

RICHOLD SA - Business Partner Compliance Form

RICHOLD SA fully complies with the following four specific criteria. In this respect, we require all companies with which we do business to comply with these obligations as well. As a result, RICHOLD SA voluntarily adheres to the highest ethical accreditation standards in the industry and conducts business only with partners certified by the Responsible Jewellery Council (RJC).

Furthermore, RICHOLD SA requires that diamonds sold to the Company are sourced exclusively from legitimate sources that are not involved in the financing of conflict, in compliance with relevant United Nations resolutions. RICHOLD SA requires that such diamonds do not originate from conflict zones and that suppliers comply with the System of Warranties established by the World Diamond Council. These requirements are supported by our due diligence process and by written assurances obtained from our suppliers. In addition, RICHOLD SA requires confirmation that diamonds purchased are not obtained in violation of applicable national laws or sanctions administered by the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC).

This certification remains valid for 12 months from signature date unless revoked or replaced earlier. This certification must be read together with the RICHOLD SA Supplier & Business Partner Code of Conduct and Traceability & Due Diligence Questionnaire (only for suppliers).

Criteria 1: Conflict Free Diamonds

RICHOLD SA forbid itself and its business partners to trade in conflict diamonds. This process acts as a chain of warranty and ethics that follows rough and polished diamonds through RICHOLD SA supply chain. As such, RICHOLD SA requires each of its suppliers to guarantee that the diamonds supplied to RICHOLD SA comply with the following criteria.

Please guarantee that the diamonds you supply are conflict free by (1) signing this section (2) incorporating the following warranty **into each invoice submitted to RICHOLD SA.**

“Diamonds specified in this invoice have been procured from legitimate sources, which have not been involved in the financing of conflicts, in compliance with the United Nations resolutions. We hereby guarantee that the diamonds do not originate from conflict zones and confirm that we have followed the guidelines of the System of Warranties issued by the World Diamond Council. This guarantee is based on our knowledge and/or written guarantees received from the supplier(s) of diamonds. Based on written assurance from our suppliers, we state that the diamonds herein invoiced have not been obtained in violation of applicable national laws and/or sanctions by the U.S. Department of Treasury's office of Foreign Assets Control (OFAC).”

We, _____, certify that the diamonds we supply are from a conflict-free zone. The undersigned certifies that he/she is duly authorized to sign this certification on behalf of the company.

Printed Name: _____

Date: _____

Title: _____

Signature:

Criteria 2: Rough Traceability

In order to secure our supply chain and to fulfil the obligation of transparency, we demand e each of our business partners to provide us **with the origin and provenance of the rough diamonds** supplied to RICHOLD SA. This may include the mine origin when available, the mining company identification and supporting documentation (Kimberley Parent's Certificate).

Please include the following statement **on each invoice or memorandum** sent to RICHOLD SA.

“The diamonds supplied originate from the following rough sources: please state your rough sources as country, e.g: Botswana, South Africa, Canada and a mining producer e.g: De Beers, Burgundy, Rio Tinto, Petra, etc “

We, _____, will provide RICHOLD SA with each stone's origin for traceability and ethic purposes. The undersigned certifies that he/she is duly authorized to sign this certification on behalf of the company.

Printed Name: _____

Date: _____

Title: _____

Signature:

Criteria 3: Diamond origin restrictions

RICHOLD SA does not purchase any rough or polished diamonds originating from the Marange & Mbada Diamond Fields in Zimbabwe, nor from Russian origin and requires its suppliers to certify that no diamonds submitted or sold to RICHOLD SA originate from those regions or countries.

In addition, diamond suppliers must include the following statement **on every invoice or memorandum** submitted to RICHOLD SA.

“Based on written assurance from our suppliers, we state that diamonds herein invoiced:

- have not originated from the Mbada and Marange regions of Zimbabwe, and;***
- have not transited in the Federation of Russia, and/or have not been cut from or in any way derived from rough and/or polished diamonds of Russian Federation origin, in compliance with all applicable sanctions laws and regulations, including but not limited to Swiss, EU, UK, and U.S. sanctions requirements..”***

We, _____, certify that the diamonds we supply do not originate from Marange & Mbada Diamond Fields in Zimbabwe, nor from Russian origin. The undersigned certifies that he/she is duly authorized to sign this certification on behalf of the company.

Printed Name: _____

Date: _____

Title: _____

Signature:

Criteria 4: Synthetic Diamonds

RICHOLD SA does not purchase or trade in synthetic diamonds. Consequently, we take every measure possible to ensure synthetic diamonds do not enter our supply chain. However, we also demand our business partners to take following active measures to ensure that no synthetic diamonds enter our supply chain or inventory:

- all our suppliers have to ensure the origin and provenance of all and every stone either produced in house, subcontracted, or purchased in the market
- Operate the latest system technology to test/detect synthetic diamonds by using such as AMS2, M-Screen, Synthdetect, Sherlock, or other equivalent technology, or by using certified and recognized external laboratories.
- Screen 100% of round diamonds successfully using industry-recognized synthetic diamond detection technology (for instance M-Screen & AMS2 machines) for sizes 0.90mm up to 3.80mm. All stones smaller than 0.90mm are sent to the De Beers Institute of Diamonds for screening. All larger stones are provided with GIA certification.
- Screen 100% of fancy shape diamonds successfully using industry-recognized synthetic diamond detection technology (for instance Synthdetect and Sherlock machines). For larger stones a GIA certification has to be provided.

Then the following descriptions should be applied on your invoices for standard disclosure of polished natural (melee) diamonds with colourless diamonds, the following inscription must be shown:

"The diamonds listed in this invoice/delivery note are exclusively of natural origin and have not undergone treatment of any kind. In order to guarantee their natural origin, 100% of these diamonds have been controlled for this criterion."

We, _____, certify that the diamonds we supply have been verified with high technology 100% to be exclusively of natural origin. The undersigned certifies that he/she is duly authorized to sign this certification on behalf of the company.

Printed Name: _____

Date: _____

Title: _____

Signature: