

**PRODUCT DISCLOSURE,  
DUE DILIGENCE REPORTING &  
CARE RECOMMENDATIONS**

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## GÜBELIN JEWELLERY'S CORE VALUES

Gübelin Jewellery believes that true luxury lies in uniting our core values: **authenticity, expertise and inspiration.**

This Product Disclosure Policy is inspired by our core values and reflects our Commitment to Ethical & Responsible Business Practices.

Its goal is to provide further transparency about how we do business, share our knowledge and passion for gemstones and precious metals while deepening the connection to our consumers and business partners with our creations. For more information about our **Journey to Transparency** and our **Commitment to Ethical Sourcing**, please visit [www.gubelin.com](http://www.gubelin.com).



## PRODUCT DISCLOSURE

### Deeply Inspired

Product Disclosure is fundamental to Gübelin Jewellery’s connection with our customers and intrinsic to our ‘Deeply Inspired’ philosophy while encompassing our core values of authenticity, expertise and inspiration. We want our customers to understand and know as much as possible about what the investments they make with us.

**Authenticity** is defined as transparency within our responsible business policy and our products. Gübelin Jewellery uses high quality gemstones and precious metals – truly authentic. Building trust with our customers, our business partners and within our organisation through the integrity of our creations, and their components, is central to the prestige, notoriety and success that we have achieved since the founding of the House of Gübelin in 1854. The essence of Product Disclosure is authenticity.

We define **expertise** as depth of knowledge of our metier; empowering our customers and business partners through: education, technology and innovation. We aim to cultivate a global community of gemstone enthusiasts through sharing our knowledge. It is inherent within our ‘Deeply Inspired’ philosophy and the Gübelin legacy, to share our passion and extensive know-how of gemstones and unique jewellery creations.

Connection to the world and each other is the source of Gübelin Jewellery’s **inspiration** in our creations; through our designs, we aim to inspire our consumers and our business partners. Connection to the world and each other requires transparency, driving Gübelin Jewellery to improve our ethical business practices and to intensify our commitment to **responsible sourcing**. We know that this approach deepens engagement with our brand and our legacy. In our continuous efforts to make positive impacts in ethical business practices, we aim to inspire the industry, our employees and our customers.



## Provenance Proof

We believe there is a necessity for our industry to embrace transparency and traceability. The Provenance Proof initiative was established in 2017 by the House of Gübelin and acts as an independent entity. Provenance Proof is the umbrella brand for a bundle of truly innovative, cutting-edge technologies with the aim of offering more transparency. The purpose is to provide traceability to the entire gemstone and jewellery industry supporting sustainability efforts and simplifying supply chain risk management through digital and physical tracking solutions. The Emerald Paternity Test, which uses nanolabels to trace emeralds back to the exact mine of origin, and the Provenance Proof Blockchain, the first digital ledger for coloured gemstones, as well as the Proof of Donation, a service based on non-fungible tokens (NFT) to enhance transparency and trust in charity programmes, make up part of the Provenance Proof initiative. These technologies and services are designed and available for every stakeholder in the industry who embraces transparency, from miners to end consumers.

We believe that technology will enable greater trust, understanding and connections between people. By sharing information transparently, we believe we can be part of transforming the industry, improving relationships, and instilling greater fairness throughout the value chain.



### *Dancing Dunes*

*The Dancing Dunes necklace is constructed using 100% recycled gold, validated by supplier statements, warranties and which have RJC (Responsible Jewellery Council) certified provenance claims. All of the emeralds and the Gübelin Jewellery iconic ruby in the Dancing Dunes necklace can be traced back to the mine of origin by the Provenance Proof Blockchain, including: certificates of provenance, Gübelin Gemmological Reports and/or the Emerald Paternity Test. This exquisite jewellery creation illustrates supply chain transparency and the systems supporting it.*

## Definition of Product Disclosure

**Product Disclosure** is defined as the act of providing all material information to fully inform a purchaser prior to or during a final sale<sup>1</sup>.

Gübelin Jewellery defines **product disclosure** as the complete and accurate disclosure of all relevant information about our jewellery creations, aimed to fully inform our customers.

**Product Disclosure** is transparency about the nature and quality of our products.

Gübelin Jewellery ensures that the precious metals or gem materials and products throughout our supply chain are correctly and accurately represented and disclosed in accordance with Swiss Law and recognized industry practices.



<sup>1</sup> CIBJO Blue Book Gemstone Guidelines in Normative Clauses, p. 22 and 24

## GÜBELIN JEWELLERY'S PRECIOUS METALS

Gübelin Jewellery uses exclusively precious metals, specifically, gold and platinum alloys<sup>2</sup>, in all jewellery creations and we apply marks of authenticity to all of our pieces in accordance with Swiss Law.

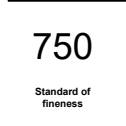
### Precious Metals Descriptions

As a standard, we use gold alloy with a fineness standard of 750 and platinum alloy standard of 950 in our jewellery creations. Gübelin Jewellery engraves each of its pieces with a standard of **fineness mark (750 or 950)** and a **responsibility mark** as seen below in accordance with Swiss Law.

The fineness is the content of the named precious metals measured in terms of parts per thousand by weight of alloy<sup>3</sup>. Gübelin Jewellery adheres to Swiss Law for Measurement of Fineness.

The **responsibility mark** is a symbol which in itself identifies the owner of the mark.

#### Fineness Mark



#### Responsibility Mark



Gübelin Jewellery does not use any metal coating/plating of non-precious metals or imitations or synthetics of any kind in its products.

At Gübelin Jewellery we protect our consumers' health and well-being with safely manufactured designs and follow all guidelines, international regulations and Swiss Law.

Nickel is used for specific parts in our creations only. Although these small parts do come into contact with skin, the amount of nickel used is far less than what is legally permitted.

### Quality Testing

The Gübelin Jewellery Atelier performs periodic quality tests on precious metals using the industry standard 'scratch test' to confirm the metal's and metal alloy's authenticity.



<sup>2</sup>Precious Metal Alloy: A precious metal alloy is a solid solution containing at least one precious metal

<sup>3</sup>CIBJO The Precious Metals Blue Book, 2020-4-1, p. 6-7

## GÜBELIN JEWELLERY'S DIAMONDS

### Transparency in our Diamond Supply Chain

Gübelin Jewellery uses high quality precious metals and gemstones in its creations.

Gübelin Jewellery uses natural diamonds, deemed 'non-conflict' by the Kimberley Process Certification Scheme (KPCS)<sup>4</sup>, and adhering to the World Diamond Council System of Warranties (WDC SoW)<sup>5</sup>. We purchase polished and cut diamonds only, we do not purchase rough diamonds.



<sup>4</sup> KPCS is the process established in 2003 to prevent “[conflict diamonds](#)” from entering the mainstream rough diamond market by [United Nations General Assembly Resolution 55/56](#) following recommendations in the [Fowler Report](#). The process was set up to ensure that diamond purchases were not financing violence by rebel movements and their allies seeking to undermine legitimate governments. [1]

<sup>5</sup> [Worlddiamondcouncil](#), The System of Warranties (SoW) was introduced by the World Diamond Council (WDC) in 2002, acting on behalf of the World Federation of Diamond Bourses (WFDB) and the International Diamond Manufacturers Association (IDMA), as an industry self-regulation system that would indicate that diamonds being sold comply with the minimum requirements of the Kimberley Process Certification Scheme (KPCS), which was scheduled to be launched at the beginning of 2003. Unlike the KPCS, the SoW covers not only the trade in rough diamonds, but also the trade in polished diamonds and jewellery set with diamonds, and it intended to be applied each time diamonds changed hands, and not only when they are exported from one country or region to another.

## Diamond Descriptions

Gübelin Jewellery uses the following metrics (also known as the 4 Cs) to evaluate the quality of a diamond:

- **Carat:** unit of weight of a diamond, gemstone, synthetic stone or cultured pearl, one carat being equivalent to 200 milligram (1/5 gram).
- **Cut:** shape, proportions and finish of a diamond.
- **Clarity:** relative degree to which a diamond is free of internal characteristics/inclusions and external characteristics/blemishes.
- **Colour:** relative absence (colourlessness) or presence of hue.

Gübelin Jewellery does not use treated diamonds in its jewellery creations.

Gübelin Jewellery does not use (artificial) simulants or laboratory grown/synthetic diamonds in its jewellery creations.

## Sourcing Statement

### Diamonds from Russia

In line with our Commitment to Ethical Sourcing as well as the World Diamond Council System of Warranties and the Responsible Jewellery Code of Practices, Gübelin Jewellery implemented enhanced due diligence procedures since March 2022 to mitigate the purchase of diamonds originating from Russia. We are working with our suppliers to ensure that to the best of our knowledge diamonds are not originating from Russia. We will disengage with any supplier who is not willing to adhere to these enhanced procedures, and will only work with suppliers that make best efforts to ensure that Russian diamonds do not enter into the Gübelin Jewellery supply chain.

For more information about our Commitment to Ethical Sourcing and our Supplier Code of Conduct, please visit: [www.gubelin.com](http://www.gubelin.com)





## GÜBELIN JEWELLERY'S COLOURED GEMSTONES



### Transparency in our Coloured Gemstone Supply Chain

In our quest to find the most inspirational and highest quality coloured gemstones, we go to the far corners of the world. Many of those gemstones are unearthed from remote places and are mined by hand. In fact, artisanal small-scale miners provide the majority of coloured gemstones worldwide – and the trade is complex. We have Due Diligence & KYC procedures in place as part of our gemstone sourcing practices and work to establish traceability and provenance where possible, we mitigate social and environmental risks wherever we can, in accordance with the RJC Code of Practices provisions 6, 7, 12 and 14. For more information about our Journey to Transparency and our Commitment to Ethical Sourcing, please visit [www.gubelin.com](http://www.gubelin.com).

We, at Gübelin Jewellery, want to be a force for good in protecting human rights, strengthening the social, economic, environmental benefits and empowerment of artisanal and small scale miners and their communities. We are committed to being the partner of choice for those suppliers that want to engage transparently and ethically to solve challenges together.

Gübelin Jewellery uses high quality gemstones in its creations. In order to ensure their quality, we adhere to our own Gübelin Jewellery Quality Guidelines,<sup>6</sup> Gübelin Gemstone Rating system, the RJC COP and The World Jewellery Confederation (CIBJO) Gemstone Blue Book Guidelines, which has developed the international standards for product disclosure and publications outlining terminology and classification guidelines for coloured gemstones.

- Gübelin Jewellery does not use any laboratory grown/synthetic coloured gemstones.
- Gübelin Jewellery does not use any composite (or assembled) coloured gemstones.
- Gübelin Jewellery does not use reconstructed coloured gemstones.
- Gübelin Jewellery does not use any artificial (simulants) products to imitate the appearance coloured gemstones.

More information about Gübelin Jewellery's 'Journey to Transparency' can be found at [www.gubelin.com](http://www.gubelin.com)



<sup>6</sup> CIBJO/Coloured Stone Commission 2020-12-1

## Coloured Gemstone Descriptions

At Gübelin Jewellery, we evaluate the quality of our gemstones and describe them using the following criteria:

**Colour** is the property of gem materials that change from one apparent colour to another apparent colour when moving between different sources of light such as daylight equivalent and incandescent equivalent light.

Gübelin Jewellery uses trade colour terms such as ‘pigeon blood’ for rubies or ‘royal blue’ for sapphires as descriptions when gemstones have been analysed and accompanied by a Gübelin Gemmological Report stating the terminology’s validity.

**Shape** is the outline of a gemstone when viewed perpendicular to the table facet.

**Cut** is the style or form in which gemstones and artificial products have been fashioned, i.e. emerald cut, brilliant cut, etc.<sup>7</sup>

**Carat** is the unit of weight of a diamond, gemstone, synthetic stone, cultured pearl, one carat being equivalent to 200 milligram (1/5 gram).

**Species of the gemstone:** Gübelin Jewellery only uses gemstones classified as minerals <sup>8</sup> and Biogenic gem materials such as pearls.

## Gübelin Gemstone Rating

In 2020, the Gübelin Gem Lab launched the Gübelin Gemstone Rating system to develop a common language to uniformly evaluate coloured gemstones through: quality, rarity and salience of a specific gemstone translating to a number – the Gübelin Points.

The Gübelin Gemstone Rating can be applied to the major types of high-value coloured gemstones. The rating procedure assesses different characteristics of the gemstone that contribute to its beauty, its rarity and its attractiveness. It gives meaningful orientation for both private consumers and professionals who wish to get a comprehensive rating for their gemstones; we offer this ranking as the trade and the consumers become more digital and cannot physically see and touch them.

For more information about the Gübelin Gemstone Rating, visit [www.gubelingemlab.com](http://www.gubelingemlab.com).



<sup>7</sup> CIBJO/Coloured Stone Commission 2020-12-1, p. 23

<sup>8</sup> Mineral: a mineral is an element or chemical compound that is normally crystallised and that has been formed as a result of geological processes.

## Treatments

Gemstones are routinely enhanced to improve their appearance, stability and durability by different methods. Rubies, sapphires and other coloured gemstones are likely to be heated. This **treatment**<sup>9</sup> is permanent. Emeralds are periodically oiled by various resins and oils. This **treatment** is stable, but not permanent. All of these enhancements are very common and accepted by trade. Gübelin Jewellery does not make determinations about treatments of coloured gemstones without a Gübelin Gemmological Report.

Gübelin Jewellery accepts heat treatment and heat treatment with residues in healed fissures up to a minor degree, all other corundum treatments (rubies and sapphires) such as cavity fillings, beryllium treatment, lead glass fillings, etc. are **not** accepted.

Gübelin Jewellery does not use any hazardous treatments on our gemstones.

## Origin

Gübelin Jewellery provides country of origin where possible for coloured gemstones when gemstones have been analysed and accompanied by a Gübelin Gemmological Report stating place of origin and how it is determined.

To optimize the declaration of our gemstones, we ask our suppliers to add as much information as possible to their delivery notes and invoices about the gemstones (shape/cut, size, carat, colour, origin and treatment) We acknowledge that for gemstones unaccompanied by a Gübelin Gemmological Report or other equivalent laboratory report, accurately identifying the treatment and origin of the gemstones can be challenging and sometimes impossible.

When Gübelin Gemmological Reports are not available for the gemstones in our fine jewellery creations, our sourcing teams accurately disclose the stones' carat size, colour, and cut/shape, species of stone in Gübelin Jewellery's Order Management system where the information can be easily accessed by the Order Management teams and the Gübelin Boutiques. The suppliers we work with for these coloured gemstones, are trusted business partners who know and consistently deliver our standards of quality.



<sup>9</sup> **Treated gemstones:** Gemstones that have been treated by ways other than normal lapidary practices to change their appearance and or durability; **Treatment:** a practice that artificially changes the appearance and/or the durability of a gemstone or gem material by applying heating, diffusion, irradiation, filling, coating or other artificial processes CIBJO Blue Book Gemstone Guidelines, p. 27



## Sourcing Statements

### **Gemstones from Myanmar (Burma)**

Gübelin Jewellery has decided to suspend purchasing gemstones exported from Myanmar from February 2021 until we feel secure that our purchases align with our ethical sourcing policy. We have enhanced due diligence procedures in place to ensure that any stones we purchase originating from Myanmar are stated on a Gübelin Gemmological Report.

### **Gemstones from Afghanistan**

In line with our commitment to Ethical Sourcing and our Due Diligence policies, Gübelin Jewellery has decided to suspend purchasing gemstones exported from Afghanistan as of August 2021, until we feel secure that our purchases align with our Ethical Sourcing Policy. Given the current situation, mining in Afghanistan, including in the Panjshir Region, is considered high risk sourcing. We will regularly assess the situation.

We are currently applying enhanced due diligence procedures to ensure that for every stone we purchase, which is or may be originating from Afghanistan, its origin is stated on a Gemmological Report from the Gübelin Gem Lab.

## DUE DILIGENCE

### Gübelin Jewellery's Due Diligence systems

As we work towards creating change in the trade, recognizing the political, social, economic and environmental complexities in countries where some of our precious materials are sourced, we take action with our commitment to Ethical Sourcing.

We have been a member of the RJC (Responsible Jewellery Council) since 2019 and adhere to their Code of Practices (COP) on diamonds, coloured gemstones and precious metals. Using the RJC's COP guidance, we have implemented Know Your Counterparty Procedures with all of our suppliers. We conduct human rights due diligence in accordance with COP 6 as well as RJC's COP 7: adhering to the OECD's (Organization for Economic Co-operation Development) 5 Step Framework in Due Diligence for Responsible Mineral Supply Chains in Conflict and High Risk Areas in addition to the OECD Due Diligence Guidance Supplement on Gold. We work with suppliers that we know and trust and with whom we maintain long standing business relationships. We conduct on-going Due Diligence with our long term suppliers as well as on site audits and inspections where necessary.

We have crafted the Gübelin Jewellery Supplier Code of Conduct, available on our website, [www.gubelin.com](http://www.gubelin.com), which all of our suppliers must sign and we expect them to adhere to. Should we be made aware of any violations to our Code of Conduct; Grievance, Mitigation and possibly Remediation procedures are triggered and we take action to either support our supplier in becoming more transparent or end the relationship entirely.

Gübelin Jewellery's Grievance Procedure, our contact details, and our policy on grievances are detailed on our website, [www.gubelin.com](http://www.gubelin.com). Additionally, our Supplier Code of Conduct makes clear to our business partners and suppliers the expectation that they apply the United Nations (UN) Guiding Principles for Business and Human Rights in their own organisations, purchase from legitimate sources in compliance with UN Resolutions, adhere to the Kimberley Process Certification Scheme (KPCS) and the World Diamond Council system for warranties.



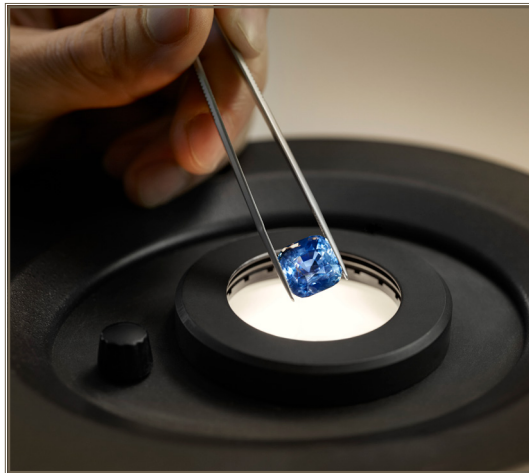
The World Jewellery  
Confederation



RESPONSIBLE  
JEWELLERY  
COUNCIL

## What is Gübelin Jewellery's Due Diligence?

- **Assessing actual and potential conflict sourcing and human rights risks**  
Gübelin Jewellery assesses risks with due diligence experts, sourcing teams and ethical sourcing partners. We review due diligence paperwork regularly, make action plans and once a year review and make recommendations to Senior Management about our sourcing strategy for the coming year.
- **Integrating and acting upon the findings**  
Gübelin Jewellery's sourcing teams and ethical sourcing partners rank suppliers regularly and engage with suppliers on a regular basis with in person meetings, video calls or phone calls in order to gain more insight and information about their supply chains so we can better support our responsible sourcing commitment.
- **Tracking responses**  
Gübelin Jewellery's ethical sourcing teams document all conversations with suppliers, and records meeting minutes and action steps so we can see the progress of our responsible sourcing initiatives unfold.
- **Communicating how risks are addressed**  
We regularly update Senior Management, our sourcing teams and companywide how we mitigate risks in our supply chain. An example would be our enhanced due diligence procedure for Myanmar/Burma, Afghanistan and Russia in light of the events of February and August 2021 as well as February 2022 respectively.



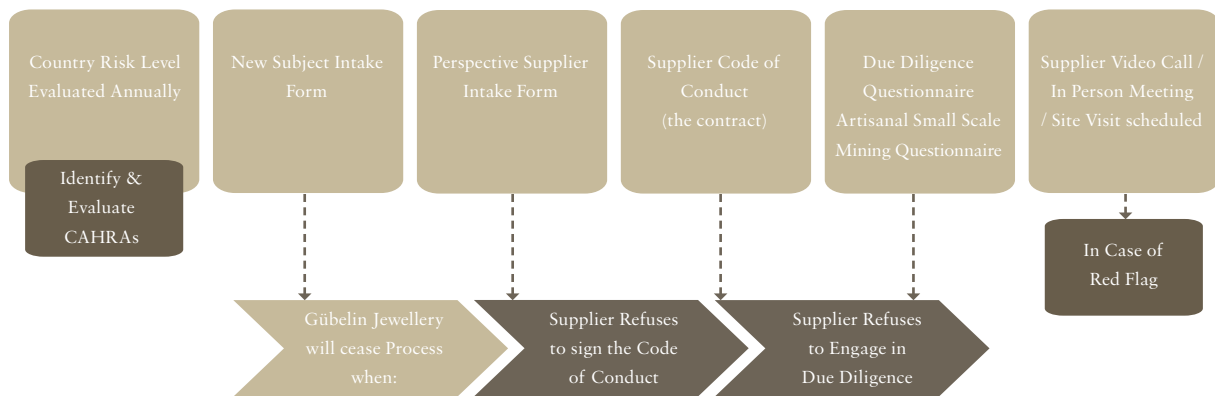
## When does Gübelin Jewellery carry-out Due Diligence?

As Human Rights & Environmental risks can change over time; supplier Due Diligence is regularly conducted:

- Every time Gübelin Jewellery starts a new activity or business relationship
- If Gübelin Jewellery receives a grievance or allegation about one of our suppliers
- When we begin sourcing new products or from a new country
- When the country we sourcing from, undergoes a change that affects the risk of human rights (e.g., political change).

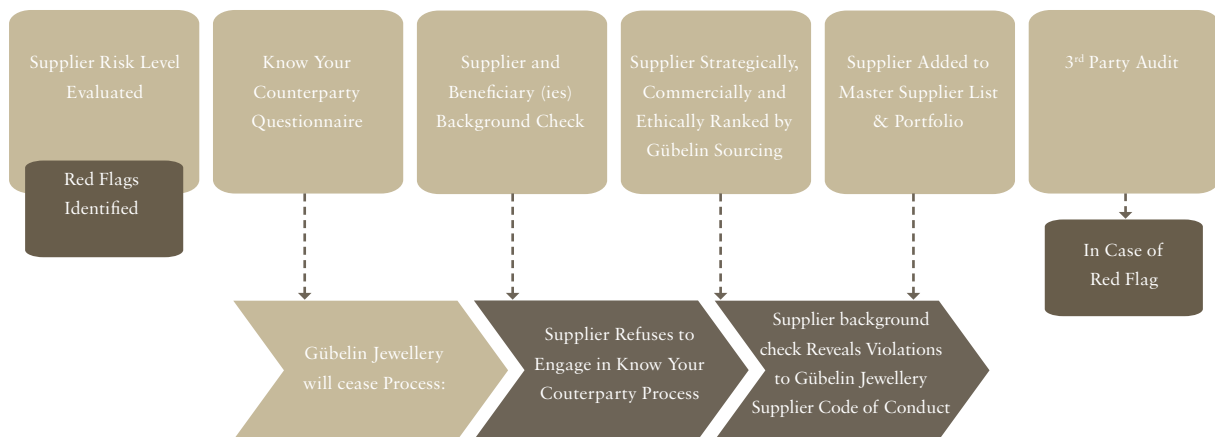
### Step 1:

#### Gübelin Jewellery Due Diligence Systems



### Step 2:

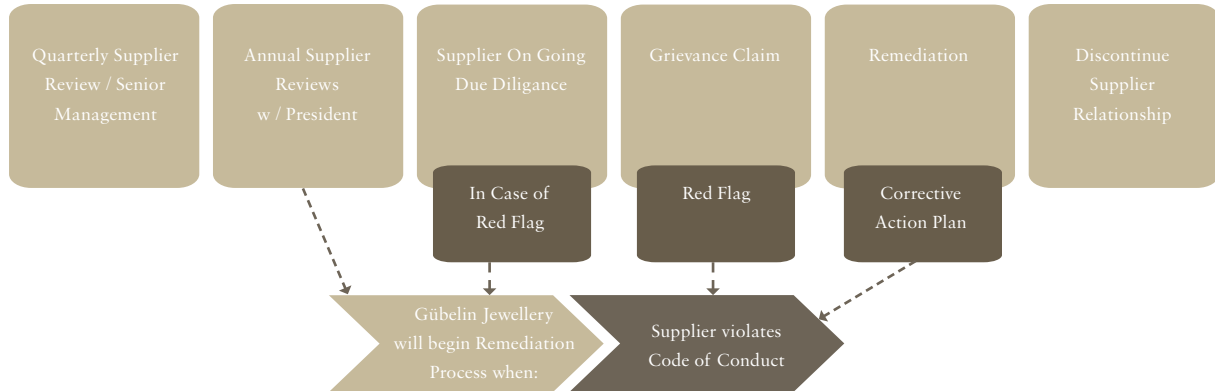
#### Gübelin Jewellery Due Diligence Systems





Step 3:

Gübelin Jewellery Due Diligence Systems



Based the Due Diligence we carried out as of 2021, we have identified the following action steps for 2022:

- Deeply Engage with suppliers who are RJC CoP & CoC certified
- Continue to Mitigate Risks in our Supply Chain through regular supplier exchanges, supporting and encouraging RJC Certification, on site visits
- Encourage more suppliers to use Provenance Proof technologies and services
- Continue to Identify Red Flags, Integrate the findings into our sourcing strategy, strengthen our supplier relationships, establish new ethical sourcing partnerships
- Conduct On-Going Due Diligence with core suppliers through including site visits, video calls
- Monitor political and social climate shifts in *Russia, Afghanistan and Myanmar*
- Develop & Implement a 3rd Party Auditing Strategy

## PRODUCT WARRANTY



### Warranty Statement for Gübelin Jewellery customers

Each creation from Gübelin Jewellery is accompanied by a warranty stating the possibility of gemstone treatment:

*Gemstones may have been treated to enhance their visual appearance and / or stability. Coloured gemstones accompanied by a Gübelin Gemmological Report will include detailed information and in-depth analysis of possible treatments.*

## CARE RECOMMENDATIONS

### How to care for Gübelin Jewellery's Precious Metals

Gold and platinum are soft metals that can be easily scratched. To help avoid this, Gübelin Jewellery suggests to store each piece of jewellery separately. Most gold and platinum jewellery can be cleaned at home with mildly soapy water and a soft toothbrush. However, we suggest to have jewellery polished by an expert from time to time. For more information about care of our Gübelin Jewellery precious metals, please visit [www.gubelin.com](http://www.gubelin.com).

### How to care for Gübelin Jewellery's Diamonds

Gübelin Jewellery suggests diamonds should to be cleaned once a month by carefully placing diamond jewellery in tepid water with a mild, pH-neutral soap and cleaned with a soft toothbrush. We recommend then rinsing the diamonds under running water and drying them with a soft cloth. To maintain their shine, they should be regularly polished with a soft cloth. We recommend our Gübelin care cloth for this purpose. For more information, please visit [www.gubelin.com](http://www.gubelin.com).

## How to care for Gübelin Jewellery's Coloured Gemstones

Precious stones have an exceptional beauty, rarity and longevity. But hard as they are, they still require particular attention and care. Gübelin Jewellery suggests to keep gemstones safe from knocks and impacts of any kind, this is especially important for emeralds, which are much more delicate than most other gemstones. With the exception of emeralds, precious stones can be cleaned from time to time in tepid, soapy (pH-neutral) water. Dirt can be carefully removed with a very soft toothbrush. For emeralds, we suggest to clean them with room temperature water only.

After cleaning, we suggest rinsing the gemstone well under running water, and drying it gently with a soft cloth. For more information about coloured gemstone care, please visit [www.gubelin.com](http://www.gubelin.com).

