

# Complaint Management Procedure – COP 2024



VERNAIN SA  
March 2026

Vernain SA has established this complaint management procedure to allow employees, business partners and other stakeholders to express any concerns regarding the company's practices. This complaint mechanism is accessible to employees, business partners, suppliers, clients and other stakeholders likely to be affected by the activities of Vernain SA.

This procedure specifically addresses concerns related to:

- Circumstances in the supply chain
- Human rights
- Due diligence obligations for sourcing in conflict or high-risk zones
- Responsible business practices
- Workers' rights or working conditions

**Arthur Vernain** is responsible for the implementation and review of this procedure. Concerns or complaints may be addressed to Vernain SA by post, email or phone:

**VERNAIN SA**  
À l'attention de M. Arthur Vernain  
9 Rue de la Fontaine  
1204 Genève  
Phone # : +41 22 329 05 20  
Email : info@diamants.ch

All complaints will be treated confidentially to the extent possible. Vernain SA commits to ensuring that no person submitting a complaint in good faith will be subject to retaliation. Complaints may be submitted anonymously where possible.

Upon receipt of a complaint, Vernain SA will endeavour to:

- Obtain a precise account of the complaint;
- Explain the complaint management procedure to the complainant;
- Establish how the complainant wishes the complaint to be handled;
- Determine the appropriate person within the company to handle the complaint, or, if necessary, help redirect the complaint to another competent entity (for example, a supplier or sectoral organisation);
- Obtain additional information where necessary;
- Identify the appropriate measures to be taken and monitor the situation;
- Inform the complainant of the decisions and conclusions to the extent possible;
- Retain complaints received and the documentation relating to their handling in the company's records for a minimum period of five years.

This procedure is available to stakeholders upon request. Vernain SA reviews the complaints received in order to identify any improvements to be made to its procedures and responsible business practices.

Signed in Geneva, the 20<sup>th</sup> of March 2026



Effective date : 1st of June 2026