



SUPPLIER PRINCIPLES

STAR JEWELRY LLC DBA STANLEY CREATIONS

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ETHICAL BUSINESS PRACTICES

At iStar Jewelry LLC DBA Stanley Creations located at 31-00 47th Ave. 4th Floor in Long Island City, New York, we commit ourselves to the values expressed in our Code of Conduct (CoC), which is centered around sound business practices. Our CoC sets the foundation by which our company promotes a culture of integrity and legal compliance, which extends to our relations and interactions with our suppliers. Suppliers and business partners who do business with Stanley Creations must share our values and ethical commitments. By dealing openly and ethically ourselves, we in return expect our suppliers and business partners to:

- Comply with all applicable laws and regulations, and Stanley Creation's standards.
- Maintain independence and impartiality in all business relationships.
- Never offer or give our associates anything of value.
- Never engage in bribery or corruption, or offer anyone an improper payment or gift for the purpose of obtaining or retaining business or securing and improper advantage for Stanley Creations.
- Protect Stanley Creation's confidential information.
- Maintain accurate books and records in accordance with laws and accepted accounting principles.
- Cooperate with legitimate government investigations.

LEGAL COMPLIANCE

iStar Jewelry LLC DBA Stanley Creations expects its Company and all its suppliers to comply with their national laws and regulations and to respect the fundamental International Labour Organization (ILO) conventions and the Universal Declaration of Human Rights. Where the Code or national law addresses the same issue, the supplier is expected, as a minimum, to be in compliance with the applicable legal requirements of the country in which it operates.

KEEPING OF RECORDS

Business partners should keep proper records and follow accounting policies. All company's books, invoices, records, accounts must be created and maintained, and should be fair, accurate and in reasonable detailed to reflect the substance of transaction and disposition of the business. All relevant expenses should be properly approved and contained in the financial records.

SAFE QUALITY PRODUCTS

Stanley Creations takes special care to ensure that the merchandise we purchase and sell to our customers meets the highest quality and safety standards. But we cannot meet those goals alone, we rely on suppliers and business partners to fulfill high standards by executing the following:

- Comply with all applicable safety laws and regulations, including application state requirements
- Comply with applicable quality standards

- Implement and maintain processes and procedures to monitor and tests the safety and quality compliance of raw materials, components, and final products sold to Stanley Creations
- Maintain accurate books and records related to product safety and quality compliance.

PREVENTION OF BRIBERY

Business partners committed to abiding by all relevant laws, including but not limited to, the US Foreign Corrupt Practices Act, in order to prevent bribery whenever undertakes business. This applies to:

- Relevant Persons not accepting bribes: That is they should not solicit any advantage from any person having business dealings with the Company. Nor should they accept any such advantage if such act could affect their objectivity in conducting Company's business or induce them, to act against the interest of the Company, or lead to allegations of impropriety. Further they should ensure that the appropriate managers in the Company are informed of any advantage they have accepted.
- Relevant Persons not giving bribes: They must not offer a bribe to any person or company with the intention of influencing their actions. Any advantage given in the conduct of the Company's business should be with the prior written approval of the head of respective business unit.

Items considered bribes are advantages which include money, loans, fees, rewards, gifts, employment, offices, contracts, services, or other benefits for the relevant persons or connected persons given to persons without their principals' knowledge when they are acting as agents. There is no restriction on normal loans from banks or other financial institutions made at prevailing rates and terms, nor does bribery include traditional gifts of nominal value given during festive seasons. Although entertainment is an acceptable form of business and social behavior, relevant persons should not accept lavish or frequent entertainment from persons with whom the Company has business dealings if, by doing so, it might be perceived that they are placing themselves in a position of obligation to the offeror. When giving entertainment, company functions are preferable to entertaining individuals. Relevant persons should exercise good judgment and try to control in giving and receiving business gifts and entertainment. This should not be given in cash, cash equivalent, or loans; they should not be excessive in frequency or value.

ANTI-MONEY LAUNDERING

A set of procedures, laws or regulations designed to stop the practice of generating income through illegal actions. In most cases money launderers hide their actions through a series of steps that make it look like money coming from illegal or unethical sources was earned legitimately. Business partners must verify the identity of counterparties on their screened to ensure its legitimacy. This may require to access to basic background information, particularly regarding the reason the customer's business, source of income, the expected level of activity, as well as the reason of activities.

SOCIALLY RESPONSIBLE SUPPLY CHAIN

(a) Ethical sourcing

1. We in all aspects of business operations are to comply with the highest ethical standards. We should take the following measures:
 - i. Gold and metals committed to ensuring compliance with the most stringent from human rights, social and environmental criteria suppliers. •

- ii. Establish close relationships with suppliers
- iii. Research on gold mining, refining and manufacturing processes
- iv. Observe the highest priority to environmental management standards from the mine purchase gold suppliers.
- v. Cooperation with suppliers, to enhance purchases gold from recycled and secondary sources.
- vi. Measures and benchmarking in order to improve day by day.

LABOR AND REMUNERATION

Business Partners committed to uphold the human rights of employees, and respect as understood by the international community. The labor standards are:

(a) Freely Chosen Employment

1. Forced, bonded or indentured labor or involuntary prison labor is not to be used. All work will be voluntary, and employees are free to leave upon reasonable notice. Employees shall not be required to hand over government-issued identification, passports or work permits as a condition of employment.
2. Forced labor should also be defined to include any work or service which is extracted from any person under the threat of penalty for its non-performance and for which the worker does not offer himself or herself voluntary. Forced labor of any form is not permitted at our Company.

(b) Child Labor Avoidance

1. Child labor is not to be used in company. The term “child” refers to any person employed under the age of 15, or under the age of completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace apprenticeship programs, which comply with all laws and regulations, is supported. Employees under the age of 18 should not perform hazardous work restricted with consideration given to educational needs.

(c) Non-Discrimination

1. We should commit to a workforce free of harassment and unlawful discrimination. Companies shall not engage in discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership or marital status in hiring and employment practices such as promotions, rewards, and access to training. In addition, employees or potential employees should not be subjected to medical/pregnancy tests that could be used in a discriminatory way.

(d) Humane Treatment and Harassment/Abuse

1. There is to be no harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, physical or mental coercion or verbal abuse of employees; nor is there to be a threat of any such treatment.
2. Workplace to be free from harassment of any form – including but not limited to: use of monetary fines, corporal punishment, mental abuse, physical abuse, intimidation, coercion, etc.

(e) Wages and Benefits

1. Wages paid to employees shall comply with all applicable wage laws, including those relating minimum wages, overtime hours and legally mandated benefits. Any disciplinary wage deductions are to conform to local law. The basis on which employees are being paid is to be clearly conveyed to them in a timely manner.

(f) Working Hours

1. Employees exhibiting weary labor leads to reduction of productivity, increased injury, and illness. Weekly working hours are not to exceed the limit set by local law.

(g) Freedom of Association

1. Open communication and direct engagement between employees and management are the most effective ways to resolve workplace and compensation issues. Our Company respects the rights of employees to associate freely, join labor unions, seek representation, and join employees' councils in accordance with local laws. Employees shall be able to communicate openly with management regarding working conditions without fear of reprisal, intimidation, or harassment.

CREATING AND MAINTAINING HEALTH AND SAFETY WORKING CONDITIONS

Business Partners recognize that a safe and healthy work environment enhance the quality of products and services, consistency of production and employees' morale. The health and safety standards are:

(a) Occupational Safety

1. Employee exposure to workplace safety hazards (e.g., electrical and other energy sources, fire, vehicles, slips, trips, and fall hazardous) is to be controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tag out). Where hazards cannot be adequately controlled by these methods, employees are to be provided with appropriate personal protective equipment.
2. Workers' eyesight is protected by ensuring the availability and use of appropriate magnifying tools when working on jewelry, diamonds, and gemstones, by but not limited to, providing the appropriate lighting, ergonomic working environment, and prevention of repetitive strain.
3. Facilities have adequate ventilation from harmful fumes or dust.
4. Appropriate protective clothing is provided and use of protective clothing is ensured.
5. Residential facilities are kept safe and healthy in accordance with local laws and regulations.
6. Facilities have easily accessible, adequate, and clean restrooms for employee use.
7. Potable water should be available always.

(b) Emergency procedures and evacuation plans

1. Emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures, including: emergency reporting, employee notification and evacuation procedures, training and drills, appropriate fire detection equipment monitor, adequate exit facilities and recovery plans.
2. Appropriate firefighting equipment is available and easily accessible, in conjunction with clearly marked open fire exits in case of emergency.

(c) Physical Labor

1. Employee exposure to physically demanding tasks, including manual material handling and heavy lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated, and controlled.

ENVIRONMENTAL

Business partners must comply with local environmental laws and practices, including, but not limited to, laws and practices on waste disposal [proper disposal of toxic and hazardous waste, segregation (if specified), etc.], air emissions, pollution, and emissions.

(a) Chemical and Hazardous Materials

1. Chemical and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, recycling or reuse and disposal.

(b) Wastewater and Solid Waste

1. Wastewater and solid waste generated from operations, industrial processes and hygiene facilities are to be monitored, controlled, and treated as required prior to discharge and disposal.

(c) Pollution Prevention and Resource Reduction

1. All types of waste, including water and energy, should be reduced or eliminated from the source or practices, such as modifying production, maintenance, production processes, material substitution, conservation, recycling and reuse of materials.
2. Whenever feasible, promote and support initiatives to promote greater environmental responsibility along the entire jewelry supply chain while complying with relevant locally applicable environmental law and regulation.

COMPLIANCE WITH SUPPLIER PRINCIPLES

All concerned parties must follow these Principles for Social Responsibility and to take the required measures to ensure that these Principles are often being followed. If necessary, relevant person is required to issue policies, guidelines, and regulations to implement and supplement the content of these Principles.

Company institutes a self-monitoring system based on these Principles and strives towards independent verification of compliance. Company encourages its employees, business partners, contractors, and suppliers, to ensure provisions of these Principles are adopted and applied as comprehensively as possible.

Relevant person should not use agents, partners, contractors, family members or representatives trying to avoid fulfilling these provisions.

In unknown, please ask our compliance officer at iStar Jewelry LLC dba Stanley Creations. Otherwise, a violation cannot be content with unknown as an excuse to evade the relevant responsibilities.

Current Compliant Officer: Wayne Cheng