

MINERALS
AND METALS
RESPONSIBLE
SOURCING POLICY

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01. SCOPE

As a leading luxury goods group, Compagnie Financière Richemont SA is the owner of prestigious Maisons and businesses, recognised for their excellence in designing, manufacturing, distributing, and selling timeless jewellery, watches, fashion and accessories and creations and renowned for their distinctive heritage (together "**Richemont**" or the "**Group**").

Reinforcing its dedication to honest, ethical business practices and compliance with applicable laws and regulations, Richemont has adopted the Minerals and Metals Responsible Sourcing Policy (the "**Policy**"). This Policy supplements the Group's Standards of Business Conduct, the Group's Supplier Code of Conduct and the Richemont Human Rights Statement. It defines the expectations for suppliers (the "**Suppliers**") and Richemont's commitment and position on the responsible sourcing of the following minerals and metals: Diamonds, Coloured Gemstones, Gold, Silver, Platinum, Palladium, Rhodium, Tantalum, Tin and Tungsten (the "**Minerals and Metals**"), specifically addressing the Group's approach to Minerals and Metals originating from Conflict-Affected and High-Risk Areas (CAHRAs).

The Group is implementing the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAs, encompassing the OECD Guidance Supplement on Gold. This set of guidance defines the Group's management process for risk-based due diligence for responsible supply of these Minerals and Metals. Specifically for Diamonds, the Group is complying with the Kimberley Process Certification Scheme and the World Diamond Council System of Warranties.

Each Group affiliate is expected to adhere to this Policy, make it available to their employees (the "**Employees**"), directors, temporary staff, contractors, agents and consultants (the "**Associated Persons**") and take the necessary alignment and implementation measures. Employees and Associated Persons are responsible for familiarising themselves with and complying with this Policy, and promptly reporting any suspected or known breaches.

This Policy sets out minimum standards for the Group. Where this Policy conflicts with local laws, regulations or established industry codes, Group affiliates, Employees and Associated Persons must adhere to the more stringent requirements.

02. KEY PRINCIPLES

The Group endeavours to:

- a) respect human rights according to the Universal Declaration of Human Rights and International Labour Organization Declaration on Fundamental Principles and Rights at Work.
- b) not engage in or tolerate bribery, corruption, money laundering, terrorism financing, or conflict financing, adhering to relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing them.
- c) support transparency of government payments and rights-compatible security forces in the extractives industry.
- d) not provide direct or indirect support to illegally armed groups; and
- e) enable stakeholders to voice concerns about the Minerals and Metals supply chain.

03. PREVENTION OF ABUSE

The Group also commits to using its influence to prevent abuses by Suppliers.

Richemont's Speak Up Platform (the "**Platform**") is the Group's whistleblowing and grievance reporting line, through which its stakeholders, including the Suppliers, its workers, and other third parties can raise concerns when they notice situations inconsistent with its Standards of Business Conduct or the law.

If Richemont receives substantive allegations of violations or misconduct, it will assess and investigate them in accordance with the Group's Speak Up Policy and, where required by law, will disclose all relevant information regarding such allegations. Richemont will not tolerate any retaliation against anyone who reports in good faith or assists in investigations regarding any conduct believed to violate applicable laws or this Policy.

04. SERIOUS ABUSES ASSOCIATED WITH THE EXTRACTION, TRANSPORTATION OR TRADE OF MINERALS AND METALS

The Group will not tolerate, profit from, contribute to, assist with or facilitate the commission of:

- a) torture, cruel, inhumane and degrading treatment.
- b) forced or compulsory labour.
- c) the worst forms of child labour (1).
- d) other gross human rights violations and abuses; or
- e) war crimes, violations of international humanitarian law, crimes against humanity or genocide.

¹ See ILO Convention No. 182 on the Worst Forms of Child Labour (1999).

05. DIRECT OR INDIRECT SUPPORT TO NON-STATE ARMED GROUPS

The Group only sells or purchases Diamonds that are fully compliant with the Kimberley Process Certification Scheme and, as such, will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring Diamonds from, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates who illegally:

- a) control mining sites, transportation routes, Diamond-trading areas and upstream actors in the supply chain; or
- b) tax or extort money or Diamonds at mining sites, along transportation routes or in Diamond-trading areas, from intermediaries, export companies or international traders.

06. RESPONSIBLE DISENGAGEMENT

The Group, when confirmed adverse impacts are reasonably attributable (i) to serious abuses described in paragraph 4 or (ii) to parties providing direct or indirect support to non-state armed groups as outlined in paragraph 5, will address them in line with responsible disengagement principles, which include suspension or termination of the relationship with the relevant Suppliers.

07. PUBLIC OR PRIVATE SECURITY FORCES

The Group affirms 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 legislation guaranteeing human rights. The Group will not provide direct or indirect support to public or private security forces that commit any of the abuses described in paragraph 4 above or that act illegally as described in paragraph 5 above.

08. BRIBERY AND FRAUDULENT MISREPRESENTATION OF THE ORIGIN OF MINERALS AND METALS

The Group will not offer, promise, give or demand bribes, and will resist bribe solicitation. This includes bribes used to conceal or disguise the origin of Minerals and Metals, or to misrepresent taxes, fees and royalties paid to governments for the purposes of their extraction, trading, handling, transportation or exportation.

09. MONEY LAUNDERING

The Group will support and contribute to efforts to eliminate money laundering if it identifies any reasonable risk arising from or connected to the extraction, trading, handling, transportation or exportation of Minerals and Metals.

10. GUIDANCE

If you are unsure about whether a particular act constitutes a violation of this Policy, or if you have any question regarding the interpretation of this Policy, you may contact Group Legal or submit your question confidentially on the Q&A tool on the [Platform](#).

11. BREACHES OF THE POLICY

Richemont takes breaches of its policies, including this Policy, seriously. Violations of this Policy may lead to disciplinary or other appropriate action, potentially including the termination of contractual relationships with Employees or Associated Persons, and legal action if necessary.