

Code of Conduct

JUNE 2021

RUBEL  MÉNASCHÉ

Rubel & Méнасché is committed to meeting the most demanding standards of responsible practices. We place ethics at the heart of conducting the Maison's business and have made a firm commitment to building and maintaining a relationship of trust with our partners in the broadest sense.

To face the challenges of the diamond industry and in view of the commitments the Maison has made to its partners, we established the Ethical Charter a few years ago, which set out the rules of conduct that all our employees must follow.

Today, we are updating, enriching and clarifying it to account for changes in the trades and our ecosystem. The Ethical Charter is now our Code of Conduct.

This Code is a reference framework that should give us guidance on what is expected of each of us in the course of our professional activity. It also reaffirms our commitment and our intention to be a responsible and socially aware company.

Our management community has a key role to play in the implementation of this Code of Conduct. It has a specific responsibility to embody these shared rules and to guide all our employees by allowing the free expression of doubts and questions and by listening and providing support on a daily basis. This is how the culture of integrity will spread across the board.

These shared rules, practices and principles must guide our conduct in matters of ethics, social responsibility and respect for the environment. Everybody needs to adhere to this Code of Conduct as the foundation for the sustainability and success of our Maison.

Stephan Wolzok, Chairman

Table of Contents

Preamble - Principles and Regulations..... 2

Acting with *responsibility, solidarity and respect* 3

 Respecting and promoting human rights and fundamental freedoms 3

 Promoting a responsible approach with our partners and making it effective 3

Ensuring a respectful *work environment for everyone*..... 4

 Promoting diversity and banishing discrimination 4

 Ensuring safety and security 4

 Respecting privacy 4

 Fostering social dialog 5

 Maintaining the confidentiality and security of information..... 5

 Communicating responsibly on social media..... 5

Acting for the *climate*..... 6

Fostering integrity in *how business is conducted* 7

 Fighting against money laundering and the financing of terrorism 7

 Fighting against all forms of corruption 7

 Preventing and managing conflicts of interest 7

 Respecting competition and business ethics 8

 Adopting a reasonable approach to gifts, invitations and benefits in kind..... 8

 Using the resources of the Maison responsibly 8

 Intervening in the public sphere and supporting communities..... 8

 Ensuring the honesty of financial information..... 9

Implementation and *compliance with the Code of Conduct* 10

 Scope of application and dissemination 10

 Governance..... 10

 Tools 10

Preamble - *Principles and Regulations*

The principles that have guided our Code of Conduct and that must underpin our actions are:

- Acting with integrity and a sense of responsibility
- Complying with laws and regulations
- Respecting the dignity and rights of each individuals
- Ensuring confidentiality
- Using our resources in the best interest of the Maison and its stakeholders
- Protecting the climate

Our Code of Conduct is intended to comply with the following main reference texts:

International rules, standards and initiatives:

- The United Nations Universal Declaration on Human Rights and the European Convention on Human Rights;
- The United Nations Convention on the Rights of the Child;
- The various conventions of the International Labor Organization, in particular Conventions 29, 105, 138, 146, 182 (child labor and forced labor), 155 (safety and health of workers), 111 (discrimination), 100 (remuneration), 87 and 98 (freedom of association, right of organization and collective bargaining);

- OECD Guidelines;
- The 10 principles of the UN Global Compact and the associated Sustainable Development Goals (SDG);
- The United Nations Guiding Principles on Business and Human Rights (UNGPR);
- The UN Women's Empowerment Principles.

Industry standards and initiatives:

- The Kimberley Process Certification Scheme (KPCS);
- The World Diamond Council System of Warranties;
- The Responsible Jewelry Council Code of Practice.

In addition to our Code of Conduct, there are other documents that must be recognized and properly applied, including Maison policies and procedures. It is important that everyone is aware of these documents.

It is also important for everyone to be vigilant, ask for help if they do not know how to solve an ethical issue on their own, and finally report any problems or breaches of this Code of Conduct.

The Maison undertakes to prevent and punish any violation of the Code of Conduct and to take any corrective action where necessary.

Acting with *responsibility, solidarity and respect*

Respecting and promoting human rights and fundamental freedoms

The Maison is committed to carrying out its activities in a manner that respects the fundamental freedoms and rights of people and supports the continuous improvement of working conditions. It is committed to respecting and promoting human rights as prescribed in the Universal Declaration of Human Rights, the UN Global Compact and the UN Women's Empowerment Principles. In particular, the Maison will not tolerate any abusive form of child labor, any form of forced labor or inhuman treatment.

Promoting a responsible approach with our partners and making it effective

The Maison is committed to creating sustainable and responsible relationships with its partners to encourage best practices and raise awareness about industry issues. To this end, the Maison has put in place a Responsible Procurement Policy that is disseminated through a Supplier Code of Conduct. The Supplier Code of Conduct incorporates the principles underlying this Code of Conduct and our Responsible Supply Chain Policy. It reminds our suppliers of our social, environmental and business integrity and ethics requirements. We ask them to adhere to it.

Ensuring a respectful *work environment for everyone*

Promoting diversity and banishing discrimination

The Maison's employees reflect a broad range of cultures, origins and experiences, which we consider to be an asset. They are at the heart of the Maison's values and are the pillars of its growth. The Maison therefore encourages diversity and equal opportunities within its organization and does not tolerate any form of discrimination. This position is reflected in our recruitment policy. Employees are encouraged to express their concerns and ideas freely. The Maison promotes freedom of opinion, expression and association.

Ensuring safety and security

The Maison pays particular attention to the working environment of its employees to ensure the best operating conditions and to ensure compliance with laws and regulations.

To this end, the Maison guarantees its employees access to adequate health and safety information and appropriate personal protective equipment. It also undertakes not to expose its employees to prohibited substances which are recognized as dangerous to human health or the environment.

The Maison makes every effort to avoid any threats to its personnel inside or outside its premises.

Finally, the Maison will not tolerate any kind of harassment, intimidation, bullying, or humiliating behavior, whether psychological or sexual, or any abuse of power.

Respecting privacy

The Maison is careful to ensure a healthy balance between professional and private life for its employees. It respects the right of its employees to become involved, on a personal basis, in activities outside the workplace. In return, employees must ensure that these private activities do not involve or jeopardize the fulfillment of their responsibilities or damage the reputation of the Maison.

The Maison undertakes to comply with regulations when it collects, processes or transfers the personal data of its employees or applicants.

Fostering social dialog

The Maison respects the freedom of opinion and expression of its employees as it respects the right to freedom of association and the right to be a member of a trade union. It encourages social dialog and consultation with staff representatives in a continuous improvement approach.

Maintaining the confidentiality and security of information

In view of the sensitive nature of the diamond industry, the Maison encourages all of its employees to use discretion. For their own security and the security of the Maison, they must avoid talking about their activity and giving details about their workplace. Also, they must always practice confidentiality with regard to the identification of other employees, stakeholders, site access and financial factors.

Communicating responsibly on social media

Always remember that comments exchanged on social media are part of the public domain and remain permanent and accessible to a large audience if no particular vigilance is implemented.

The Maison encourages employees to act as its ambassadors and to convey its messages. When they do so, the Maison encourages discernment and respect for the guiding principles of this Code. The people who are empowered to represent the Maison and speak on its behalf are clearly identified.

Acting for the *climate*

The Maison is committed to Corporate Social Responsibility and strives to take initiatives to reduce the environmental impact of its activities and to promote responsible practices among its employees and partners to the greatest extent possible.

The Maison complies with environmental laws and regulations and makes its own contribution to preserving nature and the environment in which it operates.

The Maison undertakes to measure its direct impact in order to assess the effects of its actions and to share its results and actions in an annually updated report.

Fostering integrity in *how business is conducted*

Fighting against money laundering and the financing of terrorism

The Maison prohibits and condemns all practices of money laundering or terrorist financing. To this end, it employs a global system that complies with laws and regulations. It implements specific due diligence to gain better knowledge about its partners. To avoid any attempt at money laundering, terrorist financing, fraud or other illegal activities, no cash payment is accepted for diamonds.

Fighting against all forms of corruption

The Maison strictly prohibits corruption in all its forms (active, passive, bribery or facilitation payments) and will not tolerate any such behavior.

Employees who refuse to participate in any act of corruption will not suffer any form of punishment, even if their decision results in a loss of business for the Maison. Any employee who does participate in acts of corruption or influence peddling will be subject to disciplinary measures.

The Maison intends to prevent corruption by complying with applicable anti-corruption laws, such as the French Sapin II Law, and by raising awareness and training its employees on a regular basis.

Preventing and managing conflicts of interest

The employees of the Maison should not put themselves in positions where their interests, those of their family or relatives and those of the Maison would be in conflict, would give the appearance of being in conflict, or would be in a position that might alter their judgment, their objectivity or integrity.

Before undertaking a business transaction on behalf of the Maison involving a member of his or her family, or a close relative, and generally when an employee faces a risk of conflict of interest, he or she must inform his or her direct manager and the Compliance Officer immediately. He or she must also suspend any relationship that the Maison might have with the third party in question, until a solution has been found.

Respecting competition and business ethics

The Maison is committed to respecting the principles of freedom of enterprise and freedom of trade and industry.

The Maison will not seek to take advantage of its membership of professional organizations to obtain sensitive business data that would infringe on the freedoms described above.

The Maison undertakes to operate in strict compliance with the laws and regulations in force with regard to trade restrictions and international sanctions.

Adopting a reasonable approach to gifts, invitations and benefits in kind

The Maison's policy condemns the offer or acceptance of largess, inappropriate gifts, or the promising of gifts for the purpose of influencing commercial decision-making in any way.

Maison employees must ensure that any gift or invitation that is offered in a professional context is within a reasonable limit as defined in the Gifts Policy.

Any employee who does not comply with this policy is subject to disciplinary action.

Using the resources of the Maison responsibly

All Maison employees undertake to use the resources of the Maison in a responsible and reasonable manner to avoid any abuse, waste and, a fortiori, any use for illegal purposes.

Details on the use of intangible resources (IT and communication resources) are provided in the Maison's IT and Communication Resources Charter (ICRC).

Intervening in the public sphere and supporting communities

The Maison has committed to refraining from making contributions, payments or loans to political parties or organizations.

The Maison intends to participate in patronage activities under the conditions set out in our policy for donations, patronage and sponsorship. The Maison is very firm about never using such patronage to influence a decision or to obtain material, commercial or personal benefits.

Ensuring the honesty of financial information

The Maison must provide its stakeholders with honest and accurate financial information that truly reflects the transactions on its accounts. The Maison complies with current accounting and financial standards and regulations.

The Maison is committed to providing our shareholders with relevant, accurate, precise and trusted information on the business, performance, potential customers and strategy of the company.

Implementation and *compliance with the Code of Conduct*

Scope of application and dissemination

The Code of Conduct applies to Maison employees, our stakeholders and our ecosystem. It applies to all the employees of the Maison, and they are obliged to comply with it. It is always provided to all new employees and is available on our website at rubel-menasche.com.

Governance

Since 2021, a Compliance organization has been established under the guidance of the Compliance Officer. With the help of the Internal Audit Team and the management community, this organization guides all employees to ensure compliance with the laws and regulations in force.

Tools

Risk mapping: The Maison has prepared risk mapping to measure and qualify the Maison's exposure to risks as much as possible, and to prevent and remedy them. This mapping is periodically reviewed to take account of changes in the environment in which the Maison operates.

Training: The Maison has a continuing education program on health/safety, the regulatory framework and corruption, money laundering, terrorist financing, diversity, and non-discrimination.

Internal controls: The Maison updates and enriches its internal control system to ensure that the Code of Conduct, internal procedures and procedures at a financial level are correctly applied and that the accounts are not used to conceal acts of corruption, fraud or influence trafficking.

External audits: Because of its positioning at the heart of the diamond industry value chain, the Maison is subject to upstream (mining) and downstream (customer) audits, as well as sectoral and legal audits. These audits are in line with the internal steps taken by the Maison.

Disciplinary system: Non-compliance by employees with the rules laid down in this Code of Conduct, as well as additional documentation (Policies and Procedures) and the In-Maison Rules, may be considered a violation and therefore be punished.

Whistleblowing: Any employee who is concerned about the attitude to adopt or interpretation of the principles set out in this Code of Conduct or who is directly or indirectly confronted with breaches can and must contact his or her direct manager, the Compliance Officer or Human Resources. The Maison has provided an alert mechanism, called "SpeakUp", for reporting a crime or offense, a serious and clear violation of the

law or regulations in force, behavior or position contrary to the Maison’s Code of Conduct, a threat or serious damage to the general interest. It is available to all the Maison’s employees and stakeholders. It guarantees confidentiality as much as possible and according to the limits set by the French Data Protection Authority (CNIL). No sanctions or acts of repression will be tolerated with regard to people who have used the device in good faith (a “whistleblower”), even if the suspicions that led to the report prove to be wrong.

This Code of Conduct will be reviewed and revised annually.

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