

APRIL 2023

RAW MATERIAL SOURCING POLICY

RICHEMONT

The Group requirements

1. Our commitments

We are committed to respecting human rights, avoiding contributing to the financing of conflict and complying with all relevant UN sanctions, resolutions and laws.

We commit to:

- (a) respecting human rights according to the Universal Declaration of Human Rights and International Labour Organization Fundamental Rights at Work;
- (b) not engaging in or tolerating bribery, corruption, money laundering or the financing of terrorism;
- (c) supporting transparency of government payments and rights-compatible security forces in the extractives industry;
- (d) not providing direct or indirect support to illegally armed groups; and
- (e) enabling stakeholders to voice concerns about our supply chain, including any concern regarding minerals and metals originating from conflict and high-risk areas, child labour or any type of actual or potential human rights violation and abuse happening within our supply chain.

In addition, we are implementing the OECD 5-Step framework as a management process for risk-based due diligence to ensure the responsible supply of minerals from conflict-affected and high-risk areas and to assess the risks of child labour within our supply chains.

2. The prevention of abuse

We also commit to using our influence to prevent abuses by others.

3. Regarding serious abuses associated with the extraction, transportation or trade of gold, diamonds and coloured gemstones

We 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 (*);
- (d) other gross human rights violations and abuses such as widespread sexual violence; or
- (e) war crimes, violations of international humanitarian law, crimes against humanity or genocide.

We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are committing any of the abuses described in this paragraph 3 or are sourcing from, or linked to, any party committing such abuses.

4. Regarding child labour

We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are committing any of the worst forms of child labour (*) or are sourcing from, or linked to, any party committing such abuses.

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

We only sell or purchase 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.

We will immediately stop engaging with upstream suppliers if we reasonably suspect that they are sourcing from, or are linked to, any party providing direct or indirect support to non-state armed groups as described in this paragraph 4.

6. 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, and in accordance with laws that guarantee human rights. We will not provide direct or indirect support to public or private security forces that commit any of the abuses described in paragraph 3 above or that act illegally as described in paragraph 4 above.

7. Regarding bribery and fraudulent misrepresentation of the origin of gold, diamonds and coloured gemstones

We will not offer, promise, give or demand bribes and we will resist the solicitation of bribes to conceal or disguise the origin of gold, diamonds and coloured gemstones, or to misrepresent the taxes, fees and royalties paid to governments for the purpose of the extraction, trading, handling, transportation or exportation of gold, diamonds and coloured gemstones.

8. Regarding money laundering

We will support, and contribute to, efforts to eliminate money laundering where we identify any suspicious activity that results from, or is connected to, the extraction, trading, handling, transportation or exportation of gold, diamonds and coloured gemstones.

April 26th 2023.

Jean-Pierre Jacquemin



Responsible Sourcing Director

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