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Suppliers & Business Partner Code of Conduct

CLJ is a family-led Maison of jewellery which designs, creates and manufactures high-quality jewellery. CLJ is committed to adhering to all applicable laws, regulations, and international conventions, ensuring high standards in labor, social responsibility, environmental protection, and business ethics. We expect the same commitment from our suppliers.

This Supplier & Business Partner 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, and the United Nations Women's Empowerment Principles this Code reflects CLJ's commitment to upholding the highest ethical standards in the industry.

In case of non-compliance, CLJ may require corrective actions, suspend orders, refuse deliveries, return goods, and terminate relationships until compliance is achieved. These measures are in addition to any other legal rights available to CLJ.

Requirements:

Legal Compliance

Suppliers are required to adhere to all applicable laws and regulations in their operations, including those related to human and labor rights, anti-corruption, anti-money laundering, environmental management, child labor, forced labor, workplace health and safety, working hours, and remuneration. Any student or internship programs must comply with government laws and international regulations.

Prohibition Child and Forced Labor

Suppliers must not employ anyone under the age of 15, and must not engage anyone under 18 in hazardous work as defined by International Labour Organization (ILO) conventions. All forms of forced labor, including bonded labor, deceptive recruitment, human trafficking, and involuntary prison labor, are strictly prohibited.

Working Hours, Fair Remuneration, and Benefits

Suppliers must ensure employees do not work excessive hours, defined as more than 48 hours per week or 60 hours per week including overtime. Overtime must be voluntary. Employees must receive at least the legally mandated minimum wage and comply with all legal requirements for overtime and other benefits. Suppliers must adhere to all local laws and regulations regarding working hours and ensure that the total number of hours worked per week, including overtime, does not exceed legal limits. Employees are entitled to the minimum number of days off as per applicable laws.

Prohibition of Harassment, Sexual abuse and Discrimination

Suppliers must adopt a zero-tolerance policy for violence and harassment in the workplace. Discrimination on the basis of race, color, ethnicity, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, marital status, social background, parental or pregnancy status, physical appearance, HIV status, age, or any other characteristic unrelated to job performance is prohibited.

Respect for Employee Rights to Association and Collective Bargaining:

Employees have the freedom to join or form labor organizations without facing discrimination or reprisal. They are encouraged to voice their grievances and concerns to management openly and without fear of consequences.

Working Conditions, Health, and Safety

Suppliers must provide safe and healthy working conditions in compliance with applicable laws and relevant industry standards, including guidelines set forth by the International Labour Organization (ILO). This includes ensuring workplace safety measures, health protocols, and ergonomic considerations to mitigate hazards effectively and promote the well-being of all employees, while preserving cultural and historical heritage. By prioritizing these standards, CLJ aims to support Goal 10 of the Sustainable Development Goals, which promotes reduced inequalities and fair treatment for all workers.

Anti-Bribery and Anti-Money Laundering (AML) (See Policy AML & KYC)

Suppliers must not engage in any form of bribery or money laundering. Effective systems must be in place to ensure compliance by all employees and agents acting on behalf of the supplier.

Prohibition Bribery and Corruption

We prohibit bribery and corruption in all business practices and transactions carried out by employees and by agents acting on our behalf, with zero-tolerance. Bribery is defined as giving, offering, or receiving any undue advantage to or from:

- A public or government official;
- A political candidate, party, or official; or
- Any private sector employees, directors, or officers, or their agents or representatives.

Prevention of Conflicts of Interest

A conflict of interest occurs when an individual has a personal interest that could potentially influence their decisions. Such situations may involve familial relationships, partnerships, business partnerships, or investments. Suppliers are required to disclose any actual or potential conflicts of interest with CLJ's employees, internal and external partners.

Product Disclosure

Suppliers must provide truthful, accurate, and transparent information regarding jewelry materials and products supplied to CLJ. This includes detailed information on size, cut, carat weight, clarity, color, treatments, and origin of precious stones and metals. CLJ reserves the right to request additional information as necessary.

Diamond Warranty Statements

Suppliers must include the following warranty statements on all invoices for diamonds or diamond-containing jewelry products:

- "The diamonds and/or diamonds set in jewellery herein invoiced are of natural origin based on 100% testing of all diamonds supplied using appropriate diamond verification equipment. The seller agrees to provide evidence of test results upon request."
- "The diamonds and/or diamonds set in jewelry herein invoiced have been sourced from legitimate sources not involved in funding conflict, in compliance with United Nations Resolutions and applicable national laws. The seller guarantees these diamonds are conflict-free and adheres to the World Diamond Council (WDC) System of Warranties (SoW) Guidelines, and Diamonds from DeBeers Group “Tracr”

Coloured Gemstones & Gold:

Suppliers commit to ensuring that the sourcing of gemstones and precious-metals does not contribute to conflict. When acquiring gemstones from conflict-affected or high-risk regions, suppliers must prevent significant adverse impacts on human rights associated with their extraction, trade, handling, and export, aligning with OECD Guidance Annex II. Suppliers also pledge to comply with international sanctions relevant to gemstone trade. Furthermore, suppliers are required to provide detailed information on the physical attributes and processing methods of gemstones, in accordance with applicable laws and industry norms and are in no way linked to the financing of conflicts or derived from criminal activities.

Leather:

Suppliers commit to controlling and tracing raw materials to uphold best practices and comply with standards for animal welfare, environmental protection, and human health.

Environmental Responsibility & Performance

Suppliers must implement systems to identify and mitigate environmental impacts throughout their operations, aiming to improve environmental performance proactively. This includes minimizing their environmental impact across the product life cycle by conducting assessments, promoting recycling, reducing CO2 emissions, preventing air, water, and soil pollution, rigorously managing hazardous substances and waste in compliance with laws, promoting renewable energy use, optimizing water and energy consumption, and adhering to biodiversity protection regulations for raw material import and export.

Supply Chain Due Diligence and Transparency

Suppliers must conduct thorough due diligence on their supply chains to identify the geographical origin of jewelry materials and assess any human rights risks. Suppliers must share information about their business practices, due diligence outcomes, and material origins with CLJ upon request, while respecting commercial confidentiality.

Customs & Security Authorities

Suppliers must adhere strictly to all pertinent customs laws, particularly regulations governing imports and the prohibition of goods transshipment. Compliance with these laws is essential to ensure adherence to legal and ethical trade practices.

Data Protection

The Supplier confirms that it and its employees and representatives comply with all applicable data protection regulations. This includes adhering to principles such as legality, fairness, transparency, proportionality, data minimization, accuracy, security, and timely notification. The Supplier is responsible for maintaining robust data protection standards by implementing appropriate technical and operational security measures to mitigate risks such as damage, destruction, loss, unauthorized access, copying, theft, cyberattacks, and other related threats.

Fair Competition

The supplier shall comply with applicable competition and anti-trust laws.

Confidentiality

Suppliers acknowledge that during the course of their engagement with our organization, they may have access to confidential information. Suppliers agree to maintain the confidentiality of all proprietary and sensitive information disclosed by our organization and to use such information solely to fulfil their obligations under the agreement. Suppliers shall not disclose confidential information to any third party without prior written consent from our organization, except as required by law.

Transparency of Information

The Supplier is obligated to provide accurate, clear, and truthful information regarding their methods, resources, production locations, and product or service characteristics. Transparency plays a critical role in fostering trust and maintaining integrity across all business operations

Grievance mechanism

Supplier must implement mechanisms are established for workers and stakeholders to raise concerns securely, ensuring protection from retaliation or adverse repercussions.

Acknowledgment

I understand and commit to complying with the above requirements:

Day/Monthy/Year……

Supplier Name: Supplier Address:……

Supplier Representative Name and Position:……

Supplier Representative Signature:……