CODE OF PRACTICES AND SUSTAINABILITY POLICY

1. Purpose

Belmont Emeralds is committed to conducting its mining operations in full alignment with the Responsible Jewellery Council (RJC) Code of Practices 2024 and the RJC Laboratory Grown and Mining Standard (LGMS 2025), applicable to its certification scope as a Miner of Coloured Gemstones.

This Policy establishes Belmont's commitment to responsible, ethical, transparent and sustainable mining practices.

2. Scope

This Policy applies to:

- All employees
- Contractors and security providers
- Suppliers and business partners operating within Belmont's mining operations
- All activities within the certified scope

3. Legal Compliance

Belmont operates in full compliance with:

- Brazilian mining, environmental and labor legislation
- Internationally recognized human rights standards
- Applicable anti-corruption and anti-money laundering laws
- RJC Code of Practices and LGMS requirements

Belmont maintains a Legal Register and conducts periodic compliance reviews.

4. Human Rights Commitment

Belmont recognizes its responsibility to respect internationally recognized human rights, in alignment with:

- UN Guiding Principles on Business and Human Rights (UNGPs)
- ILO Core Conventions
- Applicable national legislation

Belmont commits to:

- Prohibit forced, bonded or involuntary labour
- Prohibit child labour
- Ensure non-discrimination and equal opportunity
- Respect freedom of association and collective bargaining
- Provide safe and healthy working conditions
- Engage constructively with local communities
- Prevent harassment, abuse and exploitation

Belmont implements Human Rights Due Diligence processes to identify, prevent, mitigate and address human rights risks.

5. Ethical Business Practices

Belmont maintains zero tolerance for:

- Bribery and corruption
- Facilitation payments
- Fraud or misrepresentation
- Money laundering or terrorist financing

The company implements risk-based due diligence procedures for customers, suppliers and financial transactions.

6. Environmental Stewardship

Belmont is committed to:

- Minimizing environmental impact from mining operations
- Protecting biodiversity and ecosystems
- Managing waste, water and emissions responsibly
- Promoting energy efficiency and renewable energy use
- Conducting land rehabilitation and reforestation

Environmental risks are assessed periodically, and mitigation measures are implemented through structured environmental management systems.

7. Occupational Health and Safety

Belmont is committed to providing a safe and healthy workplace by:

- Identifying and controlling operational risks

- Providing adequate training and protective equipment
- Monitoring incidents and near-misses
- Implementing emergency preparedness and response measures
- Promoting continuous safety improvement

8. Community Engagement

Belmont actively engages with local communities through:

- Transparent communication
- Educational initiatives
- Social development programs
- Stakeholder consultation processes

The company recognizes its responsibility to contribute positively to the social and economic development of the region.

9. Grievance Mechanism

Belmont provides accessible grievance mechanisms for employees, contractors and external stakeholders.

All grievances are:

- Handled confidentially
- Investigated impartially
- Addressed without retaliation
- Recorded and monitored for continuous improvement

10. Risk-Based Management Approach

Belmont applies a structured risk management process covering:

- Legal compliance
- Human rights
- Environmental impact
- Health and safety
- Financial crime and corruption

11. Monitoring and Continuous Improvement

Belmont commits to:

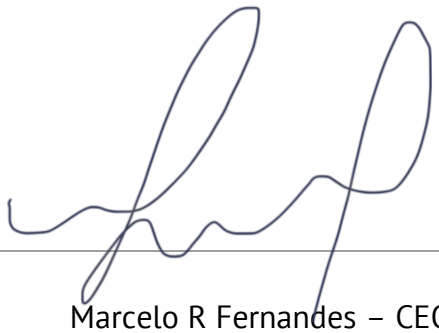
- Conducting internal audits
- Reviewing performance indicators
- Implementing corrective actions
- Holding periodic management reviews
- Continuously improving its management systems

12. Governance and Accountability

The Managing Director holds ultimate responsibility for compliance with this Policy.

An appointed RJC Compliance Officer oversees implementation, monitoring and reporting related to RJC requirements.

Approved by:



Marcelo R Fernandes – CEO

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