

This policy confirms **ETABLISSEMENTS GROSPIRON Company's commitment** to respect human rights, not to contribute to the financing of conflicts and to comply with all applicable United Nations sanctions, resolutions and laws. It also affirms its commitments to ethical, social and environmental responsibility.

ETABLISSEMENTS GROSPIRON is a member of the Responsible Jewellery Council (RJC). As such, we are committed to demonstrating, through independent third-party verification, that we:

- a. Respect human rights in accordance with the United Nations Guiding Principles and the International Labour Organization Declaration on Fundamental Principles and Rights at Work, including applicable legislation on disciplinary procedures. In particular, we reject and strongly condemn child labour, forced labour, undeclared or clandestine work, as well as human trafficking, and any form of discrimination, harassment or violence at work. We will cease all relations with the party concerned in the event of a violation of these provisions, until the risk is controlled.
- b. Do not participate in any form of money laundering or terrorist financing and do not tolerate such activities.
- c. Support transparency of payments from rights-compliant governments and security forces in extractive industries.
- d. Security policy – Safety: high priority is given to these themes in the Company:
 - Providing decent and suitable hygiene and safety conditions in the workplace
 - The employment of staff in strict compliance with labor law: working hours, employment conditions, general hiring conditions, hygiene and safety in the workplace, applicable legislation regarding disciplinary procedures within the framework of the provisions defined by French regulations and the International Labor Organization.
 - Prioritizing the safety of people over that of property
- e. We strongly reject and condemn any form or attempt at corruption and facilitation payments in whatever form they may take : we are committed to supporting employees who may be confronted with any attempt at corruption.
- f. Allow stakeholders to express anonymously and without fear of reprisal their concerns regarding possible mistreatment at work, human rights violations, as well as corruption, or relating to the supply chain of the jewelry sector. To do this, we have set up and make available to the parties concerned a complaint handling mechanism, which can be obtained upon simple request at the following address: **xavier@grospiron.fr**
- g. Implement the OECD five-step framework for risk-based due diligence in the supply chain of minerals from conflict-affected and high risk areas.
- h. We also undertake to use our influence to prevent possible abuse by other parties.
- i. We undertake to respect and promote compliance with the KIMBERLEY PROCESS procedure concerning the purchase and sale of diamonds.
- j. Let us adopt an ecologically responsible attitude and practices in order to control our impact on the environment. An environmental policy has been put in place and displayed on our premises

➤ **Concerning serious damage during the extraction, transport or trade of minerals:**

We will not in any way tolerate, assist, facilitate, benefit from, or contribute to the commission of any of the following acts:

- torture or cruel, inhuman or degrading treatment;
- forced or compulsory labour ;
- the worst forms of child labour ;
- human rights violations and abuses ;
- crimes, or other flagrant violations of international humanitarian law, crimes against humanity or genocide.

We will terminate any relationship with upstream suppliers if we identify a risk that reasonably indicates that they are engaging in the abuses referred to above, sourcing from, or are associated with third parties committing these serious violations.

➤ **Regarding direct or indirect support for non-state armed groups:**

We will not tolerate any direct or indirect support for non-state armed groups or their affiliates — including through the supply of gold, diamonds or precious stones, the payment of money or the provision of logistical, material or other assistance — illegally engaging in the following activities:

a. Illegal control of mining sites or transport routes, mineral trading points and upstream actors in the supply chain.

b. Illegal taxation or extortion of money, gold, diamonds or precious stones at mining sites, transport routes or trading points for gold, silver and precious metals from the Platinum, diamond or precious stone mine, or against intermediaries, export companies or international traders.

We will immediately cease all relationships with upstream suppliers if we identify a reasonable risk that they are sourcing from third parties that directly or indirectly support or are linked to non-state armed groups such as those referred to above.

➤ **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 not provide any direct or indirect support to public or private security forces that commit the abuses described or that act unlawfully as described in the paragraphs above.

➤ **Regarding corruption and false declarations about the origin of gold, silver, precious metals from the Platinum mine, diamonds and precious stones:**

We will refrain from offering, promising or giving bribes and will resist solicitations of bribes for the purpose of concealing or disguising the origin of gold, silver, platinum-mined precious metals, diamonds and gemstones; and make false statements regarding taxes, duties and royalties paid to governments for the mining, trading, processing, transportation and export of gold, silver, platinum-mined precious metals, diamonds and gemstones.

➤ **Regarding money laundering:**

We will support efforts to contribute to the elimination of money laundering in situations where we identify a reasonable risk of money laundering arising from or related to the mining, trading, processing, transportation or export of gold, silver, platinum precious metals, and diamonds and precious stones.

Paris, July 28, 2025

ETABLISSEMENTS GROSPIRON

A handwritten signature in black ink, consisting of a stylized 'M' or 'G' shape with a horizontal line extending to the left.