

Responsible Procurement Policy

JUNE 2022

RUBEL  MIENASCHÉ

The Maison of Rubel & Méнасché strives to implement the most demanding quality standards and follows a continuous improvement approach to satisfy its customers as best as possible.

Over the years, we have developed partnerships that have allowed us to strengthen our supply chain and to address our industry's major issues together. We are now formalizing our responsible procurement policy to restate our commitment to working with our suppliers sustainably over the long term.

This policy is in line with our core values and principles as expressed in our Code of Conduct. It includes the regulatory requirements that we and our suppliers are subject to. We encourage our suppliers to go further and move from meeting requirements to applying good or even best practices, in a continuous improvement approach.

We firmly believe that this is the best means for us to work together to establish the conditions for sustainable and environmentally friendly growth.

Joey Lager, Director of Operations

Stephan Wolzok, Chair

The Maison undertakes to use its influence to avoid possible breaches by other parties. It shall immediately ~~cease any relationship~~ with suppliers for which there is a proven risk of the implementation or involvement in violations of this Responsible Procurement Policy or of procurement or association with third parties committing such violations.

Reminder of the fundamental principles that guided our Code of Conduct and this *Responsible Procurement Policy*

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

Respecting and promoting human rights and fundamental freedoms

The Maison and its partners are committed to respecting human rights in accordance with the Universal Declaration of Human Rights and the International Labor Organization Declaration on Fundamental Principles and Rights at Work.

The Maison and its partners will not accept, contribute, help or facilitate:

- torture or cruel, inhuman or degrading treatment,
- forced or compulsory labor,
- the worst forms of child labor,
- violations and breaches of human rights,
- war crimes, violations of international humanitarian law, crimes against humanity or genocide,
- discrimination.

Fostering integrity in how business is conducted

The Maison and its partners are committed to operating within the framework of applicable laws and regulations, respecting trade restrictions and international sanctions programs, as well as the resolutions of the United Nations and other regulatory bodies.

The Maison and its partners will not accept, contribute, help or facilitate:

- the financing of armed conflicts or support for illicit armed groups,
- any form of corruption, money laundering or terrorist financing.

The Maison and its partners are committed to supporting transparency in payments and efforts to eliminate money laundering.

Ensuring the *traceability and natural origin of our diamonds*

In accordance with the commitments made to its customers, the Maison prohibits the purchase of “conflict diamonds” from countries or regions that have not implemented the provisions of the Kimberley Process.

The Maison strictly adheres to all the principles of the World Diamond Council. As such, all invoices for the purchase or sale of polished or rough diamonds must show the memos in relation to the recommendations of the WDC System of Warranties.

Since the beginning of the year, in response to recent geopolitical changes, the Maison made a new commitment: it will not purchase polished stones, cut from rough diamonds originating from Russia and invoiced to the seller after March 8th 2022.

The laboratory-grown diamond trade is a legal activity, and the Maison cannot impose a business model on its suppliers. The Maison, for its part, is committed to providing only natural diamonds. It therefore reserves the right to sue any supplier who supplies the Maison with synthetic stones willfully if they are detected.

The Maison undertakes to sell only natural diamonds that have not undergone H.P.H.T. modification, purity modification, or any form of treatment.

Finally, the Maison is fully committed to addressing the issues of the traceability of stones. Now, more than ever, we need to know more about our diamonds, how they reached us, their authenticity, and what impacts they have had on the world. The demand for transparency and ethics is a priority for our Maison. We are taking this approach with our partners to have a constructive, pragmatic and robust system.

Implementing and ensuring compliance with this policy

This policy aims to disseminate best practices in sustainable development throughout the supply chain in line with our CSR Policy. The implementation and monitoring of this policy is therefore based on four complementary tools:

- The Supplier Code of Conduct

This Code imposes specific responsibilities on all our partners with regard to good corporate governance, human rights, working practices, environmental protection standards and the natural origin of the stones provided. It sets out this Policy and our Code of Conduct so that expectations are clearly stated and implemented upstream in the supply chain.

- The due diligence process

In addition to our Supplier Code of Conduct, the Maison has implemented a five-step risk-based due diligence process, in accordance with the OECD Guide. This due diligence is carried out for suppliers working with products from conflict zones and high risk areas, in accordance with COP2019 of the responsible Jewelry Council.

- The external whistleblowing system

The Maison has provided an alert system, called “SpeakUp”, for reporting a crime or offense, a serious and clear violation of the law or regulations in force, and behavior or a position contrary to the Maison’s Code of Conduct or its Responsible Procurement Policy, or a threat or serious damage to general interest. It is available to all the Maison’s employees and stakeholders. It guarantees confidentiality as much as possible and within 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.

- Continuous improvement

The Maison monitors the performance of our procurement practices through the regular measurement of appropriate indicators. We are making improvements to how we operate through the remediation of the risks identified during our risk mapping. Finally, we plan to periodically submit our tools and processes to an independent third party for audit.

The Maison also trains its employees on the provisions of the Kimberley Process.

This Responsible Procurement Policy will be reviewed and revised annually. It will be amended in the event of a change in procurement practices.

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