



ETHICS POLICY

This policy confirms Free Diam's' commitment to respect Human Rights, to not contribute to the financing of conflicts and to respect all applicable UN sanctions, resolutions and laws. It also affirms its commitment to ethical, social and environmental responsibility.

Free Diam's is a certified member of the Responsible Jewellery Council (RJC). As such, we undertake to demonstrate, through independent third-party verification, that we:

- a. Let us respect Human Rights under the Universal Declaration of Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work. In particular, we strongly reject and condemn child labour, forced labour, covert and clandestine labour, and human trafficking.
- b. Do not participate in or tolerate any form of money laundering or terrorist financing.
- c. Support transparency of payments from rights-compliant governments and security forces in the extractive industries.
- d. Provide no direct or indirect support to illicit armed groups.
- e. Strongly reject and condemn any form or attempt of corruption and facilitation payment in any form they present themselves. We commit to support employees who might be faced with any attempt of corruption.
- f. Allow stakeholders to express their concerns about potential ill-treatment at work, corruption, or the jewellery supply chain. To this end, we have put in place and are keeping at the disposal of the parties concerned a complaints mechanism, which can be obtained on request at the following address: free.diams@orange.fr.
- g. Put in place the OECD's five-step framework for the exercise of a risk-based due diligence on the supply chain for diamonds from conflict or high-risk areas:
We also undertake to use our influence to avoid possible abuse by other parties.
- h. Adopt an environmentally responsible attitude and practices to control our impact on the environment.

Concerning serious damage to the extraction, transport or trade of diamonds:

We will not tolerate, assist or facilitate in any way the commission of the following acts, nor will we profit from or contribute to them:

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

**E.U.R.L. au capital de 70 000 Euros Siret 422 987 982 00036 TVA FR 64422987982 Code APE 4649Z
9 rue Buffault 75009 Paris Tél : 01 48 78 68 60 Port : 06 08 45 05 09**





We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are committing abuses described above or are sourcing from, or linked to, any party committing these abuses.

Regarding direct or indirect support to non-State armed groups:

We will not tolerate any direct or indirect support to non-State armed groups or their affiliates including through the supply of diamonds, the payment of money or the provision of logistical, material or other assistance unlawfully engaged in the following activities:

- a. Unlawful control of mining sites or transport routes, points of trade in diamonds and upstream actors in the supply chain.
- b. Illegal taxation or extortion of money or diamonds on mining sites, transport routes or trading points of precious stones, or against intermediaries, exporting companies or international traders.

We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are sourcing from, or are linked to, any party providing direct or indirect support to non-state armed groups as described above.

Regarding public or private security forces:

We affirm 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 law that guarantees Human Rights. We will not provide direct or indirect support to public or private security forces that commit abuses or that act illegally as described in the above paragraphs.

Regarding bribery and fraudulent misrepresentation of the origin of diamonds:

We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of diamonds, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of diamonds.

Regarding money laundering:

We will support and contribute to efforts to eliminate money laundering where we identify a reasonable risk resulting from, or connected to, the extraction, trade, handling, transport or export of diamonds.

E.U.R.L. au capital de 70 000 Euros Siret 422 987 982 00036 TVA FR 64422987982 Code APE 4649Z
9 rue Buffault 75009 Paris Tél : 01 48 78 68 60 Port : 06 08 45 05 09

