

GROUP POLICY / EXTERNAL

NIRU GROUP ETHICAL CHARTER FOR RESPONSIBLE SOURCING INCLUDING FROM CONFLICT-AFFECTED AND HIGH-RISK AREAS

DOCUMENT CODE

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POLICY OWNER

Office of Chief Operating Officer

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INTRODUCTION

Niru Group is committed to upholding the highest standards of ethical, social, and environmental responsibility within its operations and throughout its supply chain. The policies, procedures, and ethical guidelines that govern NIRU's responsible sourcing practices set a framework that aligns with the principles outlined in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

This framework integrates responsible practices across all levels of precious material procurement, reflecting the Niru Group's vision for a more socially and environmentally sustainable supply chain. It also demonstrates Niru's commitment to respecting internationally recognized human rights and to avoiding contributions to conflict or adverse environmental impacts when sourcing minerals, including from conflict-affected and high-risk areas.

The Group also reaffirms its strong commitment to upholding the Ten Principles of the United Nations Global Compact, of which it has been a signatory since 2023. Niru Group expects its members, business partners, and suppliers to strictly comply with all relevant United Nations sanctions, resolutions, and national laws related to responsible mineral sourcing.

This ethical charter applies to all Niru stakeholders and entities, which are expected to review it regularly and ensure alignment with its provisions.

ETHICAL CHAPTER

1. We, at Niru, as a certified member of the Responsible Jewelry Council (RJC) are committed to proving, through independent third-party verification, that we:
 - 1.1 Respect human rights according to the Universal Declaration of Human Rights and International Labor Organization Fundamental Rights at Work, including applicable legislation on disciplinary procedures. We reject and strongly condemn child labor, forced labor, undeclared or clandestine work, as well as human trafficking, and any form of discrimination, harassment, or violence at work. We will cease all relations with the stakeholders concerned in the event of a violation of these provisions.
 - 1.2 NIRU Group strictly prohibits all forms of child labor across its operations and at all stages of our supply chain. To this end, NIRU Group has established a Comprehensive Framework for the Prohibition of Child Labor, which reflects our zero-tolerance policy on this matter. In case of non-compliance with this framework, suppliers are required to implement immediate corrective actions, and serious violations may result in the suspension or termination of business relationships.
 - 1.3 Do not engage in or tolerate bribery, corruption, money laundering, or financing of terrorism.
 - 1.4 We are committed to supporting the transparency of government payments and of rights-respecting security practices within the extractive industry.
 - 1.5 We prioritize the security of people above the protection of property.
 - 1.6 We strongly reject and condemn any form of corruption and facilitation payments, regardless of the form they may take. We are committed to supporting employees who might be faced with such attempts of corruption.
 - 1.7 We enable stakeholders to express anonymously and without fear of reprisals their concerns related to the jewelry supply chain, including potential workplace mistreatment, human rights violations, or corruption. To this end, we have established a grievance procedure to address concerns related to circumstances in the supply chain involving diamonds and colored gemstones from conflict-affected and high-risk areas. Complaints can be submitted to the following address: **compliance@nirugroup.com**.
 - 1.8 We are implementing the OECD 5-Step framework as a management process for risk-based due diligence for responsible supply chains of minerals, including from conflict-affected and high-risk areas.
 - 1.9 We also commit to using our influence to prevent abuse by others.
 - 1.10 We are committed to respecting and promoting compliance with the Kimberley Process Certification Scheme for the purchase and sale of rough diamonds. We also implement the World Diamond Council's Industry System of Warranties Guidelines, and we supply exclusively conflict-free diamonds.

- 1.11 We adopt sustainable and responsible practices to manage and minimize our impact on the environment.
2. Regarding serious abuse associated with the extraction, transport, or trade of precious materials
We will neither tolerate nor profit from, contribute to, assist, or facilitate the commission of:
 - 2.1 Any form of torture, cruel, inhuman, and degrading treatment;
 - 2.2 Any form of forced or compulsory labor;
 - 2.3 The worst forms of child labor;
 - 2.4 Other gross human rights violations and abuse, such as widespread sexual violence; and
 - 2.5 War crimes, other serious violations of international humanitarian law, crimes against humanity or genocide.
3. We will terminate any relationship with upstream suppliers if we identify a risk that reasonably indicates that they are engaging in the abuses mentioned above, sourcing from, or are associated with third parties committing these abuses.
4. Regarding direct or indirect support to non-state armed groups:
We will not tolerate any direct or indirect support for non-state armed groups or their affiliates – including, but not limited to, procuring diamonds or gemstones from, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates who illegally:
 - 4.1 control mine sites, transportation routes, points where diamonds and colored gemstones are traded, and upstream actors in the supply chain; or
 - 4.2 tax or extort money or diamonds and colored gemstones at mine sites, along transportation routes, or at points where diamonds and colored gemstones are traded, or from intermediaries, export companies, or international traders.
5. 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 those referred to above.
6. Concerning public or private security forces:
We affirm that the role of public or private security forces is to ensure the security of workers, facilities, equipment, and property in accordance with the rule of law, including legislation that guarantees human rights. We will not provide any direct or indirect support to public or private security forces that commit the abuses described or that act unlawfully as described in the paragraphs above.
7. Regarding bribery and fraudulent misrepresentation of the origin of gold, diamonds and colored gemstones:
We will not offer, promise, give, or demand bribes, and will resist the solicitation of

bribes, conceal or disguise the origin of diamonds and colored gemstones, or misrepresent taxes, fees, and royalties paid to governments for extraction, trade, handling, transport, and export of diamonds.

8. 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 derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers.