

## Responsible Jewellery Council Code of Conduct

Vernain SA is a family-run company specialising exclusively in the trade of cut diamonds. Vernain SA supplies companies in the fine jewellery and watchmaking sectors.

Vernain SA is based in Geneva and employs two people, who are also shareholders in the company.

Vernain SA obtained its first RJC certification under the 2019 Code of Practice (COP) in 2023 and successfully renewed its certification in 2026 under the RJC's new 2024 Code of Practice (COP).

The RJC is a standards-setting organisation established to promote ethical, responsible, social, environmental and human rights-respecting practices throughout the supply chain for gold, silver, platinum group metals, diamonds and coloured gemstones.

The RJC has developed a benchmark standard (the Code of Conduct or Code of Practice, COP) for the jewellery supply chain, as well as credible mechanisms to verify the adoption of responsible business practices through third-party audits.

The RJC Code of Conduct sets out the ethical and social responsibility standards that member companies must adhere to in order to ensure that their business practices respect human rights, the environment and ethical business practices.

The RJC Code of Conduct covers a wide range of areas, including:

- Human rights, including fair labour standards and respect for workers' rights
- Environmental compliance, including the responsible management of waste and chemicals
- Anti-corruption and ethical business practices
- Traceability and transparency in supply chains for precious metals and gemstones

This Code of Conduct is aligned with the requirements of the Responsible Jewellery Council's Code of Practices 2024 and forms part of an ongoing commitment to improving the company's responsible practices.

As part of its certification process with the Responsible Jewellery Council, Vernain SA is committed to, and expects its partners to adhere to and comply with, the following commitments

- Agree to adhere to Vernain SA's commitment and policies regarding ethical and responsible sourcing, and to comply with them in the course of their business activities
- Share information with Vernain SA in an honest, open, proactive and transparent manner.
- Regularly assess compliance with the code of conduct and identify any risks relating to human rights, labour rights, potential sources of conflict or potential breaches of ethical conduct.

- Where appropriate, put in place mechanisms to enable the confidential reporting of any concerns regarding unethical practices, without fear of reprisals.
- Implement the United Nations Guiding Principles on Human Rights, in particular:
  - Protect and respect human rights in all the company's activities.
  - Avoid causing or contributing to adverse human rights impacts through your activities, and manage such impacts when they occur.
- Comply with all laws and regulations applicable to your activities in your country.
- Adopt responsible business practices and do not tolerate corrupt practices, including fraud, bribery, facilitation payments, money laundering or the financing of terrorism, and put in place appropriate controls.
- The following conditions are met within your organisation and within the organisations that supply you:
  - No use of child labour.
  - No hazardous work.
  - No forced labour, trafficking or bonded labour.
  - No discrimination on the grounds of race, nationality, religion, age, disability, gender, marital status, sexual orientation, trade union membership or political affiliation.
  - No harassment at work, including, but not limited to, corporal punishment, harsh or degrading treatment, sexual or physical harassment.
  - No inhuman treatment.
  - Healthy and hygienic working conditions.
  - Employees are paid in accordance with national legislation and ILO (International Labour Organisation) conventions, and working hours comply with national legislation and collective agreements.
  - These principles also apply, as far as possible, to business partners and their own supply chains.
- To respect the environment by complying with all applicable laws and regulations, and to implement proportionate measures aimed at reducing the environmental impact of our activities.
- For all supplies of polished diamonds, Maison Vernain SA undertakes to:
  - Ensure that commercial transactions are transparent and accurately reflected in commercial records and documents.
  - Exercise due diligence in accordance with the OECD (Organisation for Economic Co-operation and Development).
  - Purchase from legitimate, conflict-free sources in compliance with United Nations resolutions.
  - Adhere to the Kimberley Process Certification Scheme (KPCS) and the World Diamond Council's system when sourcing diamonds.
  - Provide a comprehensive and accurate description of the physical characteristics of gemstones (weight, type of stone, treatment and country of origin where known) and supply any gemmological reports or other relevant documentation, in accordance with industry best practice. Include the origin where known or required by regulation.

- Implement due diligence measures to identify the origin of diamonds and, where required, provide documented assurances confirming their compliance with applicable international regulations, particularly regarding sanctions and trade restrictions (including non-Russian origin where applicable).
- Encourage their own suppliers and business partners to adopt practices that comply with the principles of this code of conduct.

Vernain SA reserves the right to assess its partners' compliance with this code of conduct and to take appropriate action in the event of non-compliance, which may include the termination of business relations.

*A. Vernain*

*D. Vernain*

