



AGD Trading SA

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Policy on the supply chain of diamonds and colored gemstones

1. This policy confirms AGD TRADING's commitment to respecting human rights, avoiding any contribution to the financing of conflicts, and complying with all relevant United Nations sanctions, resolutions and applicable laws.

2. AGD TRADING is a certified member of the Responsible Jewellery Council (RJC). As such, we commit to demonstrating, through independent third-party verification, that we:

a) Respect human rights in accordance with the Universal Declaration of Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work;

b) Do not engage in, tolerate, or support any form of corruption, money laundering, or terrorist financing;

c) Support transparency regarding payments made to governments and security forces in the extractive industries;

d) Do not provide direct or indirect support to illegal armed groups;

e) Enable stakeholders to raise concerns regarding the jewellery supply chain; and

f) Implement the OECD five-step framework as a management process to conduct risk-based due diligence for responsible supply chains of minerals originating from conflict-affected and high-risk areas. For any complaints or claims related to impacts arising from AGD TRADING's activities, stakeholders may contact the company so that such matters may be addressed appropriately. The annual due diligence report is available upon request.

3. We also commit to using our influence to prevent potential violations by other parties. We maintain a grievance management process related to COP 02, allowing complaints to be submitted to the company. In addition, in the event of supplier non-compliance, explanations and corrective measures will systematically be requested.

4. Regarding serious abuses associated with the extraction, transport or trade of minerals:

We will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission of the following acts:

- a. torture or cruel, inhuman and degrading treatment;
- b. forced or compulsory labour;
- c. the worst forms of child labour;
- d. human rights violations and abuses; or
- e. war crimes, other serious violations of international humanitarian law, crimes against humanity or genocide.

5. We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are committing abuses described in paragraph 4, sourcing from or linked to parties committing such abuses.

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6. Regarding direct or indirect support to non-state armed groups:

We only buy and sell diamonds and coloured gemstones that are fully compliant with the Kimberley Process Certification Scheme and, as such, we do not tolerate any direct or indirect support to non-state armed groups or their affiliates through the sourcing of diamonds and coloured gemstones, the payment of money, or the provision of logistical, material or other assistance.

This includes groups that illegally:

a. control mine sites, transportation routes, points where diamonds and coloured gemstones are traded, or upstream actors in the supply chain; or

b. illegally tax or extort money or diamonds and coloured gemstones at mine sites, transportation routes or trading points, or from intermediaries, exporting companies or international traders.

7. We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, parties providing direct or indirect support to non-state armed groups as described in paragraph 6.

8. Regarding public or private security forces:

We recognise 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 laws guaranteeing human rights. We will not provide direct or indirect support to public or private security forces that commit the abuses described in paragraph 4 or that act illegally as described in paragraph 6.

9. Regarding bribery and fraudulent misrepresentation of the origin of minerals:

We prohibit the offering, promising or giving of bribes and will resist the solicitation of bribes intended to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the extraction, trade, processing, transport and export of minerals.

10. Regarding money laundering:

We support efforts aimed at preventing and eliminating money laundering where we identify a reasonable risk of money laundering resulting from or connected to the extraction, trade, processing, transport or export of minerals.

AGD TRADING applies a responsible business policy.

Any complaint or concern regarding anti-money laundering or anti-bribery policies may be submitted anonymously and confidentially.

For any information requests, complaints, or if you wish to obtain our due diligence reports relating to the supply chain or human rights, you may contact us without risk of retaliation by email at: agd@agd-trading.com or by telephone at: +41 22 512 60 10.