

ANNUAL 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** has been communicated to our stakeholders and is available on our website : <http://www.cookson-clal.com>
- An **RJC referent** is in place within our Society.
- 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. In particular, 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.
- A remediation process has been put in place in order to deal with the stakeholder concerned with the results of a due diligence that does not meet expectations. Thus, our due diligence management plan provides a flowchart to react to identified risks.
- The highlights we have identified for this year are :
 - 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 are in discussion with the suppliers concerned to assess the level of risk and decide on the continuation of the business relationship. If we do not receive a satisfactory response within 3 months, we will be obliged to stop the relationship.
- A **KYC policy** (Know Your Counterpart) is in place within Cookson-CLAL. This includes the analysis of documents that we request from our suppliers. We review it annually to ensure that it is as relevant as possible and in line with changes in our environment. We have strengthened our monitoring of government surveillance sites, listing individuals or companies involved in money laundering and fraud activities or participating in illegal organisations and/or funding conflicts.
- We perform **human rights** due diligence within Cookson-CLAL, and for the stakeholders we engage with. We review this process annually. To date, no alerts have been identified.
- A **complaints system** is available within Cookson-CLAL, and we allow stakeholders to raise concerns anonymously and without fear of retribution about possible abuse in the workplace, human rights abuses, and corruption, or about the jewellery supply chain. To this end, we have established and maintain a complaints mechanism, which can be obtained at the following address: rh@cookson-clal.com.
- Cookson-CLAL joined the RJC in August 2013. The last recertification was on 15 July 2021.
- The **system is reviewed** annually, and communication will be made to inform stakeholders of any significant issues that the internal review may have highlighted.

Dardilly, March 10th 2023

Philippe Souquet

Managing Director – Cookson-CLAL

Cookson-CLAL

S.A. au capital de 7 413 696,12€

5, Chemin du Plateau - 69570 Dardilly

Tél. : 0800-878 202

RCS Lyon B 412 399 792