

PROCUREMENT / SUPPLY CHAIN POLICY  
SERTIS PRESTIGES SARL

1. SERTIS PRESTIGES is specialized in diamond setting and reparation in case of damage. This policy confirms SERTIS PRESTIGES' commitment to respect human rights, avoid contributing to the finance of conflict and comply with all relevant UN sanctions, resolutions and laws.

2. SERTIS PRESTIGES is a certified member of the Responsible Jewellery Council (RJC). As such, we commit to proving, through independent third-party verification, that we:

- a. respect human rights according to the Universal Declaration of Human Rights and International Labour Organization Fundamental Rights at Work;
- b. do not engage in or tolerate bribery, corruption, money laundering or finance of terrorism;
- c. support transparency of government payments and rights-compatible security forces in the extractives industry;
- d. do not provide direct or indirect support to illegal armed groups; and
- e. enable stakeholders to voice concerns about the jewellery supply chain.
- f. are implementing the OECD 5-Step framework as a management process for risk based due diligence for responsible supply chains of minerals from conflict-affected and high-risk areas.

3. We also commit to using **our influence to prevent abuses by others. In case of non-compliance by the supplier**, actions may include but not be limited to any of following:

- a. Require a supplier to implement behaviour change and confirm implementation in writing;
- b. Require a supplier to implement behaviour change and provide evidence of this – either in writing or via an on-site inspection;
- c. Require specific action to be taken by a supplier and evidenced by a specified date;
- d. Terminate a contract – timing to be in accordance with terms in contract, and access for buyer to an alternative, replacement supplier.

We commit to refraining from any action which contributes to the financing of conflict and we commit to comply with relevant UN sanctions resolutions or, where applicable domestic laws implementing such resolutions.

**4. Regarding serious abuses associated with the extraction, transport or trade of diamonds/coloured gemstones**

We will neither tolerate nor profit from, contribute to, assist or facilitate the commission of:

- a. torture, cruel, inhuman and degrading treatment;
- b. forced or compulsory labour;
- c. the worst forms of child labour;
- d. human rights violations and abuses; or
- e. war crimes, violations of international humanitarian law, crimes against humanity or genocide.

5. We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are committing abuses described in 4 or are sourcing from, or linked to, any party committing these abuses.

**6. Regarding direct or indirect support to non-state armed groups**

We only sell or purchase diamonds/coloured gemstones that are fully compliant with the Kimberley Process Certification Scheme and, as such, will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring diamonds/coloured gemstones from, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates who illegally:

- a. control mine sites, transportation routes, points where diamonds/coloured gemstones are traded and upstream actors in the supply chain; or
- b. tax or extort money or diamonds/coloured gemstones at mine sites, along transportation routes or at points where diamonds/coloured gemstones are traded, or from intermediaries, export companies or international traders.

7. We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are sourcing from, or are linked to, any party providing direct or indirect support to non-state armed groups as described in paragraph 6.

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**8. Regarding public or private security forces**

We affirm that the role of public or private security forces is to provide security to workers, facilities, equipment and property in accordance with the rule of law, including law that guarantees human rights. We will not provide direct or indirect support to public or private security forces that commit abuses described in paragraph 4 or that act illegally as described in paragraph 6.

**9. Regarding bribery and fraudulent misrepresentation of the origin of diamonds/coloured gemstones**

We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of diamonds/coloured gemstones, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of diamonds.

**10. Regarding money laundering**

We will support and contribute to efforts to eliminate money laundering where we identify a reasonable risk resulting from, or connected to, the extraction, trade, handling, transport or export of diamonds/coloured gemstones

**11. Grievance mechanism**

SERTIS PRESTIGES has established this complaints procedure to hear concerns about circumstances in the supply chain. Concerns can be raised by interested parties via email or telephone to:

KEVORK ABDEL NOUR  
+41 79 269 92 06  
[Kevork@sertisprestiges.ch](mailto:Kevork@sertisprestiges.ch)

On receiving a complaint, we will aim to:

- get an accurate report of the complaint;
- explain our complaints procedure;
- find out how the complainant would like it handled;
- where the issue can be handled internally, seek further information where possible and appropriate;
- identify any actions we should take, or monitor the situation;
- advise the complainant of any decisions or outcomes; and
- keep records on complaints received, and the internal process followed, for at least five years.

Signed/endorsed:



Kevork Abdel Nour

**SERTIS PRESTIGES sarl**  
6, Via Monnet  
1214 Vernier  
Tél: 022 555 33 99

Date of effect: 28 / 03 / 2023