

## Code of Conduct & Ethics

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CLJ is a family-led Maison of jewellery committed to conducting business responsibly and ethically. CLJ's approach is rooted in principles of transparency integrity, honesty, and respect for human rights.

### **Application and dissemination of the Code of Conduct**

Compliance with laws and regulations, particularly in ethics, environmental, and social responsibility, is fundamental to CLJ's credibility and operations. This Code of Conduct applies to all CLJ employees and is distributed within CLJ, and provided to suppliers, partners, and employees prior to beginning new business relationships with external and internal stakeholders and employees. It is supplemented by CLJ's specific policies. The CEO & Leadership team at CLJ are responsible for promoting these commitments, and every executive, employee, and internal and external stakeholders, must consistently adhere to them. For guidance on interpreting the Code or addressing specific situations, please contact the CEO of CLJ ([info@camillelouis-jewellery.com](mailto:info@camillelouis-jewellery.com)). Non-compliance may result in disciplinary measures, including dismissal, depending on the seriousness of the breach.

This Code of Conduct (hereinafter "Code") establishes the foundational principles and values that guide CLJ's business activities and growth strategy. Inspired by the Universal Declaration of Human Rights (UDHR) and aligned with international standards such as the European Convention for the Protection of Human Rights and Fundamental Freedoms (ECHR), OECD standards, International Labour Organization (ILO) principles, and United Nations Guidelines for Business and Human Rights, this Code reflects CLJ's commitment to upholding the highest ethical standards in the industry.

### **Respecting Human Rights**

CLJ is dedicated to respecting human rights as outlined in the UDHR and the ILO Declaration on Fundamental Principles and Rights at Work. CLJ prioritizes fair labor practices, safe working conditions, and the elimination of discrimination in all aspects of its operations and supply chain. CLJ's goal is to proactively prevent and promptly address these impacts as needed.

**Compliance and Verification:** CLJ reserves the right to verify compliance with this Human Rights policy and conduct audits. Non-compliance may lead to corrective actions or termination of the business relationship.

**Training:** CLJ integrates this policy into internal procedures and provides training to ensure compliance throughout its operations.

**Responsibility for the Policy & Information Disclosure:** CLJ discloses progress on human rights compliance through reports and websites to promote transparency. Oversight is provided by the CEO & Leadership team. Employees are encouraged to report policy breaches through Grievance and Complaint procedures or directly to the CEO & Leadership team.



**Compliance & Reporting Requirements:** CLJ's Human Rights policies are regularly reviewed to ensure effectiveness and alignment with evolving legal standards. Updates are promptly implemented, and audits assess policy effectiveness. Breaches are reported to the CEO & Leadership team and included in annual reports on human rights.

By adhering to these measures, CLJ aims to effectively uphold human rights, maintain ethical standards, and safeguard its reputation as a responsible corporate entity.

### **Environmental protection & management of impact(Sustainability Statement & Report)**

CLJ is committed to environmental stewardship, aligning with the principles of the United Nations Global Compact and Sustainable Development Goals. CLJ contributes to SDGs 5, 9, 10, 12, 13, and 17 through its "Jewellery for the Global Goals" program. CLJ's approach aims to minimize environmental impact while maximizing positive measures to address climate change and preserve biodiversity. Utilizing technology tools integrated into our supply chain and e-commerce, CLJ continuously works to reduce our overall environmental footprint. We embrace circular and creative economy practices, including 3D, XR, and Digital Product Passport certified by blockchain, to enhance product sustainability and longevity. Through innovation, CLJ enhances client experience and sustainability by promoting upcycling, recycling, and embedding sustainability throughout our operations. Ensuring traceability and transparency in CLJ's supply chain is paramount, adhering to rigorous standards to guarantee responsible practices and uphold ethical sourcing principles.

By 2025, CLJ aims to reduce and manage the environmental impacts of its business operations through the implementation of an Environmental Management System (EMS), including:

- Responsible management of all wastes and emissions to air, water, and land.
- Establishing energy and water efficiency measures.
- Ensuring the responsible and efficient use of other natural resources, where applicable.

### **Supplier & Business Partner Code of Conduct (separate policy from Code of Conduct)**

CLJ highly values trust, transparency, and ethical business practices. It requires all suppliers and manufacturing partners (referred to as "suppliers") to adhere strictly to the standards outlined in this document. CLJ emphasizes a commitment to continuous improvement, reserving the right to terminate relationships with suppliers that fail to meet its expectations. However, CLJ also seeks to collaborate with suppliers demonstrating genuine efforts to enhance their adherence to this Code of Conduct over time. Non-compliance with CLJ's Supplier and Business Partner Code of Conduct may lead to corrective actions, suspension of purchasing, refusal of deliveries or return of goods, and potential termination of the business relationship. Partners or suppliers who become aware of violations or risks are encouraged to report concerns directly to CLJ's CEO & Leadership team, ensuring compliance with relevant laws and regulations.

### **Inclusivity, Diversity, Safety & Health**

At CLJ, the commitment is to foster an inclusive and diverse workplace where every individual is respected and valued. The safety and health of employees are prioritized, ensuring a supportive environment that upholds the highest standards of safety practices. The dedication extends to promoting diversity in all aspects of CLJ's operations, striving to create a workplace that embraces differences and fosters equal opportunities for all. CLJ supports Goal 5 and Goal 10 of the Sustainable Development Goals (SDGs) by prioritizing women's development, inclusion, and reducing inequalities within our workforce and communities. Through ongoing training, continuous improvement initiatives, and transparent communication, CLJ endeavors to maintain a culture that prioritizes inclusivity, diversity, safety, and health in all activities.



## **Fighting Bribery and Corruption**

CLJ strictly prohibits bribery and corruption in all business practices and transactions conducted by our employees and agents acting on our behalf. Bribery encompasses the giving, offering, or receiving of undue advantages to or from:

- Public or government officials
- Political candidates, parties, or officials
- Private sector employees, directors, officers, or their agents

## **Fighting Anti-Money Laundering, Financing of Terrorism & Application of Sanctions**

We are committed to preventing money laundering, financing of terrorism, and complying with international sanctions. CLJ has implemented robust Anti-Money Laundering (AML) and Know Your Counterparty (KYC) procedures to:

- Verify the identity of all counterparties
- Ensure counterparties and beneficial owners are not listed on government watchlists related to money laundering, fraud, or involvement with prohibited organizations
- Understand the nature and legitimacy of counterparties' businesses
- Monitor transactions for any suspicious or unusual activity

Compliance with international sanctions is crucial, and CLJ adheres strictly to laws and regulations on international sanctions and export controls.

Every transaction, regardless of size, is meticulously monitored to:

- Identify any direct or indirect connections to sanctioned countries or regions
- Verify that no entity, organization, or person involved is listed on international sanctions lists
- Ensure compliance with export control restrictions

## **Confidentiality Policy & Respect for Privacy**

CLJ is committed to maintaining the highest standards of confidentiality and respecting the privacy of all individuals and entities we interact with. Our policies and practices ensure that:

- All confidential information obtained in the course of business is handled with utmost care and discretion.
- Access to confidential information is restricted to authorized personnel on a need-to-know basis.
- Personal data of employees, customers, suppliers, and other stakeholders is collected, processed, and stored in compliance with applicable data protection laws and regulations.
- CLJ implements robust cybersecurity measures to protect sensitive information from unauthorized access, disclosure, alteration, or destruction.
- Employees are trained regularly on confidentiality protocols and data privacy best practices to uphold these standards across all operations.
- Any breach of confidentiality or privacy is promptly investigated, and appropriate measures are taken to mitigate risks and prevent recurrence.



**Compliance and Verification:** CLJ reserves the right to verify compliance with this Code and to conduct audits. Non-compliance may result in corrective measures or termination of the business relationship.

**Training:** CLJ integrates this policy into internal procedures and provides training to ensure compliance across operations.

**Responsibility for the Policy & Information Disclosure:** CLJ discloses progress on compliance efforts through reports and websites for transparency. The CEO & Leadership team oversee reporting. Employees are encouraged to report any policy breaches through Grievance and Complaints procedures or directly to the CEO & Leadership team.

**Compliance & Reporting Requirements:** CLJ's policies will be reviewed regularly to ensure effectiveness and compliance with evolving legal and regulatory requirements. Updates will be promptly implemented, and audits will assess policy effectiveness. Breaches of this policy are reported to the CEO & Leadership team and are part of the yearly company compliance management report, shared during the Annual General Assembly.

By adhering to these measures, CLJ aims to safeguard its business and reputation while upholding global standards of ethical conduct.

**Date of effect:** 30.09.2020 **Date of latest review:** 02.01.2024

**Signature:**



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CEO & Co-Founder Camille Louise Jewellery S.à.r.l

Aline d'Ambricourt

