## Maren Jewellery Supply Chain Policy

Maren Jewellery is aware of the risks and significant negative impacts that may be associated with the extraction, trade, handling and export of minerals from conflict and high risk areas.

We are committed to refraining from any action that contributes to the financing of conflict and we undertake to comply with relevant United Nations sanctions resolutions or, where applicable, national laws implementing these resolutions.

Maren Jewellery fully complies with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from conflict-affected and high-risk areas.

Due to the exclusive use of recycled minerals or lab-grown diamonds/gemstones, we exclude any sourcing from conflict-affected and high-risk areas -CAHRAs.

We recognise our responsibility to respect human rights and not contribute to conflict and therefore commit to the following principles on responsible sourcing of minerals from conflict and high risk areas.

These principles serve as a common basis for us and our suppliers. In addition to the principles, our Code of Conduct applies to our suppliers

Signed. Management: Helge Maren Hauptmann

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#### 01 Extraction, transport and trade of minerals

Maren Jewellery only sources recycled metals and lab-grown diamonds. As a matter of principle, we do not source minerals from conflict and high risk areas - CAHRAs. Materials and suppliers are screened to ensure that they do not contribute directly or indirectly (e.g. through participant financing / money laundering) to the following risks not tolerated by Maren Jewellery; any form of torture, cruel, inhuman and degrading treatment, all forms of forced or compulsory labour; the worst forms of child labour, other serious human rights violations and abuses such as widespread sexual violence and war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

#### 1.1 RISK MANAGEMENT OF SERIOUS VIOLATIONS

Cooperation with suppliers is immediately suspended or terminated if there is a reasonable risk that the minerals originate from or are associated with a party that commits serious abuses.

#### 02 Non-state armed groups

Maren Jewellery does not accept any direct or indirect support of non-state armed groups through the mining, transport, trade, handling or export of minerals.

This means no purchase of minerals, no payments to non-state armed groups and no logistical support or provision of equipment to non-state armed groups or their business partners. Maren Jewellery therefore does not tolerate illegal control of mine sites or transport routes, illegal control of trans-shipment points or suppliers in the supply chain, illegal taxation or extortion of money from intermediaries, such as at the entrances to the mining site, transport routes or other trans-shipment points for minerals.

### 2.1 RISK MANAGEMENT OF DIRECT OR INDIRECT SUPPORT TO NON-STATE ARMED GROUPS

Cooperation with suppliers will be immediately suspended or terminated if there is a reasonable risk that the minerals originate from or are associated with a party that directly or indirectly supports non-state armed groups.

#### 03 Public or private security forces

Maren Jewellery is committed to refraining from any direct or indirect support of public or private security forces that illegally control mine sites, tax or extort money, and control transport routes and upstream actors. We commit to and require, when we or any company in our supply chain contracts public or private security forces, that these security forces are used in accordance with the Voluntary Principles on Security and Human Rights, including ensuring the safety of miners, equipment and facilities.



#### 3.1 RISK MANAGEMENT OF PUBLIC OR PRIVATE SECURITY FORCES

If there is a reasonable risk that suppliers or other parties may provide direct or indirect support to public or private security forces, we will immediately develop and implement a risk management plan with the supplier and other parties. If this does not prevent the support of public or private security forces, we will terminate the cooperation with the suppliers.

#### 04 Bribery and fraudulent misrepresentation

Maren Jewellery will not offer, promise, give or demand bribes or resist requests to pay bribes to conceal or disguise the origin of minerals or to misrepresent taxes, fees and charges paid to governments for the trade, handling, transportation and export of minerals.

#### 4.1 RISK MANAGEMENT OF BRIBERY AND FRAUDULENT MISREPRESENTATION OF THE ORIGIN OF MINERALS

Maren Jewellery is committed to working with suppliers, central or local government authorities, international organisations, civil society and affected third parties to take and advance necessary mitigation steps through appropriate corporate actions. After failed attempts at mitigation, we will suspend or terminate cooperation with suppliers.

#### 05 Money laundering

At Maren Jewellery, we are committed to making every effort to assist in the effective combating of money laundering or to take appropriate action when we identify a risk of money laundering arising from or related to the extraction, trading, handling, transportation or export of minerals obtained through illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are obtained from upstream suppliers.

## 5.1 RISK MANAGEMENT OF MONEY LAUNDERING AND PAYMENT OF TAXES, FEES AND LEVIES TO GOVERNMENTS

Maren Jewellery is committed to working with suppliers, central or local government authorities, international organisations, civil society and affected third parties to take and advance necessary mitigation steps through appropriate corporate actions. After failed attempts at mitigation, we will suspend or terminate cooperation with suppliers.



#### 06 Diamond procurement

Maren Jewellery only sources lab grown diamonds and is committed to not sourcing conflict diamonds such as rough diamonds used to fund wars against governments. in accordance with the Kimberley Process, the WDC-SoW and under national legislation. We ensure that all diamonds sourced are in accordance with the universal principles of human rights, labour rights, anti-corruption and anti-money laundering.

### 6.1 RISK MANAGEMENT OF NON-COMPLIANCE WITH DIAMOND REGULATIONS

Maren Jewellery will immediately suspend or terminate cooperation with suppliers if there is a reasonable risk of non-compliance with the Kimberley Process, the WDC SoW and national legislation.

# 07 Risk management in case of non-compliance with environmental and sustainability regulations

Maren Jewellery requires its suppliers to respect and comply with national laws, international regulations and recommendations of non-governmental organisations on environmental protection and sustainable use of natural resources. In the event of violations in these areas, we will suspend or terminate our cooperation with these suppliers.

# 08 Identification and assessment of risks along the supply chain

Risks along the supply chain are reviewed in accordance with the current OECD Due Diligence Guidance, this Suply chain Policy and our Supplier Code of Conduct.

If risks/violations are identified, measures are taken to avoid or mitigate the risk. Depending on the risk assessment and the success of the measures taken, business relationships may be suspended or terminated.



#### 09 Contact

In the event of violations, questions or complaints, these are to be forwarded directly to the steering committee, i.e. the management. Complaints and violations must be documented in writing and must not result in any consequences or retaliation for the reporting person or other persons participating in the complaints procedure.

Contact person: Helge Maren Hauptmann helge@marenjewellery.com

Contact:

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