

SUPPLIER CODE OF CONDUCT FOR ALFION SA

1. Introduction

At Alfion SA, we are committed to responsible and ethical business practices throughout our supply chain. We expect our suppliers to share this commitment and to uphold the highest standards of integrity, human rights, labor practices, environmental stewardship, and compliance with applicable laws. This Supplier Code of Conduct defines our expectations for our suppliers. We are dedicated to upholding these standards and expect our suppliers to demonstrate the same commitment.

2. Ethical Business Practices

Suppliers shall conduct their business ethically and transparently, ensuring:

- **No Bribery and Corruption** Suppliers must comply with all laws and regulations that are relevant to avoiding bribery and corruption in all countries in which they operate. No involvement or implication in any act of corruption for either their own benefit or that which could compromise the making of objective and fair business decisions is tolerated.
- **No Money Laundering** Alfion SA does not tolerate money laundering or the finance of terrorism. Know Your Counterparts (KYC) procedures must be implemented to ensure that business associates and customers are not involved in any form of criminal activity.
- **Fair Competition** We support the promotion of free and fair competition around the world. As a result, suppliers must strictly comply with antitrust laws and ensure they do not engage in activities that would lead to the allegation of anti-competitive behavior.

3. Human Rights and Labor Practices

Suppliers must respect and promote human rights and fair labor practices, including:

- a. **No Child Labor** The employment of anyone under the age of 18, or under the age of 15 in countries where the minimum age for work is 15, is prohibited. Young workers between the ages of 15 and 18 must not be subjected to hazardous working conditions and must be given access to education.
- b. **No Forced Labor** All forms of forced or compulsory labor, including prison labor, or bonded labor, must be eliminated. All work must be voluntary, and workers must have the freedom to leave their employment at any time.

- c. **Fair Wages and Non-Discrimination** All workers are paid fair wages and provided with benefits in accordance with local laws and regulations. The supplier must not engage in any practices that deprive workers of their entitlements or that discriminate against any individual based on gender, race, religion, or other personal characteristics.
- d. **Freedom of Association** The right of workers to join trade unions and engage in collective bargaining is recognized and respected. The workers' right to organize or participate in collective bargaining is respected, and the supplier provides a forum for dialogue and dispute resolution.
- e. **Safe Working Conditions** A safe and healthy work environment, the prevention of workplace hazards, and access to clean water, sanitation, and adequate rest are provided to all workers. All necessary measures to prevent accidents and injuries, and to protect the health and well-being of our workers must be taken.
- f. **Respect from Human Dignity** All workers must be treated with respect and dignity, and no form of discrimination, harassment or abuse will be tolerated.

4. Environmental Stewardship

Alfion SA aims at maintaining a long-term sustainable supply chain and supports a responsible use and protection of the natural environment. Suppliers shall operate in an environmentally responsible manner, including:

- **Sustainable Practices** Suppliers shall identify opportunities to reduce environmental impact, including waste management, pollution control, and energy conservation. They shall identify, assess, take measures to prevent and mitigate environmental risks that might negatively impact their operations.
- **Resource Efficiency** Natural resources shall be efficiently used and the production of waste shall be minimized (e.g. via the circular use of raw materials).

5. Responsible Sourcing of Materials

Suppliers are expected to ensure that their materials, particularly diamonds, are sourced responsibly:

- **Traceability** The raw materials supply chains shall be mapped in order to provide visibility on its different actors and the various operational steps. Suppliers must put in place tools and processes to verify the stage that each product is going through. In the case of diamonds, the origin of the raw material must be guaranteed with appropriate documentation. Traceability shall be robust and verifiable.
- **Conflict-Free Sourcing** Suppliers must ensure that diamonds are not sourced from conflict-affected and high-risk areas. Suppliers must adhere to the Kimberly

Process Certification Scheme and the World Diamond Council (WDC) voluntary systems of warranties and must confirm on every invoice the WDC warranty statement.

- **Due Diligence** Due diligence processes to identify, assess, and mitigate risks associated with sourcing materials must be implemented. Suppliers shall document the processes with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

6. Compliance and Monitoring

Suppliers must:

- **Adhere to Laws** Suppliers must comply with all applicable laws and regulations relating to their activities and the countries in which they operate. They must put in place appropriate systems and controls to ensure continued compliance.
- **Cooperate with Audits** Suppliers must allow for and cooperate with Alfion SA or third-party audits to verify compliance with this Code of Conduct.
- **Continuous Improvement** Suppliers must engage in continuous improvement practices to enhance compliance and address any identified issues promptly.

7. Grievance Mechanism

Suppliers shall establish mechanisms for employees and stakeholders to report concerns or violations of this Code of Conduct without fear of retaliation. Reports can also be directed to Alfion SA's grievance mechanism for further investigation and action.

8. Commitment to Compliance

By signing this Supplier Code of Conduct, suppliers commit to upholding these standards and ensuring that their sub-suppliers and subcontractors also comply. Alfion SA reserves the right to take corrective action, including termination of the business relationship, if suppliers fail to meet these standards.

