

## Responsible Supply Chain Policy

1. This policy confirms Gianna Jewellery Co., Ltd.'s commitment to integrating ethical, respect human rights, and avoid contributing to the finance of conflict and comply with all relevant UN sanctions, resolutions, and laws.

2. Gianna Jewellery Co., Ltd is a member of the Responsible Jewellery Council (RJC). As an RJC member, we commit to operating our business in accordance with the RJC Code of Practices standard. We commit to proving, through independent third-party verification, that we;

a. Respect human rights in accordance with the Universal Declaration of human rights, the International Labour Organization Declaration on Fundamental Principles and Rights at work;

b. Prohibit bribery and corruption, money laundering or finance of terrorism.

c. Support transparency of government payments and rights-compatible security forces in the extractive industry.

d. Do not provide direct or indirect support to illegal armed groups

e. Enable stakeholders to voice concerns about the jewelry supply chain; and

f. Are implementing the OECD five-step framework as a management process for risk-based due diligence for responsible supply chains of minerals from conflict affected and high-risk areas.

3. We are committing to use our influence to prevent abuses by others. If we find that the supplier is at risk of non-compliance with such requirements, We will request the Supplier to take measurement to improve compliance with such requirements in a timely manner with the remedy all impact. and if still found to be at such a high risk level, We may suspend business transactions until there is an improve to the reduced the risk. We will consider the details contained in grievance mechanisms that we received from stakeholders who have raised concerns to us

4. Regarding serious abuses associated with the extraction, collection, manufacture, transport, and trade of precious metals:

We will neither tolerate nor profit from, contribute to, assist, 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. Human rights violations and abuses; or

e. War crimes, violation of international humanitarian law, crime against humanity or genocide

5. We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are committing abuses described in paragraph 4 or are sourcing from, or linked to, any party committing these abuses.

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

We only buy or sell diamonds that are fully complied with the Kimberly Process Certification Scheme. We 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 mine sites, transportation routes, points where diamonds are traded and upstream actors in the supply chain or

b. Tax or extort money or diamonds at mine sites, along transportation routes or at points where gold and precious metals are collected, traded, or from intermediaries, export companies or international traders.

7. We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are sourcing from, or are linked to, any party providing direct or indirect support to non-state armed groups as described in paragraph 6.

8. 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, including law that guarantees human rights. We will not provide direct or indirect support to public or private security forces that commit abuses described in paragraph 4 or that act illegally as described in paragraph 6.

9. Regarding bribery and fraudulent misrepresentation of the origin of minerals and gold:

We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of precious metals, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, collection, trade, handling, transport, and export of precious metals.

10. Regarding money laundering:

We will support and contribute to efforts to eliminate money laundering where we identify a reasonable risk resulting from, or connected to, the extraction, trade, handling, transport or export of minerals and gold.