### **Responsible Sourcing Policy**

- 1. BRIGITTE ERMEL JOAILLIER is a company specializing in the creation and manufacturing of High Jewelry. This policy confirms BRIGITTE ERMEL JOAILLIER's commitment to respecting human rights, avoiding contributing to conflict financing, and respecting all relevant United Nations sanctions, resolutions, and law. BRIGITTE ERMEL JOAILLIER also affirms herein its commitments regarding ethical, social, and environmental responsibility.
- 2. <u>BRIGITTE ERMEL JOAILLIER is a certified member of the Responsible Jewellery Council (RJC).</u> As such, we commit to proving, through verification by an independent third party, that:
  - We respect human rights under the Universal Declaration of Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work, including applicable legislation regarding disciplinary procedures. We reject and firmly condemn child labor, forced labor, hidden or clandestine work, as well as human trafficking, and any form of discrimination, harassment, or violence at work. We will cease any relationship with the concerned party in case of violation of these provisions, until risk control is achieved:
  - We do not participate in any form of corruption, money laundering, or terrorism financing and do not tolerate such activities;
  - We support transparency of payments from governments and rights-compliant security forces in extractive industries;
  - We have a Security & Safety policy giving high priority in the company to:
    - o Providing decent and appropriate hygiene and safety conditions in the workplace.
    - Employing personnel in strict compliance with Labor Law: working hours, employment conditions, general hiring conditions, workplace hygiene and safety, applicable legislation regarding disciplinary procedures within the framework of provisions defined by French regulations and the International Labour Organization.
    - Prioritizing the safety of people over that of property.

- We provide no direct or indirect support to illegal armed groups;
- We enable stakeholders to express their concerns regarding the jewelry supply chain:
- We implement the OECD five-step framework as a management process to conduct risk-based due diligence to ensure responsible supply chains for minerals from conflict-affected and high-risk areas;
- We commit to respecting and promoting respect for the Kimberley Process procedure regarding the purchase and sale of diamonds;
- We adopt environmentally responsible attitudes and practices to control our environmental impact. An environmental policy has been implemented and displayed in our premises;
- 3. We also commit to using our influence to avoid potential violations by other parties:
  - We will immediately suspend or cease any relationship with suppliers when we identify a reasonable risk that they are sourcing from or are linked to third parties committing serious violations, as defined above;
  - We enable stakeholders to express anonymously and without fear of retaliation their concerns regarding potential workplace mistreatment, human rights violations, as well as corruption facts, or those related to the jewelry supply chain;
  - We make available to stakeholders a complaint handling mechanism that can be activated at any time:
    - By addressing a letter to BRIGITTE ERMEL, CEO, 191 rue Saint-Honoré, 75001
      PARIS
    - o By sending an email to <u>b.ermel@brigitte-ermel.com</u>
- 4. Regarding flagrant violations during the extraction, transport, or trade of diamonds/colored stones: we will not tolerate, assist, or facilitate in any way the perpetration of the following acts, nor will we profit from or contribute to them:
  - torture or cruel, inhuman, and degrading treatment;
  - forced or compulsory labor;
  - the worst forms of child labor;
  - violations and infringements of human rights;
  - war crimes, violations of international humanitarian law, crimes against humanity, or genocide;

#### JOAILLIER

- 5. We will cease any relationship with upstream suppliers if we identify a risk reasonably indicating that they engage in the violations mentioned in paragraph 4, that they source from third parties committing these violations, or that they are associated with them.
- 6. Regarding direct or indirect support to non-state armed groups: we only sell or purchase diamonds/colored stones fully compliant with the Kimberley Process Certification Scheme and, as such, will not tolerate any direct or indirect support to non-state armed groups or their affiliated entities including through sourcing diamonds/colored stones, money transfers, or providing logistical, material, or other assistance illegally engaging in the following activities:
  - Illegal control of mining sites or transport routes, diamond/colored stone trading points, and upstream actors in the supply chain;
  - Illegal taxation or extortion of money or diamonds/colored stones at mining sites, transport routes, or diamond/colored stone trading points, or against intermediaries, exporting companies, or international traders;
- 7. We will immediately cease any relationship with upstream suppliers if we identify a reasonable risk that they source from third parties directly or indirectly supporting non-state armed groups such as those referred to in paragraph 6 or are linked to them.
- 8. Regarding public or private security forces: we affirm that the role of public or private security forces is to ensure the security of workers, facilities, equipment, and property in accordance with the rule of law, including legislation that guarantees human rights. We will provide no direct or indirect support to public or private security forces that commit the violations described in paragraph 4 or that act illegally as described in paragraph 6.
- 9. Regarding bribes and false declarations about the origin of diamonds/colored stones: we refrain from offering, promising, or granting bribes and we resist bribe solicitations for the purpose of hiding or concealing the origin of diamonds/colored stones, making false declarations concerning taxes, duties, and royalties paid to governments for the extraction, trade, processing, transport, and export of diamonds.

10. <u>Regarding money laundering</u>: we will support efforts to contribute to the elimination of money laundering in situations where we identify a reasonable risk of money laundering resulting from or linked to the extraction, trade, processing, transport, or export of diamonds/colored stones.

Paris, April 16, 2025 Brigitte ERMEL Founder & CEO

BRIGITTE ERMEL JOAILLIER

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