

BRIGITTE ERMEL

JOAILLIER

Responsible Supply Chain Policy

1. BRIGITTE ERMEL JOAILLIER is involved in High Jewellery design and manufacturing. This policy, signed by the CEO, affirms BRIGITTE ERMEL JOAILLIER's commitment to respect human rights, avoid contributing to the financing of conflicts, and comply with all applicable laws, regulations and national and international conventions, and relevant UN sanctions, resolutions, and laws.
2. BRIGITTE ERMEL JOAILLIER is a certified member of the RESPONSIBLE JEWELLERY COUNCIL (RJC). 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 to the International Labor Organization's Declaration on Fundamental Principles and Rights at Work;
 - b. do not engage in or tolerate bribery, corruption, money laundering or financing 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;
 - e. enable stakeholders to voice concerns about the Jewellery supply chain;

We are also implementing the 5-Step framework of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

3. We commit to using our influence to prevent abuses by others. We inform our partners, customers, and suppliers, and ask them to respect certain commitments.

We also establish a procedure to receive and address complaints from partners and whistleblowers, which can be activated by:

- sending a mail for the attention of BRIGITTE ERMEL, CEO of the company, at 191, rue Saint-Honoré, 75001, Paris, France;
 - or sending an email to b.ermel@brigitte-ermel.com.
4. Regarding serious abuses associated with the extraction, transport, or trade of precious metals, diamonds, and coloured 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 labour;
 - c. the worst forms of child labour;

191, rue Saint-Honoré - 75001 Paris

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- d. human rights violations and abuses;
 - e. war crimes, violations of international humanitarian law, crimes against humanity, or genocide.
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:
- recycled precious metals that are compliant with the RJC CoC Standard;
 - diamonds that are fully compliant with the Kimberly Process Certification Scheme;
 - non-treated coloured gemstones which sourcing is aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

As such, we will not engage in or tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring precious metals, diamonds, or coloured 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 precious metals, diamonds, or gemstones are traded and upstream actors in the supply chain;
 - b. tax or extort money, precious metals, diamonds, or coloured gemstones at mine sites, along transportation routes, or at points where precious metals, diamonds, and coloured 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 are linked to, any party providing direct or indirect support to non-state armed group 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 as described in Paragraph 4 or that act illegally as described in Paragraph 6.

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9. Regarding Bribery and fraudulent misrepresentation of the origin of precious metals, diamonds, and coloured gemstones:

We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of precious metals, diamonds, or coloured gemstones, or to misrepresent taxes, fees, and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of precious metals, diamonds, or coloured gemstones.

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 precious metals, diamonds, and coloured gemstones.



Brigitte Ermel

Founder and CEO

29/04/2022

Effective date of the policy

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