



SUPPLY CHAIN POLICY

*Updated: August 14, 2024

1. The company is a manufacturer and a wholesaler. This policy confirms the Company's commitment to respect human rights, avoid contributing to the financing of conflict, and comply with all relevant UN sanctions, resolutions, and laws.
2. The company is a certified Responsible Jewellery Council (RJC) member. As such, we commit to proving, through independent third-party verification, that we:
 - a. respect human rights according to the Universal Declaration of Human Rights and International Labor Organization Fundamental Rights at Work.
 - b. do not engage in or tolerate bribery, corruption, money laundering, or finance of terrorism.
 - c. support transparency of government payments and rights-compatible security forces in the extractives industry.
 - d. do not provide direct or indirect support to illegal armed groups; and
 - e. enable stakeholders to voice concerns about the jewelry supply chain.
 - f. are implementing the OECD 5-Step framework as a management process for risk-based due diligence in responsible supply chains of minerals from conflict-affected and high-risk areas.
3. We also commit to using our influence to prevent abuses by others.
4. Regarding serious abuses associated with the extraction, transport, or trade of diamonds/colored gemstones: We will neither tolerate nor profit from, contribute to, assist, or facilitate the commission of:
 - a. torture, cruel, inhuman, and degrading treatment.
 - b. forced or compulsory labor.
 - c. the worst forms of child labor.
 - d. human rights violations and abuses; or
 - e., war crimes, violations of international humanitarian law, crimes against humanity, or genocide.

f. The company has stopped all trade in precious metals and diamonds that originate from Russian sources.

5. We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are committing abuses described in paragraph 4 or are sourcing from, or linked to, any party committing these abuses.

6. Regarding direct or indirect support to non-state armed groups: We only sell or purchase diamonds/colored gemstones that are fully compliant with the Kimberley Process Certification Scheme and, as such, will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring diamonds/colored gemstones from, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates who illegally:

a. control mine sites, transportation routes, points where diamonds/colored gemstones are traded, and upstream actors in the supply chain; or

b. tax or extort money or diamonds/colored gemstones at mine sites, along transportation routes, or at points where diamonds/colored gemstones are traded, or from intermediaries, export companies, or international traders.

7. We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are sourcing from or linked to any party providing direct or indirect support to non-state armed groups, as described in paragraph 6.

8. Regarding public or private security forces: We affirm that the role of public or private security forces is to provide security to workers, facilities, equipment, and property in accordance with the rule of law, including law that guarantees human rights. We will not provide direct or indirect support to public or private security forces that commit abuses described in paragraph 4 or that act illegally as described in paragraph 6.

9. Regarding bribery and fraudulent misrepresentation of the origin of diamonds/colored gemstones: We will not offer, promise, give, or demand bribes and will resist the solicitation of bribes, to conceal or disguise the origin of diamonds/colored gemstones, or to misrepresent taxes, fees, and royalties paid to governments for the purposes of extraction, trade, handling, transport, and export of diamonds.

10. Regarding money laundering: We will support and contribute to efforts to eliminate money laundering where we identify a reasonable risk resulting from, or connected to, the extraction, trade; handling, transport, or export of diamonds/colored gemstones.

11. Regarding selling or purchasing diamonds, we are fully committed to comply with:

- a. the Kimberley Process Certification Scheme (KPCS) and the US "Clean Diamond Trade Act" (CDTA) - which implemented KPCS to regulate the commercial sale of diamonds.
- b. the World Diamond Council (WDC) System of Warranties (SoW), which requires a written warranty statement on all invoices related to consignments of diamonds, whether rough, polished, or set in Jewelry. In our invoices, we use the official WDC warranty statement:

"The diamonds herein invoiced have been purchased from legitimate sources not involved in funding conflict and in compliance with United Nations resolutions. The seller hereby guarantees that these diamonds are conflict-free, based on personal knowledge and/or written guarantees provided by the supplier of these diamonds."

12. We also commit to do a detailed and full Due Diligence process for each of our counterparties, which involves:

- a. verifying its identity and address.
- b. doing an ongoing effort to identify risks regarding:
 - (i) Money laundering & finance of terrorism (in accordance with RJC's COP 12)
 - (ii) Bribery (in accordance with RJC's COP 11)
 - (iii) Conflict Affected and High-Risk Area (CAHRA)
- c. having periodical risk assessments which involves the nature, severity and probability of each risk and where required (e.g., where any unusual or suspicious activity is identified):
 - (i) having a systematic risk mitigation process
 - (ii) reporting to the appropriate authorities

13. Regarding metal, we buy our Gold, Silver, and Platinum from a companies certified by LBMA (London Bullion Market Association).

14. The company has established this grievance procedure to hear concerns about circumstances in the supply chain involving diamonds and colored gemstones from conflict-affected and high-risk areas.

Yours Sincerely,

Sako Baderian

Senior manager of Policy implementation

