



ADLER SUPPLIERS CODE OF CONDUCT

2025

Introduction

Adler Joailliers SA is a fourth-generation family business that seeks to offer beautifully made and creative jewelry. Adler also seeks to develop warm and long-term relations with all its stakeholders, in Switzerland and everywhere else in the world, in short, to act "with heart, with style." In 2021, we decided to formalize the family's longstanding ethical vision by engaging in the Responsible Jewellery Council certification process and stating our long-term commitment to contribute positively to the world. We also updated our values charter (available on request) and started explaining its importance to stakeholders.

In the process of being certified, we have implemented a KYC (Know Your Counterparty) process to know who we do business with as well as the OECD's five-step framework for the exercise of a risk-assessment based due diligence for metals and stones from conflict or high-risk areas.

We have also produced this Supplier Code of Conduct which supports our commitment to promote ethical business practices in our industry and which we will ask you to sign and adhere to. It contains the norms we commit to follow, to be verified by independent third-parties.

A. General Requirements

1. Comply with applicable laws and regulations.
2. Incorporate ethical standards in business decisions.
3. Shun corrupt practices, including extortion, fraud, and bribery.
4. Not engage in money laundering or the financing of terrorism
5. Truthfully disclose the characteristics of products and health and safety information
6. Provide information on country of origin and sources of components and raw materials and product disclosure in accordance with domestic and international requirements.
7. Ensure the physical integrity and security of employees and valuables.
8. Protect the rights of workers.

B. Supply Chain Norms

1. Adhere to the Kimberley Process Certification Scheme (KPCS) and the World Diamond Council voluntary system of warranties.
2. Ensure that diamonds and other gemstones provided to Adler are not synthetic.
3. Comply with applicable conventions and regulations, including the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).
4. Support the development of communities involved in the supply chain where possible.
5. 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 gold, silver, precious metals of the Platinum mine, diamonds and precious stones.

6. Do not promise, give or demand bribes, and resist the solicitation of bribes, to conceal or disguise the origin of gold, silver, precious metals of the Platinum mine, diamonds and precious stones, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of gold, silver, precious metals of the Platinum mine, diamonds and precious stones.
7. Ensure that the gold and/or platinum titles correspond to the expected norms (18kt for gold, 950/1000 for platinum) or clearly mention it when those norms are not adhered to.
8. Take steps to assure that gold and/or platinum group metals supplied to Adler – from all sources – meet international standards for responsible business practices and are conflict-free.
9. Do not tolerate direct or indirect support to non-state armed groups or their affiliates — including through the supply of gold, diamonds or precious stones, the payment of money or the provision of logistical, material or other assistance — unlawfully engaged in the following activities:
 - a. Unlawful control of mining sites or transport routes, points of trade minerals and upstream actors in the supply chain.
 - b. Illegal taxation or extortion of gold silver of diamonds or precious stones on mining sites, transport routes or trading points of gold, silver and precious metals of the Platinum mine, diamonds or precious stones, or against intermediaries, exporting companies or international traders.

C. Human Resources Practices and Human Rights Norms

1. Respect fundamental Human Rights, as according to the United Nations Guiding Principles on Business and Human Rights.
2. Commit to high standards of health and safety.
3. Ensure that employees are paid, in line with industry standards and applicable legal minimum wage laws and/or collective agreements.
4. Prohibit discrimination on any basis.
5. Do not tolerate, assist or facilitate in any way the commission of the following acts, nor profit from or contribute to them:
 - torture or cruel, inhuman and degrading treatment, corporal punishments, harassment, coercion, abuse or intimidation,
 - forced or compulsory labour;
 - the worst forms of child labour;
 - violations of human rights; war crimes, crimes against humanity, genocides, terrorism, or other gross violations of international humanitarian law, crimes against humanity or genocide.
6. Do not tolerate and or provide a direct or indirect support to public or private security forces that commit abuses or that act illegally as described in the above paragraphs. 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.

D. Environmental Norms

1. Seek to conduct business in an environmentally responsible manner, ensuring compliance with relevant legal requirements, environmental norms and specific industrial environmental regulations.
2. Ensure compliance of air emissions from operations with relevant legal requirements.
3. Meet legal requirements relating to the use of hazardous substances.
4. Ensure compliance of safe handling, storing, and transportation of waste.
5. Commit to using responsibly sourced paper, packaging and other timber-based products
6. Ensure that fragrance compounds, formulae and packaging components are safe and comply with applicable laws.
7. Seek to understand energy consumption and take steps to reduce CO₂ emissions.
8. Protect biodiversity and sensitive habitats.

E. Sustainable product development

Suppliers are encouraged to factor in relevant environmental and social considerations into the lifecycle of their processes, technologies, products and packaging in order to include the environmental performance of their products through the product lifecycle and use opportunities for positive social impact. When feasible, the materials used for storage and transportation should be recyclable, renewable and reusable.

F. Change management and compliance

We expect suppliers to communicate these norms to their employees, sub-contractors and relevant third parties with whom they do business to ensure they can become integrated into their operations.

We also encourage our suppliers, when feasible, to invest in appropriate management systems and business processes and support continuing improvements in their business practices as well as to join the RJC or another standard-setter in responsible business practices.

While we seek to work collaboratively with our suppliers towards continuous improvement in responsible business practices, we will stop engaging with upstream suppliers if we find a reasonable risk that they are committing abuses described above or are sourcing from, or linked to, any party committing these abuses.

G. Complaint and Grievance mechanism:

We allow stakeholders to express anonymously and without fear of reprisals any concerns regarding possible ill-treatment at work, violations of human rights, as well as corruption, or issues related to the jewelry supply chain. To this end, a complaints mechanism has been put in place and is available. It can be obtained upon request from the following address: whistleblowing@adler.ch or by phone **+41 22 819 80 17**.

I understand and I have read the Adler Joailliers SA Supplier Code of Conduct

Compagny Name / Legal Entity

Place

Date

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Signature