

GÜBELIN JEWELLERY SUPPLIER CODE OF CONDUCT

Gübelin Jewellery expects its suppliers with whom we do business to embrace and comply with the commitments to integrity laid out in this Supplier Code of Conduct:

1. Agree to meet Gübelin Jewellery's Commitment to Ethical and Responsible sourcing which form an integral part of this Code of Conduct
2. Share information with Gübelin Jewellery honestly, openly, transparently, and proactively
3. Apply Gübelin Jewellery's Code of Conduct in all of its business dealings and practices
4. Communicate the requirements of the Code of Conduct to employees, subcontractors and suppliers involved in sourcing for Gübelin Jewellery
5. Reference the Code of Conduct in contracts when sourcing for Gübelin Jewellery
6. Actively communicate with Gübelin Jewellery about any material changes about your sourcing and any potential risks to compliance with the Code of Conduct
7. Regularly assess compliance against the Code of Conduct (including conducting Due Diligence on existing and new suppliers) as well as identify any other human rights risks, labour rights risks, conflict sourcing risks, or potential breaches in ethical conduct
8. Report any and all risks or breaches to Gübelin Jewellery in a timely manner
9. Take action to mitigate and/or remediate risks and report these actions to Gübelin Jewellery
10. Apply the UN (United Nations) Guiding Principles for Business and Human Rights, including:
 - Protecting and respecting human rights throughout your business operations
 - Avoiding causing or contributing to adverse human rights impacts through your own activities and addressing such impacts when they occur
 - Seeking to prevent or mitigate adverse human rights impacts that are directly linked to your operations, products or services by your business relationships, even if you have not contributed to those impacts
 - Addressing adverse human rights impacts with which you are involved
 - Where you have caused or contributed to adverse impacts, providing for or cooperating in their remediation through legitimate processes
11. Comply with all applicable laws and regulations relating to your activities
12. Engage in responsible business practices and not engage in or condone corrupt practices including fraud, bribery, tax evasion, money laundering and armed conflict
13. Adhere to all applicable international sanctions when sourcing and trading.

14. Ensure the following conditions are adhered to in your own operations and in operations from which you contract and/or source from:
 - No use of child labour or worst forms of child labour and no hazardous work for children under 18
 - No forced, compulsory, trafficked or bonded labour
 - No discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation
 - No harsh or inhumane treatment
 - Working conditions are safe and hygienic
 - Employees are compensated in accordance with national law and ILO (International Labour Organization) Conventions
 - Remuneration and working hours comply with national laws and collective agreements
 - Overtime is voluntary and is compensated in accordance with national law
 - The right of employees to freedom of association and collective bargaining are recognised and respected
15. Respect the environment by:
 - Complying with all environmental laws and regulations relating to your activities in the countries in which you operate
 - Identifying any environmental risks in your sourcing and putting in protection and/or remediation systems if needed
16. Fully disclose when you have dealings or are linked with Politically Exposed Persons (PEPs), their families or their close associates. PEPs are individuals who are or have been entrusted with prominent public functions in a foreign country, for example Heads of State or of government, senior politicians, senior government, judicial or military officials, senior executives of state owned corporations, important political party officials. Their status and influence can put these individuals in positions that can be potentially abused to commit money laundering and related predicate offences, including corruption and bribery, as well as activities related to terrorist financing. As part of our Know Your Counterparty (KYC) Procedures, we have systems in place to check if this is the case.
17. For all precious materials sourcing:
 - Work with written contracts and purchase orders so that all business dealings are transparent and accurately reflected on business books and records
 - Exercise Due Diligence in compliance with the OECD (Organization for Economic Co-operation Development) 5-step Due Diligence framework
 - Have a policy with respect to sourcing from conflict-affected and high-risk areas
 - Purchase from legitimate sources and not funding conflict and in compliance with UN Resolutions
 - Identify sources and country of origin of materials, subcontractors and intermediary traders wherever possible and report changes in sourcing
 - Encourage membership and compliance with the Responsible Jewellery Council's (RJC) Code of Practices
18. If sourcing diamonds:
 - Adhere to the Kimberley Process Certification Scheme (KPCS) and the World Diamond Council system for warranties.

19. If sourcing precious metals:

- Implement the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRA) (OECD DD Guidance)
- Implement the OECD Due Diligence Guidance Supplement on Gold as applicable to your operations and supply chains

20. If sourcing gemstones:

- Identify sources and country of origin of materials, subcontractors and intermediary traders wherever possible and report changes in sourcing
- Accurately and honestly describe (identity, authenticity, treatment status and country of origin to be best of knowledge of the supplier) and value gemstones
- Supply all relevant paperwork available with the gemstone, including any certificates, tax invoices, and declared specification of the gemstone and description of the stone. For diamonds, this includes Kimberley Certification and Statement of Warranties
- Use a reputable international courier for shipment of materials (with the exception of Swiss-based suppliers who are authorised by Gübelin Jewellery to deliver the materials) and avoid hand-carry of material which should always be performed in full compliance with export and import laws and other applicable regulations

21. If sourcing from a mine, check and inform Gübelin Jewellery of the following points:

- Identification and registration/licensing of the supplier (e.g. individual, company, an aggregator, an association, or a cooperative, ASM (Artisanal & Small-scale Mining)/LSM (Large Scale Mining))
- Mine location and presence of important facilities such as aggregation points and/or processing points
- In case of ASM, existence of an agreement if the ASM are operating on a large-scale concession
- Existence of basic safety practices in place, PPE (Personal Protective Equipment), equipment & tools
- Measures to protect on-site or nearby water sources from contamination (if any); efforts to protect and restore the land
- Presence of armed groups
- Presence of children at the mine site, child labour during school hours, children involved in hazardous work underground or underwater, working with dangerous machinery and tools, carrying heavy loads, or exposed to hazardous substances
- Signs of forced or compulsory labour, cruel, inhumane, or degrading treatment
- Potential to create economic and development opportunities for the artisanal miners (e.g. support for legalisation and formalisation efforts, support capacity building to improve awareness of and mitigation of your risks, improve health and safety conditions), if applicable

Gübelin Jewellery reserves the right to:

- Conduct inspections at the supplier's site of business operations either by themselves or through third parties (or request inspections and have the information shared with Gübelin Jewellery) in order to verify compliance with this Code of Conduct when sourcing and trading
- Take possession of the product to test for product quality and authenticity prior to deciding whether or not to purchase
- Request reports on the due diligence practices and findings of suppliers
- Request that immediate remediation takes place upon discovery of risks to compliance with or violations of the Code of Conduct
- Cancel outstanding orders, suspend future orders or terminate the business relationship based on non-compliance with the Code of Conduct, including failure to remediate