



CHONG LERDLUM CO., LTD.

Supply Chain Policy

The Responsible Jewellery Council (RJC) is an international not-for-profit standards-setting and certification organization that has been established to Advance Responsible Ethical, Human Rights, Social and Environmental Practices throughout the Diamond, Colored Gemstones, Gold, Silver and Platinum Group Metals (PGM's) Jewelry Supply Chain that promote trust in the global fine jewellery. The RJC has developed a Benchmark Standard for the Jewellery Supply Chain and Credible Mechanisms for verifying Responsible Business Practices through Third Party Auditing.

1. Chong Lerdlum is a [BRIEF DESCRIPTION OF THE COMPANY]. This policy confirms Chong Lerdlum Co.,Ltd.'s commitment to respect human rights, avoid contributing to the finance of conflict and comply with all relevant UN sanctions, resolutions and laws.
2. In this regard, Chong Lerdlum Co., Ltd, is a certified member of the RJC standard, we are committed to operate our business in accordance with the RJC Code of Practices which is available at www.responsiblejewellery.com. The company committed and are independently audited against the RJC COP. As such, we commit to proving, through independent third-party verification, that we:
 - a. respect human rights according to the Universal Declaration of Human Rights and International Labour Organization Fundamental Rights at Work;
 - b. do not engage in or tolerate bribery, corruption, money laundering or finance of terrorism;
 - c. support transparency of government payments and rights-compatible security forces in the extractives industry;
 - d. do not provide direct or indirect support to illegal armed groups; and
 - e. enable stakeholders to voice concerns about the jewellery supply chain.
 - f. implementing the OECD 5-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 also commit to using our influence to prevent abuses by others.** If the company or any of its subsidiaries suspects an upstream Supplier to be in violation of these practices, we will issue a firm warning to the Stakeholder to alert and educate them of the violation(s). If following that warning, the suspected abuses are not corrected, we will STOP engaging with that upstream Supplier. If it is suspected by an internal member that any of our upstream Suppliers are sourcing materials from any Conflict-Affected and High Risk Areas (CAHRAs), they shall immediately alert the Highest-ranking Company Officer available. Their alert shall remain anonymous and will be investigated by upper Management. Each potential alert will be handled individually and will be thoroughly reviewed. Due diligence will be used to confirm or dismiss the alert presented to the company. Whether the alert is deemed to be in violation will be based on the discretion of the company, the outlined guidelines in this document and in addition to all guidelines set forth by RJC and Associated Partners.
4. **Regarding serious abuses associated with the extraction, transport, or trade of diamonds/coloured gemstones.** We will neither tolerate nor profit from, contribute to, assist or facilitate the commission of:
 - a. torture, cruel, inhuman 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, violations of international humanitarian law, crimes 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 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 sell or purchase diamonds/coloured gemstones that are fully compliant with the Kimberley Process Certification Scheme and, as such, will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring diamonds/coloured gemstones 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/coloured gemstones are traded and upstream actors in the supply chain; or
- b. tax or extort money or diamonds/coloured gemstones at mine sites, along transportation routes or at points where diamonds/coloured gemstones are 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.**

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.

9. **Regarding bribery and fraudulent misrepresentation of the origin of diamonds/coloured gemstones.** We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of diamonds/coloured gemstones, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of diamonds.

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 diamonds/coloured gemstones.

As a member of the Responsible Jewellery Council (RJC), Chong Lerdum Co., Ltd. is required to carry out Due Diligence on our Supply Chain to ensure that we source Diamonds, Colored Gemstones, Gold, Silver & PGM's responsibly, in a way that respects Human Rights and does not Contribute to Conflict.

As part of our Commitment to Responsible Sourcing, we are now working with our Suppliers to understand their Sources of Supply and Due Diligence Procedures for Managing Risks in their Supply Chain.

To fulfil our obligations, we ask that you share the following information with us on the following pages (where available):

1. The sources of Diamonds, Colored Gemstones, Gold, Silver and PGM's in aggregate that you supply to our Company. This is specifically the furthest upstream point in the Supply Chain the Diamonds, Colored Gemstones, Gold, Silver and PGM's can be identified as originating from e.g., Company, Mine or Specific Geographical Area of production.

2. List the percentage of Diamonds, Colored Gemstones, Gold, Silver and PGM's that you supply to us that fall into the following categories:

- a. Rough/Polished Diamonds, Colored Gemstones, Gold, Silver and PGM's from known large-scale Mining or Artisanal and Small-scale Mining Producers that provide information on the Original Source of Production (e.g., Company, Mine or Specific Geographical Area of production is known).
- b. Rough/Polished Diamonds, Colored Gemstones, Gold, Silver and PGM's from established Suppliers or Open Market where there is some, but limited information on the Original Source of Production (e.g., Country of Origin is known).
- c. Rough/Polished Diamonds, Colored Gemstones, Gold, Silver and PGM's from Established Suppliers or Open Market where there is no information available on the Original Source of Production.

3. Evidence that you have undertaken Due Diligence on the Source of Rough/Polished Diamonds, Colored Gemstones, Gold, Silver and PGM's supplied to our Company. This could include, for example, copies of any Supply Chain Risk Assessments, Reports or Audits you have done, copies of any Company Policies you have on Responsible Sourcing, Evidence of Participation in Responsible Sourcing Initiatives or Programs.

If you are not able to share such information for whatever reason, we will be happy to discuss this with you and find a solution that addresses your concerns and still satisfies our needs.

If you would like to learn more about Responsible Supply Chains or Minerals from Conflict Affected and High Risks Areas, please visit: www.oecd.org/fr/daf/inv/mne/mining.htm.

This letter Confirms that our suppliers should integrate the following Policies and Procedures into its Business Model to comply with the Code of Practices of the Responsible Jewelry Council as following;

Anti-Bribery & Facilitation Payments
Know Your Counterparty: Anti-Money Laundering and Finance of Terrorism
Adherence to the Kimberley Process and World Diamond Council System of Warranties
Diamonds to be Purchased from Responsible and Legitimate Sources.
Supply Chain Policy-OECD-CAHRAs
All Gold, Silver and PGM's used in jewelry is Responsibly Sourced and fully Traceable to its Origin.
Company policy with regards to synthetic diamonds and colored gemstones
Provenance Claim
Product Disclosure
Human Rights
Harassment, Discipline, Grievance Procedures
Employee Policies
Health & Safety Performance
Community Development
Environmental Performance
Relationship with Business Partners
Statement of Commitment to RJC Policies and Procedures

To fulfil our obligations, we have developed a KYC form which we send to all our counterparties (suppliers and customers) to collect relevant business information to identify risks as above. This is our credibility and evidence of our commitment to be responsible business practices in the jewellery supply chain.
If counterparties are considered high-risk for any reasons, we may;

- stop engaging if we find a reasonable risk that committing abuses or are sourcing from, or linked to, any party committing these abuses.
- stop engaging if we find a reasonable risk that sourcing from, or are linked to, any parties providing direct or indirect support to non-state armed groups.
- identify the beneficial owners of the counterparty and check whether the beneficial owners are on any watchlists or sanctions list.
- make an on-site visit to the high-risk counterparty.
- report suspicious activity to the authorities.

Moreover, we have established the grievance procedure to hear concerns about circumstances in the supply chain involving bribery, corruption, money laundering, the financing of terrorism and sourcing diamonds/ coloured gemstones or other precious metal from conflict-affected and high-risk areas. All information will be treated as confidential.



Signed:
(MR. TSUNG KUEI WEI)

Managing Director

Date: 28/02/2025