

NIESSING

SUPPLY CHAIN POLICY

1. The Niessing Manufaktur GmbH & Co. KG is a jewelry manufacturer and brand. This guideline confirms Niessing Manufaktur GmbH & Co. KG to respect human rights, to avoid contributions to the financing of conflicts and to comply with all relevant UN sanctions, resolutions and laws.
2. The Niessing Manufaktur GmbH & Co. KG is a member of the Responsible Jewellery Council (RJC). As such, we are committed to proving through independent third-party verification that we:
 - a. respect human rights in accordance with the Universal Declaration of Human Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work (see COP 6);
 - b. do not engage in or condone bribery, corruption, money laundering or the financing of terrorism (see COP 12);
 - c. support transparency of government payments and lawful security forces in the extractive industries;
 - d. not provide direct or indirect support to illegal armed groups (see COP 29);
 - e. allow stakeholders to voice their concerns about the jewelry supply chain; and
 - f. to implement the OECD's Five-Step Framework as a management process for a risk-based due diligence for responsible supply chains of minerals from conflictual and high-risk areas (see COP 7).

This process will be led by the Company's Chief Executive Officer, who will provide the necessary resources and manpower to establish sustainable management systems that will enable the Company to implement the OECD framework in a timeframe consistent with the RJC timelines foreseen for the COP7 standard.

3. We are committed to using our influence to prevent abuses by others. We will inform our suppliers in a structured manner about the existing guidelines and will



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draw their attention in particular to Articles 5 and 7 of these guidelines, which may mean the direct termination of our business relationship with them.

We will also inform our customers about our policy and ask them to be vigilant and report any possible abuse they may encounter in the supply chain if we are affected.

4. In relation to serious abuses in connection with the extraction, transportation or trade of minerals: we will not tolerate, benefit from, contribute to or facilitate the commission of any such activity:
 - a. Torture, cruel, inhuman and degrading treatment;
 - b. Forced or compulsory labour (see COP 20);
 - c. the worst forms of child labor (see COP 19);
 - d. human rights violations and abuses (see COP 6); or
 - e. War crimes, violations of international humanitarian law, crimes against humanity or genocide (see COP 29)
5. We will immediately cease working with suppliers if we see a reasonable suspicion that they will commit the abuses described in paragraph 4 or obtain from or be associated with a party committing such abuses.
6. With respect to direct or indirect support to non-state armed groups: We will only buy or sell products that are fully compliant with the Kimberley Process Certification Scheme, and therefore will not tolerate direct or indirect support to non-state armed groups, including but not limited to procurement of diamonds from non-state armed groups or their affiliates, that act illegally, make payments to, or otherwise assist or supply diamonds to such groups, and that do not engage in any other illegal activity:
 - a. control mines, transportation routes, diamond trading locations and upstream actors in the supply chain; or
 - b. Tax or extort money or diamonds at mine sites, along transportation routes or at diamond trading locations, or from middlemen, exporters or international traders.



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7. We will immediately cease to work with upstream suppliers if we determine that there is a reasonable suspicion that they are sourcing from or are affiliated with a party that directly or indirectly supports non-state armed groups as described in paragraph 6.
8. With regard to public or private security forces: We reaffirm that the role of public or private security forces is to ensure the safety of workers, facilities, equipment and property in accordance with the rule of law, including laws guaranteeing human rights. We will not provide direct or indirect assistance to public or private security forces that commit the abuses described in paragraph 4 or act unlawfully as described in paragraph 6.
9. With respect to bribery and fraudulent misrepresentation of the origin of minerals: We will not offer, promise, give or solicit bribes or resist solicitations to hide or disguise the origin of minerals or to misrepresent taxes, fees and royalties paid to governments for the purpose of extracting, trading, handling, transporting or exporting minerals.
10. With respect to money laundering: We will support efforts to eliminate money laundering and will contribute to the elimination of money laundering if we identify a reasonable risk arising from or related to the extraction, trade, handling, transportation or export of minerals.

Addendum: Supply chain procedures.

Vreden, September, 01 2020



Sandro Erl
CEO



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ADDENDUM TO THE SUPPLY CHAIN DIRECTIVE

Niessing Manufacture GmbH & Co. KG regards its obligations to COP 7 as a process that must be continuously monitored over a longer period of time in order to achieve the best possible results that correspond to the company's position and size in the supply chain.

The latter implies that information about the supply chains - especially about the first direct suppliers that Niessing Manufaktur GmbH & Co. KG - depends to a large extent on the voluntary cooperation of the suppliers. Given the confidential nature of much of the information required from suppliers, possible resistance to full disclosure of information is to be expected and this must be included in the process.

As one of the very first companies to strive for RJC certification in accordance with the new Code of Conduct 2019, Niessing Manufaktur GmbH & Co. KG may have to assume a pioneering role in the implementation of COP7. We will make every effort to document the process to the best of our knowledge and belief and to communicate progress whenever appropriate.

PROCEDURE

In order to achieve full compliance with COP7 of the RJC, the following procedures are used:

1. Niessing Manufaktur GmbH & Co. KG will send a letter to all existing suppliers during 2020 informing them of the company's "Supply Chain Policy" in accordance with COP7. The letter is a clear request for cooperation in order to fulfill Niessing Manufaktur GmbH & Co. KG.
2. The letter will contain the following 2 appendices:
 - The company's supply chain policy
 - Company information form for suppliers

Suppliers are asked to fill out and return the information form, dated Niessing Manufaktur GmbH & Co. KG.

3. If necessary, the company will make a personal call to check whether the requirements are clear and to see how we can help the suppliers.



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In any case, Niessing Manufaktur GmbH & Co. KG will make every effort to receive a clear and timely response from its suppliers within a period of 6 months after sending the guideline and the information request form.

4. Upon receipt of the information request form(s), Niessing Manufaktur GmbH & Co. KG analyzes the results and determines whether there are problems in the supply chain and takes appropriate measures, especially if a "red flag" situation could arise.
5. For new suppliers, Niessing Manufaktur GmbH & Co. KG will perform steps 1 to 4 at the beginning of the relationship and monitor the results as part of the global process.
6. Niessing Manufaktur GmbH & Co. KG will keep records of each supplier in relation to COP7 and regularly check whether the suppliers continually meet the requirements.
7. In contact with its customers, Niessing Manufaktur GmbH & Co. KG will also inform them about its Supply Chain Policy and the customer's opportunity to voice questions and complaints on this subject. A complaints mechanism and form has already been installed and will be reviewed annually.

Vreden, September, 01 2020



Sandro Erl
CEO



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