

Supply Chain Policy

At BIXLERS INC., we acknowledge the potential risks of substantial adverse consequences associated with the extraction, trade, handling, and export of minerals from areas impacted by conflict-affected and high-risk areas. Understanding our obligation to uphold human rights and refrain from contributing to conflict, we are committed to embrace, communicate extensively, and include within our contracts and agreements with suppliers the subsequent policy regarding responsible mineral sourcing from conflict-affected and high-risk areas.

1. As a member of Responsible Jewellery Council (RJC), we commit to proving, through independent third-party verification, that we:
 - a. respect human rights;
 - 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;
 - e. enable stakeholders to voice concerns about the jewellery supply chain; and
 - f. are implementing the OECD five-step framework as a management process of risk-based due diligence for responsible supply chains of minerals from conflict-affected and high-risk areas.

2. We are in the process of developing a list of CAHRAs, in alignment with the OECD Guidance. We take into consideration both areas in which the supplier company is located and in which the supplier company is sourcing from. We gather information from our suppliers about the origin of the jewellery materials that we handle (i.e., gold, silver, platinum group metals, diamonds, emeralds, sapphires and rubies) and determine if the identified origin(s) of jewellery material(s) is categorized as high-risk or low-risk ranking. We assign risk ratings to each indicator and aggregate them to determine an overall CAHRA risk rating for a specific country. We implemented a points system to assign risk ratings for each country. In cases where there is a high risk associated, the country will receive 0 points for that specific indicator. If there is a low risk, the country will receive 20 points for that specific indicator.

| Overall CAHRA Risk Rating | Total Score |
|---------------------------|--------------|
| High Risk | 0 - 20 pts |
| Medium Risk | 40 - 60 pts |
| Low Risk | 80 - 100 pts |

This scoring mechanism helps us assess and categorize the risk levels associated with each country more effectively.

3. We ask our suppliers to complete our KYC and ask them to provide accurate and up-to-date information about their business operations, ownership structure, and ethical practices. We verify the provided information through independent sources to ensure transparency and authenticity.

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4. We ask our suppliers to complete the supplier risk assessment report to help us make informed decisions about our suppliers and to minimize any potential risks. The risk assessment report consists of:
 - a. Anti-Money Laundering and Know Your Counterparty
 - b. Legal compliance and certifications
 - c. Human rights and labor practices
 - d. Workplace health and safety
 - e. Environmental management
 - f. Supply chain due diligence and responsible sourcing
 - i. Conflict affected and high-risk areas
 - ii. Undisclosed synthetic diamonds (if applicable)
5. Regarding serious abuses associated with the extraction, transport or trade of minerals, 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 labor;
 - c. the worst forms of child labor;
 - d. human rights violations and abuses; or
 - e. war crimes, violations of international humanitarian law, crimes against humanity or genocide.
6. We will stop engaging with any suppliers if we identify a reasonable risk that they are involved in abuses or have links to parties committing abuses.
7. We will only engage with suppliers that are fully compliant with the Kimberley Process standards and we will not tolerate direct or indirect support to non-state armed groups.
8. We will stop engaging with any suppliers if we identify a reasonable risk that they are sourcing from, or are linked to, any party providing direct or indirect support to non-state armed groups.
9. 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 or that act illegally.
10. We will not offer or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of minerals, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of minerals.
11. We will support the efforts to eliminate money laundering where we identify a reasonable risk resulting from, or connected to, the extraction, trade, handling, transport or export of minerals.