GROSPIRON

INTERNAL ANNUAL REVIEW

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

- Supply chain policy: this has been communicated to our stakeholders.
- RJC Representative: an RJC representative has been appointed within our Company.
- **Due Diligence**: each year we carry out Due Diligence with our Stakeholders in accordance with the OECD's five-step framework for risk-based due diligence related to the supply chain of minerals from conflict-affected or high-risk areas. We specifically question our suppliers to obtain the most reasonable assurance, based on their profile, that they themselves do not source the materials they supply us with from conflict-affected sources.
- A remediation process has been implemented to address the findings of any Due Diligence that does not meet
 expectations with the concerned stakeholder. As such, our due diligence management plan includes a flowchart
 that allows us to respond to identified risks.

Key highlights identified this year include:

- We have been particularly vigilant with our diamond suppliers, following international sanctions concerning Russia.
- We have identified that some of our coloured gemstone suppliers source from high-risk CAHRAS countries. These
 suppliers are all certified under the RJC COP 2019 standard. We questioned them, and they informed us that they
 conduct Due Diligence in line with the OECD's five-step guidance, enabling them to consider and limit CAHRAS risks.

KYC = Know Your Counterparties.

- A KYC policy is in place within our Company. We review it annually to ensure its relevance and that it aligns with changes in our environment. We have reinforced our monitoring of government watchlists that identify individuals or companies involved in money laundering, fraud, or that are linked to illicit organisations and/or conflict financing.

Human Rights:

- we conduct human rights due diligence within our Company and with the Stakeholders with whom we are engaged. This process is reviewed annually. To date, no alerts have been identified.

Grievance Mechanism:

- a grievance mechanism is available within our Company, allowing stakeholders to anonymously and without fear of retaliation raise concerns about potential workplace misconduct, human rights violations, acts of corruption, or issues related to the jewellery supply chain. To this end, a complaint mechanism is in place and made available to the relevant parties, and can be accessed at the following address: xavier@grospiron.fr
- The Company's last RJC COP certification was dated 14 juin 2024.
- **System Review**: the system is reviewed each year, and communication is made to inform stakeholders of any significant points identified during the internal review.

Paris, le 28 juillet 2025

ETABLISSEMENTS GROSPIRON et/ou cachet de la société Votre signature ici