

## Business Partner & Supplier Code of Conduct

### INTRODUCTION:

COOKSON-CLAL believes that the continuous advancement in its ethical, social and environmental performance is a fundamental component of the excellence of the products delivered to clients.

COOKSON-CLAL aligns its company policies with the Responsible Jewellery Council Codes of Practice and other standards like the principles stipulated in the Conventions of the International Labour Organization, the Universal Declaration of Human Rights, the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises and the United Nations Women's Empowerment Principles. These Standards intend to provide clients with the trust that our value chain, from mining to retail, is managed responsibly.

In order to foster its commitment, COOKSON-CLAL wants to ensure the responsible sourcing of all its units and for all the materials used in its products.

In the conduct of its activities, COOKSON-CLAL is committed to complying with all applicable laws, regulations and national and international conventions, as well as with best practices, in particular with regard to ethics, human rights, social responsibility and protection of the environment.

COOKSON-CLAL works with business partners and suppliers who agree to comply with the requirements of this Code of Conduct, with the ethical principles set out in paragraph 2 above, and with the laws applicable to their businesses

When national legislation or other applicable regulations address the same issue as this Business Partner & Supplier Code of Conduct, the highest standards or most restrictive provisions shall apply. When this Business Partner & Supplier Code of Conduct is in contradiction with applicable law, the applicable law shall apply.

Our business partners & suppliers remain guarantors towards COOKSON-CLAL for work performed by their subcontractors and suppliers and guarantee respect by their subcontractors and suppliers of this Business Partner & Supplier Code of Conduct and relevant obligations.

In the event of any violation of this Business Partner & Supplier Code of Conduct by the business partner or one of its suppliers or subcontractors, COOKSON-CLAL reserves the right to review the business relationship and possibly terminate it in conformity with applicable law, even if there is no written contract formalizing this relationship, without prejudice to the other rights of COOKSON-CLAL or remedies it might seek.

### 1. HUMAN RIGHTS

COOKSON-CLAL requires its business partners & suppliers to make their best effort to respect human rights in their conduct:

- Prohibition of child labor: Work by children under the age of 16 is strictly prohibited. In countries where local laws set a higher age for child labor or set an age for completion of compulsory education higher than 16, the highest age is applicable. Any work which is likely to jeopardize children's physical, mental or moral health, safety or morals should not be done by anyone under the age of 18.
- Prohibition of forced labor: Any use of forced labor, slavery, servitude or trafficking in human beings by our suppliers, as well as withholding identity papers or work permits or requiring workers to deposit a bond or the use of any other constraint, is strictly prohibited. All workers are entitled to accept or leave their employment

freely. Business partners & suppliers may not require workers to work to repay a debt owed to them or to a third party.

- Prohibition of harassment and abuse: We expect our suppliers to treat their workers with respect and dignity. Our business partners & suppliers may not tolerate or engage in any form of corporal punishment, physical, sexual, verbal or psychological harassment or any other kind of abuse.
- Prohibition of discrimination: We expect our business partners & suppliers to treat all workers equally and fairly. Our suppliers may not engage in any kind of discrimination – in particular with regard to wages, hiring, access to training, promotion, maternity protection and dismissal – based on sex, race or ethnic origin, religion, age, disability, sexual orientation, political affiliation, union membership, nationality, gender identity or social background.
- Freedom of association: We require our business partners & suppliers to respect and recognize the right of workers to negotiate collectively, and to create or join labor organizations of their choice without any sanction, discrimination or harassment.
- Conflict-affected areas: We require our business partners & suppliers to commit to avoid contributing to conflicts and put in place all the measures necessary to assure the traceability of minerals and raw materials.
- Use of Security forces: We require our business partners & suppliers using security personnel to ensure that security is provided in an effective and responsible manner.

## 2. LABOR STANDARDS AND SOCIAL RESPONSIBILITIES

COOKSON-CLAL requires its business partners & suppliers to exhibit exemplary social responsibility in their conduct.

- Prohibition of illegal, clandestine and undeclared employment: Our business partners & suppliers are required to comply with all applicable regulations to prevent illegal, clandestine and undeclared employment.
- Wages and benefits: Our business partners & suppliers must at minimum pay wages on a regular basis and no less than monthly, compensate workers for overtime hours at the legal rate and meet all legal requirements relating to worker benefits. If there is no legal minimum wage or rate for overtime pay in the country concerned, the supplier must ensure that the wages are at least equal to the average minimum in the relevant industrial sector and that overtime pay is at least the same as the usual hourly compensation. Wage deductions shall not be used as a disciplinary measure.

We require our suppliers to guarantee that all workers receive benefits stipulated in any applicable collective bargaining agreements, company agreements and other applicable negotiated individual or collective agreements.

- Working hours: Our business partners & suppliers must comply with all local laws and regulations applicable with respect to working hours, which shall not in any case exceed the maximum set by internationally recognized standards such as the International Labour Organization.

Our business partners & suppliers may not impose excessive overtime hours. The total number of hours worked per week including overtime may not exceed legal limits. Workers are entitled to the minimum number of days off established by applicable laws and at minimum must have at least one day off in every seven-day period.

- Ensuring health and safety: Our business partners & suppliers are expected to provide their workers with a safe and healthy workplace environment in order to avoid accidents or bodily injuries which may be caused by, related to, or result from their work, including during the operation of equipment or during work-related travel.

Business partners & suppliers are expected to set up procedures and trainings to detect, avoid and mitigate as much as possible any hazards that constitute a risk to the health, hygiene and safety of staff. They are required to comply with all applicable local and international regulations and laws in this regard. These same principles are applicable to housing provided by suppliers and business partners.

### 3. ENVIRONMENTAL REGULATIONS AND PROTECTION

COOKSON-CLAL takes concrete measures to protect the environment within its scope of activities, this includes cooperation with its business partners & suppliers to ensure application of best practices throughout the supply chain.

COOKSON-CLAL expects its suppliers to share this commitment. It encourages initiatives by its business partners & suppliers to reduce the environmental impact of their activities, notably through the use of green technologies.

COOKSON-CLAL requires that its business partners & suppliers respect local and international environmental regulations and standards, that they obtain all requisite environmental permits and that they be able to prove effective implementation of the following:

- Application of an environmental management system;
- Improvements in the environmental performance of their sites and production resources, in particular through proper waste management, elimination of air, water and soil pollution,
- Reduction of greenhouse gas emissions with an emphasis on use of renewable energies, reduction of water and energy consumption and safe management of hazardous chemicals;
- Measures to preserve biodiversity and guarantee regulatory traceability and compliance for raw materials and substances used;
- Best practices across their supply chain to respect animal welfare;
- Contributions to continuous improvements in environmental performance throughout the lifecycle of our products
- Ensure that staff whose work has direct environmental impact are trained, skilled and have the resources required to effectively perform their work.

### 4. BUSINESS INTEGRITY REQUIREMENTS

COOKSON-CLAL requires exemplary integrity from its business partners & suppliers in the conduct of their business activities.

Legal requirements: We expect our business partners & suppliers to act in full compliance with local, national and international laws in the conduct of their business.

Prohibition of all forms of corruption: COOKSON-CLAL applies a zero-tolerance policy concerning corruption. We expect our business partners & suppliers to respect all applicable laws concerning corruption and to take appropriate measures to prevent, detect and sanction any corruption, directly or indirectly, across the scope of their activities.

Prevention of conflicts of interest: We require our business partners & suppliers to comply with all applicable laws concerning conflicts of interest and to make every effort to prevent the occurrence of situations that create a conflict of interest within the scope of their business relationship with COOKSON-CLAL.

Prohibition of money-laundering and finance of terrorism: Money-laundering occurs where an action is taken to mask the true origin of money or assets that are connected to criminal activity. We require our business partners & suppliers to take all appropriate measures to prevent their operations from being used as vehicles for money-laundering.

**Respect of competition:** Our business partners & suppliers must be committed to compliance with competition law applicable in their host countries. This includes prohibiting abuse of dominant position, concerted practices or unlawful agreements between competitors.

**Confidentiality:** Our business partners & suppliers must be committed to taking all necessary measures to guarantee the confidentiality of professional secrets and other non-public information they receive in the course of their business relationship with COOKSON-CLAL.

**Protection of personal information:** We require our business partners & suppliers to comply with all applicable laws and regulations concerning the protection of personal information.

**Customs and security authorities:** We require our business partners & suppliers to comply with applicable customs laws, including those relating to imports and the ban on transshipment of merchandise to the importing country.

**Trade restrictions and international sanctions:** We require our business partners & suppliers to respect international trade restrictions and sanctions, taking into account any changes in these measures, as well as all laws and regulations concerning export controls

**Gifts and invitations:** Gifts or invitations may be considered acceptable expressions of courtesy within the context of good business relations if limited in scope and value, given openly and transparently, permitted under applicable local law, customary in the location in which they would be given, provided to reflect esteem or gratitude, and not offered with an expectation that something will be offered in return. In some cases, these practices might be subject to anticorruption regulations or other legal requirements, making it essential to be aware of such rules and to fully comply with them.

**Protection of assets:** Our business partners & suppliers are required to take all necessary measures to protect the resources and assets of COOKSON-CLAL, including its intellectual property rights.

**Information transparency:** Our business partners & suppliers are required to provide clear and accurate information regarding the characteristics of the products or services supplied, and to refrain from making any misleading claims.

## 5. INSPECTION AND AUDIT

**Inspection:** We reserve the right to confirm compliance with these principles and to conduct compliance audits at our business partners & suppliers and their own business partners & suppliers and subcontractors. Our business partners & suppliers must provide all necessary information and facilitate access by representatives of COOKSON-CLAL seeking to verify compliance with the requirements in this Code. Business partners & suppliers must commit to improving or correcting any deficiencies identified. COOKSON-CLAL may also support its business partners & suppliers in implementing and applying best practices in order to resolve minor non-conformity issues.

**Accurate records and access to information:** Our business partners & suppliers are required to keep proper records to demonstrate compliance with this Business Partners & Supplier Code of Conduct. They must provide our representatives with access to complete, original and accurate records.

Lyon, 10<sup>th</sup> of January 2025



Mr. Philippe Souquet, Director