

ANNUAL RJC INTERNAL REVIEW OF COOKSON-CLAL

As part of our RJC certification, we hold an annual internal review of our management system, an extract of which is given below :

- Our **CSR-RJC Policy** is communicated to our stakeholders and is available on our website : <http://www.cookson-clal.com>
- An **RJC referent** is in place within our Society.
- A **KYC policy** (Know Your Counterpart) is in place within Cookson-CLAL. It gives details of our method of collecting and analysing the administrative and sourcing information we request from our stakeholders. We review it annually to ensure that it is as relevant as possible and in line with the international situation.

In 2023, we strengthened our government surveillance monitoring tool to improve our investigative effectiveness and ensure business relationships are not linked to individuals or companies involved in money laundering and fraud or participating in illicit and/or conflict-funding organisations.

- We carry out annual **due diligence** on our stakeholders according to the OECD's five-step framework for risk-based due diligence on the supply chain of minerals from conflict or high-risk areas. To do this, we question our suppliers to obtain the most reasonable assurance, based on their type, that they are not themselves sourcing the materials they deliver to us from conflict-related sources.

Our **due diligence method**, which has been strengthened in 2023, includes a flowchart for responding to identified risks. In this way, a **remediation process** could be used to deal with non compliant due diligence results, with the stakeholders.

- Our annual due diligence for 2023 highlighted the following points:
 - We have been particularly vigilant with our diamond suppliers, following the international sanctions on Russia.
 - We did not identify any clear « red flags » in relation to our precious metals supplies.
 - We have identified some « red flags » regarding gemstone supplies. The remediation process mentioned above has therefore been activated and we concluded to stop the relationship with one supplier and to set up a regular monitoring of the other suppliers concerned, who demonstrated transparency in their responses.
- We perform **human rights** due diligence within Cookson-CLAL, and for the stakeholders we engage with. In 2023, no alert has been identified.
- A mechanism for collecting and processing reports is available within Cookson-CLAL, to enable stakeholders to report, anonymously and without fear of reprisal, reports of possible mistreatment at work, human rights violations, corruption, or relating to the supply chain of the jewellery sector. To this end, we have set up an online form, accessible to everyone via our website, and our mechanism for collecting and processing reports, is available to everyone on request at the following address: rh@cookson-clal.com.
- Cookson-CLAL joined the RJC in August 2013. The next re-certification audit will take place at the end of May 2024.
- The **system KYC and due diligence is reviewed** annually, and communication will be made to inform stakeholders of any significant issues that the internal review may have highlighted.

Dardilly, May 14th 2024

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