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Conflict of Interest Policy

Purpose and Commitment: This policy confirms that this Conflict of Interest Policy is to uphold the integrity of CLJ's decision-making processes, promote transparency, and safeguard the trust placed in CLJ by its stakeholders. This policy ensures that any conflicts of interest are identified, disclosed, and appropriately managed or resolved.

Scope: This policy applies to all partners, suppliers, and directors of CLJ.

Policy Statement: At CLJ, partners and suppliers are expected to act in the best interests of the company and avoid situations where personal, financial, or other interests could conflict with their duties and responsibilities. A conflict of interest occurs when personal interests could potentially influence or appear to influence the impartial and objective performance of one's official duties.

Identifying Conflicts of Interest: Conflicts of interest may arise in various situations, including but not limited to:

- **Financial Interests:** Holding a significant financial interest in a competitor, supplier, or customer within the jewellery industry.
- **Outside Employment:** Engaging in employment or providing services to another organization that competes with or does business with CLJ.
- **Personal Relationships:** Having a close personal relationship with an individual in a decision-making position within a competing or partnering organization.
- **Gifts and Hospitality:** Accepting gifts, entertainment, or other benefits from individuals or organizations that do business or seek to do business with CLJ, beyond nominal value.
- **Procurement and Supplier Relations:** Influencing or being involved in the decision-making process for selecting suppliers or service providers with whom there is a personal or financial connection.

Disclosure and Management:

1. **Disclosure:**
    - Partners and suppliers must promptly disclose any actual or potential conflict of interest to their designated contact at CLJ.
    - Disclosures should be made in writing, detailing the nature of the conflict and any relevant information.

2. **Review and Resolution:**
    - Upon disclosure, the designated contact will review the situation to determine the nature and extent of the conflict.
    - If a conflict is identified, appropriate steps will be taken to manage or resolve the conflict. This may include:
        - Adjusting business arrangements or responsibilities to avoid conflict.
        - Seeking guidance from a third party to review or oversee the decision-making process where the conflict exists.

3. **Documentation:**

    - All disclosures and the actions taken to address conflicts of interest will be documented and maintained by CLJ.

Responsibilities:

1. **Partners and Suppliers:**

    - Be aware of and avoid situations that may lead to conflicts of interest.
    - Disclose any actual or potential conflicts of interest promptly.
    - Cooperate with efforts to manage or resolve conflicts.

2. **Designated Contact at CLJ:**

    - Ensure that partners and suppliers are aware of this policy and understand their responsibilities.
    - Review disclosed conflicts of interest and take appropriate actions to manage or resolve them.
    - Maintain records of disclosures and actions taken.

Compliance and Verification: CLJ reserves the right to verify compliance with this Conflict of Interest policy 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 Conflict of Interest 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:** 15.10.2026

Camille Louise Jewellery S.à.r.l