

## ANNUAL INTERNAL REVIEW OF GROSPIRON SARL

As part of our RJC certification, we carry out an annual internal review of our management system, an extract of which is given below:

- Our supply chain policy: It has been sent to our stakeholders and shared to our employees.
- RJC referent: An RJC referent has been set up within our company.
- Environment:
  - Obsolete files are regularly deleted in order to reduce storage volume on IT servers and our carbon footprint.
  - More responsible consumption of cleaning products: use of the Cleanea brand, which manufactures ecological and environmentally-friendly cleaning products.
  - Recycling or reusing packaging and boxes received from customers and suppliers.
- Due Diligence: every year we carry out due diligence on our stakeholders in accordance with the OECD's five-step framework for risk-based due diligence on the supply chain of minerals from conflict or high-risk areas. In particular, we question our suppliers in order to obtain the most reasonable assurance, depending on their type, that they are not themselves sourcing the materials they deliver to us from conflict-related sources.

The highlights we have identified for this year are as follows:

- We have been particularly vigilant with our diamond suppliers, following the international sanctions concerning Russia.
- We have identified that some of our gemstone suppliers source from high-risk CAHRAS countries. Some suppliers are certified to the RJC's COP 2019 standard. We questioned them, and they told us that they carry out due diligence in accordance with the OECD's 5-step guide, which enables them to take account of and limit CAHRAS risks.
- KYC = Knowledge of our counterpart. Our company has a KYC policy in place. We review it every year to ensure that it is as relevant as possible and consistent with changes in our environment. We have strengthened our monitoring of government surveillance sites, listing individuals or companies involved in money laundering and fraud or participating in illegal organizations and/or financing conflicts.
- Human rights: We carry out human rights due diligence within our company and for the stakeholders with whom we are involved. We review this process annually. To date, no alerts have been identified.
- Grievance mechanism: a grievance mechanism is available within our Company, and we allow stakeholders to raise concerns anonymously and without fear of reprisal about possible mistreatment in the workplace, human rights abuses, corruption, or relating to the jewellery supply chain. To this end, we have set up a grievance mechanism, which can be obtained from the following address: [xavier@grospiron.fr](mailto:xavier@grospiron.fr)

- The Company's latest RJC COP certification dates from 14/04/2021.
- Review of the system: The system is reviewed every year, and a communication is carried out to inform stakeholders of any significant points that the internal review may have highlighted.

Paris, 1st December 2023

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A handwritten signature in black ink, consisting of a stylized 'G' followed by a vertical line and a horizontal stroke at the bottom.