and RJC compliance obligations. By cultivating respect for communities, fostering safe workplaces, and safeguarding the ecosystem, we ensure that each FURA gemstone embodies trust, fairness, and authenticity.





ACRONYMS AND KEY DEFINITIONS

ACRONYMS

RJC – Responsible Jewellery Council

RJC COP – Responsible Jewellery Council Code of Practices

ASM – Artisanal and Small-Scale Mining

CAHRA – Conflict-Affected and High-Risk Areas

GRI – Global Reporting Initiative

HIRA – Hazard Identification & Risk Assessment

OECD – Organisation for Economic Co-operation and Development

SMART – Specific, Measurable, Achievable, Relevant, Time-bound

PPE – Personal Protective Equipment

SDS – Safety Data Sheet

TSF – Tailings Storage Facility

COP – Code of Practices

EU – European Union

GHG – Greenhouse Gas

KPI – Key Performance Indicator

TSF – Tailings Storage Facility

FPIC – Free, Prior, and Informed Consent

KYC – Know Your Customer

HSE – Health, Safety, and Environment

IHSE – Integrated Health, Safety, and Environment

ESG – Environmental, Social, and Governance

CSR – Corporate Social Responsibility

CEO – Chief Executive Officer

HR – Human Resources



KEY DEFINITIONS

The following are key definitions for terms used in this policy manual

- **Adaptive Management:** A flexible, data-driven approach to tailings monitoring and rehabilitation, preventing excessive long-term liabilities
- **Artisanal and Small-Scale Mining (ASM):** refers to formal or informal mining activities conducted by individuals, groups, or cooperatives using low-tech, labour-intensive methods. ASM includes both artisanal mining, typically non-mechanised and community-based, and small-scale mining, which may involve limited mechanisation and more structured operations. In alignment with the Responsible Jewellery Council Code of Practices (COP 35), FURA distinguishes legitimate ASM from illegal mining (which violates national laws), unauthorised mining (which lacks required permits and consents but may not be criminal in intent), and mining activities funded through opaque or criminal sources, including those linked to organised crime, armed groups, or illicit financial networks. FURA's engagement is limited to lawful, responsible ASM operators that align with its ethical standards.
- **Bribery:** Offering or receiving anything of value to influence business decisions.
- **CAHRA:** Conflict-Affected and High-Risk Areas are regions identified as experiencing armed conflict, widespread violence, or other risks of harm to people. This includes areas with weak governance, corruption, political instability, or systemic human rights abuses. In line with the Responsible Jewellery Council Code of Practices (COP 7) and the OECD Due Diligence Guidance, CAHRAs require enhanced due diligence for sourcing activities.
- **Child Labour:** The employment of anyone below the minimum legal working age, or any work that deprives children of their childhood, education, or is harmful to their health or development.
- **Community Development:** Community Development refers to FURA GEMS's contribution to the long-term social and economic wellbeing of communities in its area of influence. As guided by COP 10 of the Responsible Jewellery Council Code of Practices, this includes supporting locally relevant initiatives, aligning with community and government priorities, and avoiding harm while enabling shared value creation.
- **Consultant:** An external individual or firm engaged to provide expert advice, assessments, or strategic input, often on a short-term or project-specific basis.

- **Contactor:** An individual or company engaged to provide specialized services or labour under a formal agreement, typically with defined deliverables, scope, and duration (e.g. security services, transport, technical support).
- **Discrimination:** Unfair treatment based on race, gender, religion, age, disability, nationality, sexual orientation, political beliefs, or other protected characteristics
- **Environmental Management:** FURA's commitment to responsible mining practices that minimize environmental impact and protect biodiversity, within the limits of operational feasibility.
- **Ethical Recruitment & Employment:** It refers to the practice of hiring and employing workers in a manner that upholds human dignity, avoids coercion or deception, and complies with national and international labour standards. This includes ensuring that employment is freely chosen, that workers are not charged recruitment fees, that terms and conditions are clearly communicated in a language they understand, and that all recruitment practices are transparent, fair, and free from discrimination or exploitation.
- **Ethics and Compliance Committee:** The Ethics and Compliance Committee at FURA Gems is a cross-functional body established to uphold the company's commitment to ethical conduct, regulatory compliance, and transparent grievance resolution. Comprising three members drawn from key functions such as HR, ESG, Legal, and Finance, the committee is responsible for overseeing the implementation of ethical standards and internal policies across operations. Its mandate includes reviewing and enforcing the Grievance Management Policy and related frameworks, providing guidance on risk management and regulatory compliance, overseeing policy implementation and serving as the primary escalation point for unresolved grievances or ethical concerns. The committee operates in accordance with FURA's governance procedures and supports continuous improvement in business integrity and stakeholder accountability.
- **Facilitation Payments:** Small payments made to expedite routine government actions.
- **Forced Labor:** Work performed under threat, coercion, deception, or involuntary servitude
- **Freedom of Association:** Employee right to form, join, or refrain from joining labor unions without interference and in accordance with national laws.
- **Gender Equality:** Equal rights, responsibilities, and opportunities for people of all genders, without discrimination or bias.
- **GHG Reduction:** Measures to reduce greenhouse gas emissions from mining and processing activities.
- **Good Faith:** Reporting based on a reasonable belief of wrongdoing, supported by available facts or evidence.
- **Grievance:** Any substantiated concern, complaint, or issue raised by impacted employees or external stakeholders regarding FURA's activities or impacts including

workplace concerns that affect productivity, legal compliance, or workforce well-being, addressed through a structured resolution framework.

- **Hazardous Substance:** Any material posing risk to health or the environment.
- **Harassment:** Unwanted conduct – verbal, physical, or visual – that offends, humiliates, or intimidates another person in the workplace or work-related setting.
- **Health, Safety & Environment (HSE):** The structured framework of policies, procedures, and practices aimed at ensuring occupational health, workforce safety, and environmental protection.
- **Hierarchy of Controls:** Risk management system prioritizing elimination, substitution, engineering controls, administrative controls, and PPE.
- **High-Risk Whistleblower Case:** Allegations that involve senior leadership, significant legal risks, or potential regulatory violations requiring enhanced oversight.
- **HR / CSR Manager:** A FURA Human Resources (HR) or Corporate Social Responsibility (CSR) employee responsible for receiving and managing employee and external grievance processes respectively.
- **Human Rights:** Universal rights and freedoms inherent to all individuals as outlined in the Universal Declaration of Human Rights and other international frameworks.
- **Indigenous Relations and Cultural Heritage:** It refers to FURA GEMS's commitment to respectfully engaging with indigenous people and protecting their tangible and intangible cultural heritage, including sacred sites, traditional knowledge, and customs. In alignment with the Responsible Jewellery Council Code of Practices FURA ensures that indigenous rights are recognised, and appropriate consultation is undertaken where its activities may impact indigenous communities or heritage.
- **Know Your Customer (KYC):** A risk-based due diligence process to verify clients, vendors, and partners in proportion to potential exposure levels.
- **Market-Based Fair Compensation:** Wages and benefits aligned with local labor standards ensuring competitiveness.
- **Material Grievance:** A grievance that presents a credible, documented impact on FURA's business operations or legal compliance.
- **Mine Closure & Rehabilitation:** The planned and financially responsible decommissioning and restoration of mining sites after operations as per National law.
- **Personal Protective Equipment (PPE):** Safety equipment and gear required to minimize exposure to workplace hazards, including helmets, gloves, respirators, and protective eyewear.
- **Proportional (Enhanced) Due Diligence:** It refers to additional risk mitigation measures applied to high-risk suppliers, contractors, or transactions, based on the nature, scale, and severity of the identified risk. These measures may include independent verification, on-site assessments, origin documentation, or senior-level

approvals, and are designed to ensure compliance without creating unnecessary administrative burden for low-risk engagements.

- **Reporting Channels:** These are the official and accessible methods through which employees, contractors, or external stakeholders can raise concerns, grievances, or whistleblower reports. These may include designated email addresses, in-person reporting to supervisors or HR, SMS, or secure grievance boxes. Anonymous reporting is available for whistleblowers who wish to protect their identity.
- **Responsible Procurement:** Procuring goods/services considering social, economic, and environmental factors alongside cost and quality.
- **Risk Based Consequence Classification:** Tailings risks are categorized based on operational, financial, and environmental impact, ensuring resource allocation is proportional to risk level.
- **Risk Based Due Diligence:** Processes to identify, prevent, and mitigate human rights risks.
- **Risk Based Hazard Identification & Risk Assessment (HIRA):** A targeted process of identifying workplace hazards, evaluating risks, and implementing control measures.
- **Risk-Based Significance Rating:** A categorization system ensuring grievances are assessed proportionally to their potential impact on business, legal standing, and stakeholder relations (Levels 1-4).
- **Risk-Based Supply Chain Due Diligence:** It refers to a tiered framework used to identify, assess, and mitigate supplier risks in proportion to their exposure level or location (e.g. CAHRA).
- **SDS:** Safety Data Sheet providing handling information.
- **SMART:** SMART is a goal-setting framework used to ensure objectives are well-defined and actionable. It stands for Specific, Measurable, Achievable, Relevant, and Time-bound, and is commonly applied in planning, performance management, and evaluation processes to improve accountability and results tracking.
- **Stakeholder Engagement:** It refers to the process of building respectful, transparent, and inclusive relationships with individuals or groups who are affected by or can affect FURA Gems operations. In line with the Responsible Jewellery Council Code of Practices COP 32, engagement must be culturally appropriate, ongoing, and responsive to stakeholder concerns, particularly in affected communities.
- **Stakeholders:** Individuals or groups materially affected by FURA's operations
- **Supplier:** An entity that provides goods, materials, or inputs as part of the company's supply chain, typically under a purchase order or supply agreement.
- **Tailings Storage Facility (TSF):** Engineered structures for storing tailings.
- **Tailings:** Ground rock and effluents produced during ore processing.

- **Tiered Due Diligence Requirements:** It ensures that vendors, contractors, and third-party agents undergo screening procedures aligned with their assigned risk tier, enabling efficient approvals while maintaining regulatory and ethical compliance.
- **Traceability:** Ability to track materials from origin through the supply chain.
- **Vendor:** A general term often used interchangeably with supplier but may also include entities providing both goods and non-specialized services (e.g. office supplies, catering).
- **Water Management:** The efficient management of water resources, ensuring operational needs are met while minimizing waste.
- **Whistleblower:** Any individual who reports a credible concern in good faith under this policy.
- **Zero Harm:** A measured commitment to eliminating workplace injuries, occupational illnesses, and environmental harm within the limits of the company's capacity.





CORPORATE POLICIES

1. FINANCIAL INTEGRITY AND ANTI-CORRUPTION POLICY

PURPOSE: FURA GEMS is committed to financial integrity, operational transparency, and risk-based compliance with international financial and anti-corruption regulations. This policy provides a practical framework for business efficiency while ensuring alignment with applicable national laws and regulations.

SCOPE: This policy applies to all FURA employees, board members, contractors or any service provider involved in financial transactions, business dealings, or contractual agreements with the company.

POLICY PROVISIONS:

- **Zero Tolerance for Bribery & Corruption:** No employee or agent may offer, solicit, or accept bribes or kickbacks.
- **Ethical Business Conduct:** Business transactions must be transparent, well-documented, and free from conflicts of interest, while ensuring business agility.
- **Tiered Due Diligence Requirements:** Vendors, contractors, to undergo risk-proportionate screening to ensure efficient approval processing while maintaining compliance.
- **Prohibited Practices:**
 - Bribery & kickbacks of any kind
 - Unauthorized Facilitation Payments (except where explicitly legal)
 - Gifts & hospitality beyond established limits
 - Political contributions made on the company's behalf without formal approvals
 - Engagement with high-risk third parties without enhanced due diligence
- **Gift Limits:** All gifts valued above USD 100 must be registered with either Group HR or Group CFO.
- **Hospitality:** Hospitality events – including business-related meals, travel, in-kind support, or entertainment offered to employees or external stakeholders – must be approved by the CHRO (for employees) or CFO (for external stakeholders) if valued above USD 100.00, and by the CEO if valued above USD 1,000.00.



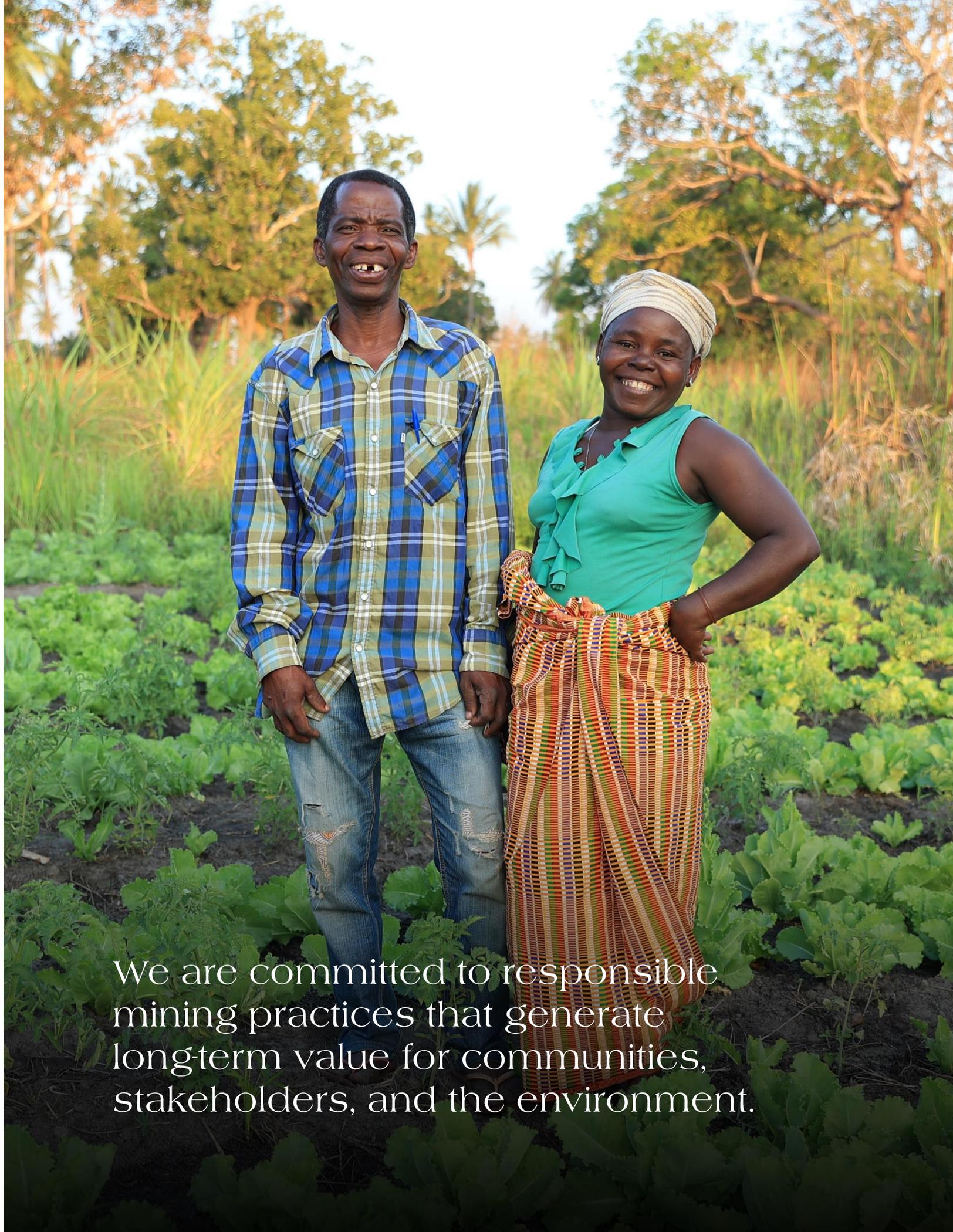
IMPLEMENTATION:

Key Responsibilities

- **Compliance & Legal:** Monitor regulations, investigate violations, conduct risk-based policy execution.
- **Finance Department:** Implement practical financial controls that balance compliance with business agility, report suspicious activities.
- **All Employees:** Comply with policies, report risks, and complete targeted training.

Compliance Measures

- **Transaction Recording:** All business transactions accurately recorded as per guidance provided by CFO in line with IFRS standards.
- **Training Requirements:** Targeted anti-bribery training for employees engaging in high-risk transactions.
- **Risk Based Monitoring & Auditing:** Annual independent audits (statutory audits) and spot-check reviews for transactions exceeding risk thresholds.
- **Proportional (Enhanced) Due Diligence:** Vendors and partners to undergo tiered risk assessments based on their business exposure.
(See FURA Gems [★Responsible Procurement and Supply Chain Management Policy](#))
- **Enforcement:** Zero tolerance for intentional violations – offenders face immediate termination and potential legal consequences.
(See FURA Gems [★Whistleblowing Policy](#))



We are committed to responsible mining practices that generate long-term value for communities, stakeholders, and the environment.

2. RESPONSIBLE PROCUREMENT AND SUPPLY CHAIN MANAGEMENT POLICY

PURPOSE: FURA Gems is committed to responsible procurement by promoting risk-based due diligence, and ethical supplier engagement while ensuring operational efficiency and supply chain resilience.

SCOPE: Applies to all FURA employees, contractors, suppliers engaged in procurement activities across all operations and locations.

POLICY PROVISIONS:

- **Ethical Standards:** All procurement activities must comply with FURA's ethical principles, including human rights, anti-corruption, and environmental stewardship.
- **Risk Based Due Diligence:** Implement tiered due diligence process aligned with RJC Codes of Practices focusing enhanced scrutiny on high-risk suppliers while ensuring efficiency for low-risk partners.
- **Proportional Enhanced Due Diligence:** High-risk suppliers and CAHRA areas require additional scrutiny, including third-party verification where necessary, material origin documentation, and site inspections as appropriate. Low-risk suppliers follow simplified verification processes to maintain supply chain agility.
- **Strategic Local Procurement:** Prioritize local suppliers where commercially viable and quality aligned to support host communities.
- **Contractor Engagement:** FURA will require contractors, and where appropriate, suppliers, vendors, and consultants, to align with its ethical and operational standards in proportion to their level of risk and engagement.
- **Zero Tolerance for Human Rights Violations:** No procurement from suppliers engaged in forced/child labor, human trafficking, or gross human rights abuses.

IMPLEMENTATION:

Key Responsibilities

- **Mine Directors:** Oversee policy implementation, ensure resource allocation.
- **Procurement Managers:** Conduct due diligence, monitor supplier performance.
- **Employees/Contractors:** Adhere to standards, report non-compliance.
- **Contractors:** Comply with FURA's ethical standards, collaborate on improvement initiatives.

Compliance Measures

- Align with FURA Anti-Corruption and Anti-Bribery Policies, RJC Code of Practices, and relevant national regulations while maintaining business agility.
- Conduct risk-based supplier assessments classifying suppliers by risk tier, applying enhanced due diligence reviews where necessary.
- Maintain an RJC compliant contractor and supplier database.
- Implement monitoring mechanisms including audits and site visits as required by risk level, avoiding unnecessary administrative burden.
- Provide targeted training on responsible procurement practices.
- Make FURA's grievance mechanism available to contractors to ensure supply chain transparency.
- Review policy as appropriate with updates approved by Ethics and Compliance Committee.

3. WHISTLEBLOWING POLICY

PURPOSE: FURA GEMS is committed to maintaining a safe, confidential, and responsible process for reporting unethical, illegal, or unsafe practices while ensuring fair treatment of all parties involved. This policy reinforces transparency, accountability, and compliance with the Responsible Jewelry Council (RJC) Code of Practices, while safeguarding FURA from reputational and operational risks.

SCOPE: This policy applies to all FURA employees and contractors. It covers material breaches of company policies, including corruption, fraud, environmental violations, human rights abuses, discrimination, harassment, and other substantiated misconduct.

POLICY PROVISIONS:

- **Confidentiality & Non-Retaliation:** All reports will be treated confidentially. Retaliation is strictly prohibited and will result in disciplinary action. However, intentional misuse of whistleblower protections (e.g., false reports or personal grievances) may result in disciplinary action.
- **Reporting Channels:** Reports may be submitted through multiple confidential channels.
- **Proportional Third-Party Oversight:** High-risk cases may undergo external third-party review where necessary, but routine internal cases will be handled by FURA's Ethics and Compliance Committee to maintain operational efficiency.
- **Investigation Process:**
 - Reports acknowledged within 48 hours, with an initial feasibility assessment before a full investigation.
 - Impartial investigation carried out where credible evidence is provided. Minor workplace disputes or unsubstantiated claims will not undergo full internal review.
 - Resolution provided within 60 days, depending on case complexity.
- **Appeals Process:**
 - Whistleblowers may escalate unresolved complaints within 60 days of receiving a resolution.

- Appeals must be submitted via appeals@furagems.com or through the company's Ethics & Compliance web portal.
- Appeals will be reviewed by an Independent Appeals Panel where necessary, consisting of:
 - A third-party compliance expert or legal auditor.
 - A Board-level Ethics & Compliance representative.
 - An HR professional uninvolved in the initial case.
- The panel will review the case, conduct further inquiries if necessary, and provide a final decision within 60 days.
- **Training & Communication:** Regular training sessions for awareness. Policy communicated via internal channels.

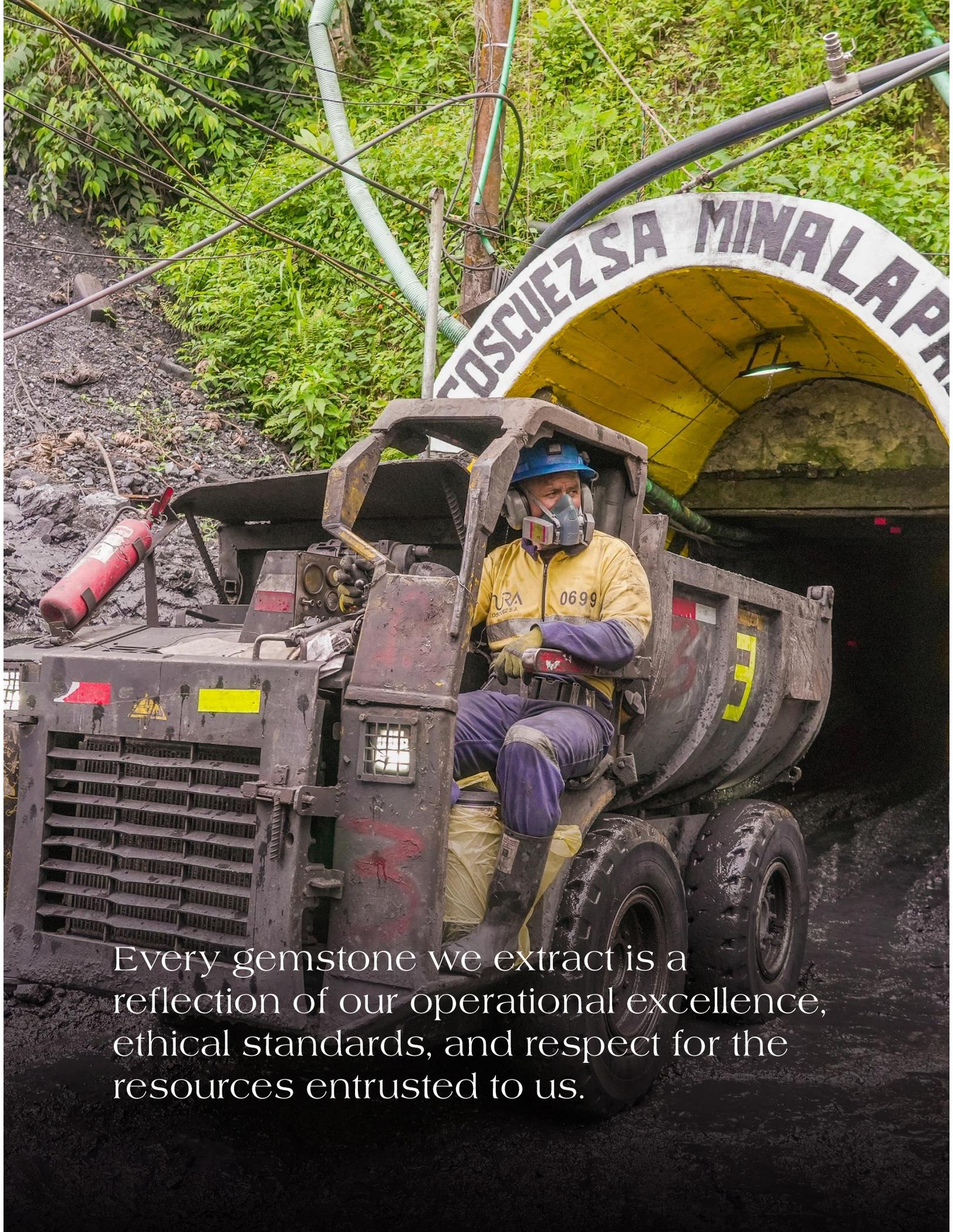
IMPLEMENTATION:

Key Responsibilities

- **Whistleblowers:** Provide detailed and factual information to facilitate investigations.
- **Managers/Supervisors:** Foster a culture of openness and encourage reporting and ensure efficient case resolution.
- **Ethics and Compliance Committee:** Oversee policy implementation, monitor investigations, and ensure alignment with RJC standards.

Compliance Measures

- **Monitoring & Review:** Compliance monitored by the Ethics and Compliance Committee. Confidential reporting to the CEO and Leadership Team as necessary.
- **Reporting:** FURA Gems will report annual in line with reporting standards
- **Sanctions:** Whistleblowers who intentionally submit false or malicious claims may face internal disciplinary action.



Every gemstone we extract is a reflection of our operational excellence, ethical standards, and respect for the resources entrusted to us.

4. WORKFORCE AND LABOR RIGHTS POLICY

PURPOSE: FURA GEMS is committed to ethical, fair, and commercially sustainable workforce management across its global operations. This policy upholds international labor rights standards while ensuring practical implementation that supports business efficiency, workforce stability, and operational growth.

SCOPE: This policy applies to all FURA employees and contractors across all operational jurisdictions, including mining sites, sorting facilities, and corporate offices, while ensuring local adaptations where necessary.

POLICY PROVISIONS:

Guiding Principles

- **Zero Tolerance for Discrimination & Retaliation:** All employees have the right to work in an environment free from harassment, discrimination and retaliation.
- **Market-Competitive Fair Working Conditions:** Employees receive locally competitive wages and benefits that align with legal requirements and operational sustainability.
- **Right to Fair Working Conditions:** Employees are entitled to fair compensation, reasonable working hours, and safe conditions.
- **Commitment to Ethical Recruitment & Employment:** Employment must be freely chosen with no forced or bonded labor.
- **Structured & Transparent Disciplinary Procedures:** Employee accountability through clear, structured, and equitable processes aligned with operational realities, ensuring productivity while upholding fair treatment.

Employment Rights & Protections

- **Equal Opportunity & Non-Discrimination:** Merit-based employment decisions with structured grievance processes for discrimination reports; mandatory anti-bias hiring training for HR teams.



- **Freedom of Association & Collective Bargaining:** Right to form/join labor unions with good-faith negotiations.
- **Protection Against Forced Labor:** Prohibition of all forms of forced labor, debt bondage, and human trafficking implementing risk-based supplier screening.
(See FURA Gems [★Responsible Procurement and Supply Chain Management Policy](#))
- **Whistleblower Protection:** Confidential reporting mechanisms with protection against retaliation, ensuring alignment with FURA's Whistleblowing Policy.
(See FURA Gems [★Whistleblowing Policy](#))
- **Employment Contracts:** All employees receive clear, compliant written employment contracts prior to commencing work ensuring mutual expectations and compliance with local labor laws and RJC Guidance.

Working Conditions & Standards

- **Working Hours & Overtime:** FURA Gems shall comply with applicable national laws on working hours. Where no such law exists, the standard workweek shall not exceed 48 hours, excluding overtime. All overtime shall be voluntary and compensated in accordance with local legal requirements.
- **Flexible Rest & Leave Entitlements:** Employees receive adequate rest and leave entitlements as per local legal frameworks and operational feasibility.
- **Health & Safety Considerations:** Special provisions for shift work and high-risk operations as per national law.

IMPLEMENTATION:

Key Responsibilities

- **HR:** Conduct compliance audits, manage employee grievance procedures, and ensure HR policy implementation.
- **All Employees:** Adhere to policy provisions and report violations.
- **Contractors:** Key contractors are required to demonstrate commitment to labor standards, with a risk-based approach to audits and compliance verification.

Compliance Measures

- Regular risk based internal audits ensuring workforce conditions are appropriately monitored commensurate with risk exposure to avoid excessive administrative burden.
- Annual policy review to incorporate legislative updates.
- Structured disciplinary procedures with due process and appeals mechanisms.
- Confidential grievance processes with protection against retaliation.
- Specialized harassment investigation training for HR personnel.
- Induction training with regular refreshers.



5. SOCIAL PERFORMANCE AND COMMUNITY POLICY

PURPOSE: FURA GEMS is committed to responsible stakeholder engagement, fostering long-term economic and social value in its operational areas. This policy provides a structured framework for managing community relations, social risks aligned with business sustainability and risk mitigation.

SCOPE: This policy applies to all FURA employees, contractors, working with communities in the area of influence in all locations where FURA operates.

POLICY PROVISIONS:

Guiding Principles

- **Respect for Rights:** Uphold the rights of Indigenous Peoples and local communities while ensuring alignment with business objectives.
- **Transparency & Strategic Engagement:** Maintain structured community dialogue, ensuring investments align with operational priorities and grievance mechanisms are in place.
(See FURA Gems [★Grievance Management Policy](#))
- **Impact Investment:** Prioritize economic opportunities that support sustainable risk management, align with FURA's business model and demonstrate potential to generate positive impacts beyond the life of mine.
- **Risk-Based Approach:** Manage security, environmental, and human rights impacts by conducting Environmental and Social Impact Assessments (ESIA) for all new assets according to national standards, while developing Health, Safety, and Environment (HSE) guidelines aligned with World Bank sector-specific requirements.
- **Evidence Based Decision-making:** Understand the local context, support local investment decisions and manage risks.
- **ASM:** FURA Gems recognises the presence of artisanal and small-scale mining (ASM) in some of its areas of operation and is committed to engaging constructively with legitimate ASM actors, where appropriate, in a manner that is aligned with the

Responsible Jewellery Council Code of Practices (COP 35) on Artisanal and Small-Scale Mining.

Key Commitments

- **Stakeholder Engagement:** Implement meaningful consultation through periodic direct consultation events, mapping, and Local Advisory Committees.
- **Impact Driven Community Investment:** Allocate an annual budget to community investments prioritizing strategic long-term initiatives that support operational requirements. Align community investments with local government development priorities based on community needs assessments and baseline data.
- **Indigenous Relations:** Respect cultural heritage through protection frameworks.
- **Grievance Management:** Maintain efficient, accessible and appropriate mechanisms for reporting and resolving concerns.

IMPLEMENTATION:

Key Responsibilities

- **Country Director:** Ensure resources and funds are available for implementation aligned with impact driven model.
- **Social Performance Managers:** Lead community engagement, manage the implementation of community investment projects and develop a context specific, risk-based approach.
- **Security Teams:** Implement security protocols aligned with Voluntary Principles on Security and Human Rights.
- **All Staff:** Uphold policy principles in all community interactions.

Compliance Measures

- Undertake structured and strategic continuous stakeholder engagement focusing on measurable impact.
- Implement monitoring systems with clear KPIs.
- Maintain transparent grievance mechanisms and conflict resolution frameworks.

6. GRIEVANCE MANAGEMENT POLICY

PURPOSE: FURA GEMS is committed to a structured grievance mechanism, ensuring fair, accessible, and timely resolution of legitimate concerns while protecting the company's operational integrity and efficiency.

SCOPE: This policy applies to all FURA employees and external stakeholders interacting with our operations globally. It covers environmental, social, operational, and governance issues while accommodating national laws.

POLICY PROVISIONS

- FURA commits to resolving grievances within 30 days of receipt, extendable to 60 days for complex cases, with prioritization based on significance rating and business impact except where otherwise stated in national law.
- Grievances can be lodged through grievance boxes, in-person meetings, SMS, or email.
- Only grievances with clear business, legal, or social impact will be formally processed, reducing administrative inefficiencies.
- FURA's **HR / CSR Manager** will ensure timely feedback to complainants during the resolution process.
- Retaliation against complainants is strictly prohibited, and deliberate submission of false or malicious claims may result in appropriate action.
- Community awareness initiatives will focus on legitimate grievance submission, reducing misuse of the mechanism and ensure all community members understand and can access the grievance mechanism, regardless of literacy levels, language barriers, or technological constraints.

IMPLEMENTATION

Key Responsibilities

- CEO: Provide final decisions on Level 4 grievances.
- Country Director, Group Legal: Review and resolve Level 3 grievances.
- Mine Manager/In-Country Legal: Address Level 2+ grievances.
- HR / CSR: Receive, log, investigate grievances; communicate progress to complainants.

Compliance Measures

Risk-Based Grievance Processing:

- Level 1: Minor issues, resolved at site level within 15-30 days.
- Level 2: Operational concerns requiring management intervention, resolved within 30 days.
- Level 3: Complex regulatory, legal, or reputational issues requiring senior oversight, resolved within 60 days.
- Level 4: High-impact grievances impacting group operations beyond a single jurisdiction requiring CEO/Board-level intervention, resolution timeframe varies.

Grievance Process:

- Receipt and acknowledgment within 48 hours.
- Assessment and categorization by significance level.
- Investigation and documentation.
- Collaborative resolution with stakeholders.
- Closure with complainant sign-off.
- Follow-up monitoring as appropriate.

Monitoring and Reporting

- Periodic internal reports for operational insights by the HR / CSR
- Annual grievance reports as part of public sustainability disclosures
- Regular training for designated employees to ensure efficient and risk-based grievance handling.
- Awareness on grievance eligibility and process, reducing system abuse
- Compliance with national laws, ILO standards, while ensuring practical application.



From exploration to recovery, our processes are guided by transparency, accountability, and sustainable development principles.

7. INTEGRATED HEALTH, SAFETY AND ENVIRONMENT (IHSE) POLICY

PURPOSE: FURA GEMS is committed to practical, risk-based health, safety, and environmental (IHSE) management, ensuring workforce protection, environmental stewardship, and operational efficiency across all sites. This policy integrates health & safety compliance with commercially viable environmental sustainability, ensuring responsible mining aligned with business priorities.

SCOPE: Applies to all FURA employees across all operations, including mines, processing facilities, and corporate offices.

POLICY PROVISIONS:

Zero Harm

- Safety measures will be targeted toward high-risk operations, ensuring efficiency in compliance efforts.
- Ensure appropriate PPE is provided at all operational sites, proportionate to identified risks, and enforce its consistent use through training, supervision, and compliance monitoring
- Provide employee training and hazard identification support focused on site specific risks
- Equip supervisors with resources for health and safety responsibilities.
- Identify and manage occupational health exposures focusing on efforts on the high-risk activities to optimize operational safety management
- Monitor risks and incidents to prevent recurrence.
- Build a culture promoting health, safety, and wellbeing.

Energy Management

- Set commercially viable GHG reduction targets that align with industry best practice without overwhelming resources.



Water Management

- Conduct regular water audits and monitor water quality to ensure operational efficiency and alignment with local regulatory requirements
- Collaborate with communities through a risk-based engagement approach to responsible resource management

Waste Management

- Ensure proper segregation, handling, and disposal of all waste.
- Comply with hazardous waste transport and disposal laws
- Implement efficient recycling and waste reduction strategies that align with operational capabilities

Environmental Management

- Conduct biodiversity assessments to protect ecosystems
- Respect legally designated protected areas
- Prevent significant decline of threatened species populations using practical, site-specific measures

Emergency Preparedness

- Implement site-specific response plans for HSE risks, ensuring alignment with business continuity strategies

Mine Closure & Rehabilitation

- Develop site-specific mine closure plans in accordance with national laws and regulations
- Engage communities in closure planning for post-mining sustainability where appropriate
- Adopt cost-effective, progressive rehabilitation techniques that ensure site stability post-mining in line with national laws and regulations

IMPLEMENTATION:

Key Responsibilities

- **Country Directors:** Set key targets and allocate appropriate resources for implementation
- **HSE Managers:** Efficiently integrate policies into operations, manage inspections and training
- **HSE Officers:** Conduct inspections, risk assessments, and lead emergency drills
- **All Personnel:** Follow procedures, report hazards, participate in training

Compliance Measures

- Regular internal audit of HSE reports 24-hour incident, accident, and near-miss reporting
- Establish SMART (Specific, Measurable, Achievable, Related, and Time-bound) HSE goals with supporting processes aligned with business priorities
- Monthly consolidated HSE management reporting, prioritizing material risks
- Employee training on environmental and safety best practices

8. TAILINGS MANAGEMENT POLICY

PURPOSE: FURA GEMS is committed to safe, risk-based, and tailings management, ensuring operational stability, regulatory compliance, and environmental responsibility. This policy ensures efficient containment, monitoring, and closure of tailings storage facilities (TSFs) while maintaining business feasibility.

SCOPE: This policy applies to all FURA operations, contractors, and stakeholders involved in tailings management ensuring cost-effective risk mitigation across all geographical locations and mining activities

POLICY PROVISIONS:

- **Efficient and Safe TSF Design and Construction:** Where necessary, TSFs will be designed using a cost-effective, risk-based approach, ensuring safety through best available technology while avoiding over-engineering.
- **Risk Management:** Risk assessments will be conducted proportionally to operational exposure, with annual independent inspections as required by law and local regulations.
- **Environmental Protection:** Prevent acid rock drainage, seepage, and other environmental impacts. Strict prohibition of riverine and marine disposal of tailings, in compliance with international standards.
- **Stakeholder Engagement:** Ensure community engagement aligned with business impacts, undertaking Free, Prior, and Informed Consent (FPIC) in jurisdictions as required.
- **Monitoring and Surveillance:** Maintain monitoring systems to detect TSF stability risks, ensuring cost effective data efficiency and automated reporting where possible and as required.
- **Emergency Preparedness:** Implement site-specific response plans for tailings risks where appropriate, ensuring alignment with business continuity strategies.

IMPLEMENTATION:

Key Responsibilities

- **Mine Director:** Responsibility for cost effective governance and performance of TSFs.
- **Engineer of Record:** Technical oversight, including inspections and audits and geotechnical stability review process as required.
- **HSE Manager:** Manages health, safety, and environmental aspects.
- **Social Performance Team:** Ensures effective stakeholder engagement and grievance mechanisms proportional to TSF impacts
- **All Employees and Contractors:** Adhere to policy and report concerns, while ensuring operational efficiency

Compliance Measures

- **Standards Compliance:** Adhere to national regulations, and RJC COP 39.
- **Risk-Based Planning & Site Selection:** Tailings management strategies will be aligned with business feasibility, avoiding excessive costs where risks are minimal.
- **Operation:** Implement operational controls and water management plans; conduct regular safety reviews.
- **Pragmatic Closure & Post-Closure:** Develop cost efficient designs for long-term stability; engage independent third-party verification of closure effectiveness as necessary. Ensure progressive reclamation and monitoring.
- **Training:** Regular training for employees and contractors tailor to site specific needs; community awareness programs as appropriate.
- **Monitoring:** Appropriate monitoring using advanced technologies, including annual independent TSF audits.

9. HAZARDOUS CHEMICALS MANAGEMENT POLICY

PURPOSE: FURA GEMS is committed to safe, risk-based, and commercially viable hazardous chemicals management, ensuring employee protection, environmental responsibility, and operational efficiency. This policy ensures practical chemical handling, storage, and disposal measures aligned with business priorities while maintaining RJC COP 23 & 25 compliance.

SCOPE: Applies to all FURA employees, contractors, and visitors involved in activities where hazardous chemicals are present across all operations ensuring safety, compliance, and business feasibility.

POLICY PROVISIONS:

Inventory & Documentation

- Maintain current hazardous substance inventory with HSE Manager
- Ensure accessible Safety Data Sheets where chemicals are used
- Conduct inventory audits based on chemical risk classification when chemicals are added/removed

Safe Handling & Storage

- Store high risk chemicals in designated, ventilated areas strict containment measures while allowing flexible handling for low-risk substances
- Implement spill containment measures and ensure labeled containers
- Maintain first-aid stations, emergency showers, and eyewash stations in risk areas

Hazardous Waste & Emissions

- Use only licensed disposal providers for hazardous waste ensuring compliance with regulatory requirements.
- Implement practical and cost-effective pollution prevention measures



- Prohibit open-air burning, unauthorized landfill dumping, or untreated discharge

Emergency Preparedness

- Develop and maintain Emergency Response Plans for chemical spills
- Equip sites appropriately with spill kits and maintain emergency contacts

Risk Assessment

- Conduct annual chemical exposure risk assessments
- Plan to source alternatives to hazardous substances wherever technically feasible and economically viable.
- Implement Hierarchy of Controls in a phased and cost-effective manner

IMPLEMENTATION:

Key Responsibilities

- **Country Directors:** Ensure adequate resources and cost-effective compliance
- **HSE Manager/Supervisors:** Maintain compliance, conduct risk-based audits
- **All Personnel:** Follow chemical handling protocols, report issues immediately

Compliance Measures

- Audits and annual risk assessment as necessary
- Annual hazardous chemicals training and spill response drills for high-risk roles
Prohibition of internationally banned substances per Stockholm and Rotterdam Conventions



Natural gemstones are a gift of the earth.
Our role is to extract and deliver them
with care, responsibility, and integrity.

10. HUMAN RIGHTS POLICY

PURPOSE: FURA Gems recognizes that respect for human rights is fundamental to sustainable business operations. This policy establishes FURA's commitment to uphold human rights by preventing impacts on individuals and communities, guiding our employees and contractors to ensure FURA contributes positively to human dignity, equity, and well-being.

SCOPE: Applies to all FURA employees and contractors directly employed by us across our operations.

POLICY PROVISIONS:

Commitment to Fundamental Rights

- Commit to respect and protect civil and political rights, economic and social rights, and collective or solidarity rights in operations and supply chain where FURA holds direct operational control.
- Offer competitive wages and benefits, with working conditions that comply with country regulations
- Support freedom of association

Elimination of Exploitation and Discrimination

- Maintain zero tolerance for forced labor, human trafficking, and related abuses.
- Prohibit child labor.
- Maintain zero-tolerance for discrimination based on race, gender, sexual orientation, religion, politics, social origin, age, or other factors.

Creating a Respectful and Inclusive Work Environment

- Foster a respectful and inclusive workplace
- Zero-tolerance for harassment by employees or contractors



Health, Safety, and Environmental Stewardship

- Create a safety-based work environment
- Promote efficient and responsible resource use

Security and Human Rights

- Ensure security provisions comply with country legislation and align with Voluntary Principles on Security and Human Rights
- Engage private/public security providers consistent with business priorities and aligned to human rights principles

Accountability and Awareness

- Maintain structured reporting and investigation systems for alleged human rights concerns
- Implement corrective actions when necessary

IMPLEMENTATION:

Key Responsibilities

- **Executive Team (Ethics and Compliance Committee):** Oversee policy implementation
- **Country Directors:** Ensure local adherence and stakeholder engagement
- **Social Performance/HR Managers:** Conduct targeted training, monitor compliance, investigate reports
- **All Employees:** Follow human rights policies in daily operations, ensuring professional workplace conduct.

Compliance Measures

- Conduct human rights risk and security assessments and impact reports in line with RJC requirements.
- Conduct human rights due diligence related to security (see FURA GEMS Responsible Procurement & Supply Chain Management Policy).
- Ensure employee and contractor training during onboarding and when policy updates occur.
- Maintain a confidential grievance system accessible to all stakeholders see FURA GEMS Grievance Management Policy).
- Communicate this policy through team meetings, contractor meetings and publicly accessible channels.
- Alignment with RJC Code of Practice, Universal Declaration of Human Rights, and Voluntary Principles on Security and Human Rights.

