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JEAN BOULLE LUXURY

CODE OF CONDUCT

This Code of Conduct governs the commercial relations between JEAN BOULLE LUXURY and its clients.

General Commitment

As a participant and stakeholder in the diamond and luxury Industry, we recognise the importance of maintaining and enhancing the overall reputation and trust of the Industry and the importance of sustaining long-term consumer demand for diamond and gemstone luxury and meeting consumer expectations.

We acknowledge and are aware that JEAN BOULLE LUXURY is committed to and conducts its business operations in accordance with the highest ethical standards and the best industry practices that have been developed by the Industry.

We further acknowledge the company's commitment to fulfilling its responsibility in respect of human rights per the <u>Universal</u> <u>Declaration of Human Rights</u> and <u>ILO core</u> <u>conventions</u>.

We undertake to support JEAN BOULLE LUXURY to the best of our abilities in meeting these commitments and endeavors in maintaining such standards, practices, declarations, conventions and principles. Accordingly, we undertake to provide JEAN BOULLE LUXURY with all the

necessary documentation and information such as may be required by JEAN BOULLE LUXURY to fulfill its obligations.

Undertaking

In addition to the aforementioned general commitment, we specifically undertake the following:

- We are opposed to and do not engage in the condoning, facilitating, encouraging and supporting terrorism financing, illegal activity and/or money laundering and recognise that such practices are prohibited. Accordingly, we undertake to only conduct business with companies whose business we believe to be legal and whose funds we believe to come from lawful sources.
- We will comply with national and, where applicable, international legislation, regulations and conventions with respect to money laundering, terrorism financing, bribery, corruption, smuggling, embezzlement, fraud, racketeering, transfer pricing and tax evasion.
- We are committed to combatting the scourge of conflict diamonds, and accordingly have committed ourselves to comply with all the rules of the Kimberley Certification Scheme Process and the requirements of the World Diamond Council.
- We are opposed to and do not condone or engage in the use of child labour and human rights abuses and will adhere to national legislation in this regard. We observe applicable rules regarding minimum wage, working hours and compensation.

• We are committed to providing a proper working environment which promotes the dignity, welfare, health and safety of all our employees and we will not engage in any practices which intentionally or recklessly may cause them harm or damage.

Disclosure

JEAN BOULLE LUXURY places a premium on and is committed to consumer confidence and the interests of the consumer. All material facts and information about natural diamonds and gems, treated diamonds/gems, synthetics or simulants will be fully disclosed at all times in accordance with best industry practice. Such disclosure will take place whether or not specifically requested and regardless of the effect on the value of the product.