

MEJURI

Supplier Code of Conduct

At Mejuri, we believe in fine jewelry as an expression of self, and in creating the pieces you love, it is just as important to us that our community feels good about how they are crafted. Our entire production ecosystem—including sourcing, manufacturing, and branding—aims to positively impact the communities that support our business, empower people around the world to design the life they want, and make our planet a better place. We want to use our reach and resources to make a difference and we expect our Suppliers to share our commitment to human rights, fair and safe labor practices, environmental protection and ethical business conduct.

In accordance with Mejuri's commitment to ethics and social responsibility, all Mejuri suppliers, their affiliates, agents, subcontractors and any other party providing goods and/or services, whether directly or indirectly, to such suppliers (collectively, "Suppliers") in connection with the production of any Mejuri merchandise or supply of any services to Mejuri shall operate in compliance with applicable laws, rules and regulations, as well as with principles of fair competition, and shall reject all forms of corruption.

We expect Suppliers to go beyond legal compliance and strive to meet internationally recognized standards for the advancement of human rights, business ethics, and social and environmental responsibility. Suppliers are encouraged to align with International Labor Organization ("ILO") conventions, the United Nations Global Compact, Guiding Principles on Business and Human Rights and Sustainable Development Goals, and work conscientiously to operate within these frameworks. Accordingly, Suppliers shall adhere to the requirements throughout this Code of Conduct.

APPLICABILITY

This code is applicable to all Mejuri suppliers, their affiliates, agents, subcontractors and any other party providing goods and/or services, whether directly or indirectly, to such suppliers. Suppliers are responsible for ensuring the Code of Conduct is understood and followed throughout their operations. Accordingly, Suppliers must make the requirements in this Code of Conduct known to all workers in their local language.

FREEDOM OF ASSOCIATION

Mejuri suppliers will respect the rights of employees to associate freely, organize and bargain collectively in a lawful and peaceful manner, without penalty or interference.

Where laws prohibit these freedoms, suppliers will support parallel means for independent and free association and bargaining and will adhere to collective bargaining agreements, where such agreements exist.

FORCED LABOR

Suppliers will not employ forced, indentured, debt-bonded or convict labor, nor use any practice to coerce the continued employment of any person, such as requiring employees to pay recruitment commissions or withholding any personal or travel documents. Employees are expected to be able to leave their employment without threat or coercion. Neither the company nor any entity supplying labor to the company shall withhold any part of any personnel's salary, benefits, property, or documents in order to force such personnel to continue working for the company.

Suppliers shall monitor relationships with recruitment agencies or contracted labor for risk of human trafficking and compliance with applicable anti-slavery laws.

CHILD LABOR & YOUNG WORKERS

Suppliers shall not use nor support the use of child labor as defined in ILO Convention 138 and the worst forms of child labor as defined in ILO Convention 182.

The minimum age for full time employment shall not be less than the age of completion of compulsory schooling and, in any case, shall not be less than 15 years (or 14 years where established by local laws in accordance with the ILO developing-country exception).

Suppliers shall ensure any young workers (those between the minimum age described above and 18 years old) are employed under well-defined circumstances, such as legal vocational training programs, that are not harmful to the health, safety or morals of young workers and that comply with applicable laws.

DISCRIMINATION

Suppliers will not practice or condone any form of discrimination in the workplace during any phase of the employment relationship due to race, ethnicity, caste, national origin, religion or belief, disability, gender, sexual orientation, union membership, political opinion, marital status, parental status, physical appearance, social group, veterans status, medical status, or age, or any other basis specified by law. All individuals shall be accorded equal opportunities and are not discriminated against on the basis of factors unrelated to their ability to perform their job.

HARASSMENT

All Mejuri suppliers are expected to provide a workplace that affords respect and dignity to all employees. The supplier shall ensure that employees are not subjected to harsh or degrading treatment, sexual or physical harassment, mental, physical or verbal abuse, corporal punishment, threats or other forms of mental or physical coercion, psychological or verbal harassment or intimidation to management and staff, their family, or colleagues shall not be tolerated in any circumstance.

DISCIPLINE

Suppliers shall clearly communicate disciplinary processes, and related standards, and apply them equally to all management and staff.

WORKING HOURS

Suppliers shall comply with local laws and seek to align with ILO conventions intended to ensure employees do not work excessive hours per week. Understanding the seasonal nature of the industry, in extraordinary business circumstances with their voluntary non-induced consent employees may be asked to work longer than standard hours. Workers shall be entitled to at least one day of rest following six consecutive days worked.

WAGES AND BENEFITS

Suppliers shall pay all workers a fair wage based on the higher of either the applicable legal minimum wage, or the prevailing industry standards.

Suppliers are encouraged to provide a level of compensation for a regular work week that is sufficient to meet basic needs and provide discretionary income. At a minimum, suppliers shall comply with applicable law in the payment of wages and the provision of benefits, including holidays, leaves and statutory severance.

Suppliers shall make payments to employees on a regular basis which has been previously communicated in writing and provide wage statements to employees which clearly states the wage rate, benefits and deductions for each pay period. Employees must be compensated for overtime hours at the rate legally required by local law or, where such laws do not exist, overtime should be at least 125% of the regular hourly compensation rate in accordance with ILO conventions.

GENERAL EMPLOYMENT TERMS

All employees shall be provided with a written, legally binding labor contract in a language the employee can understand.

SUBCONTRACTING

Suppliers shall not contract out any part of the work without disclosing such off-premise, homework, or subcontracting relationships to Mejuri. Any person working on behalf of the supplier on Mejuri goods will be subject to this Code and Suppliers are responsible for compliance with these requirements.

HEALTH AND SAFETY

Appropriate procedures should be in place to regularly assess the workplace for hazards and implement appropriate programs and engineering controls to minimize the risks of work-related accidents. Suppliers will strive to continually improve the effectiveness of their health and safety programs and seek to implement best practices in their industries.

Suppliers should be encouraged to have a nominated health & safety representative who monitors the facility's compliance with procedures.

Suppliers will provide employees with the necessary health and safety training and/or education and will secure adequate systems to detect and avoid potential threats and to help continuously improving health and safety are put in place.

ENVIRONMENT

Suppliers shall meet or exceed all environmental laws and regulations, and strive to meet or exceed the standards of international environmental treaties and best practices in their industries. Suppliers shall identify environmental risks and impacts, as well as opportunities for improving environmental performance. Suppliers shall implement and regularly review controls to mitigate identified environmental risks and minimize environmental impacts, including resource use, discharges, emissions and waste disposal, and take a proactive approach to monitoring and collecting data on these topics. Supplier operations and sourcing practices should strive to place special emphasis on the mitigation of climate change and the preservation and rehabilitation of biodiversity and ecosystems.

COMMUNITY DEVELOPMENT

Suppliers shall make every effort to proactively engage with and support development in the local communities where their operations and supply chains are located, and to employ, procure and build within those communities.

SECURITY

Suppliers shall take measures to ensure the safety and security of its workers, contractors and visitors. This includes assessing security risks and implementing measures to protect against product theft, intellectual property theft or loss of employee or customer data during manufacturing and transport of goods.

Suppliers shall take steps to ensure that human rights are protected in all aspects of its security operations, including in interactions among security personnel, workers and visitors. Suppliers are encouraged to align with the Voluntary Principles on Security and Human Rights where applicable.

BUSINESS INTEGRITY

Mejuri expects the highest standards of business integrity are upheld in all business interactions. Ethical business conduct and dealings, and transparency of those operations, are accurately reflected on their business books and records. Suppliers shall have a policy mandating business integrity.

PRODUCT DISCLOSURE

All disclosures on the nature and quality of materials and products sold to Mejuri must be accurately communicated. This includes but is not limited to location of origin, weight, color and clarity, treatments of gemstones, the standard of fineness and trademarks of articles of precious metals and other matters as required by applicable federal, state and local laws and in accordance with internationally accepted jewelry industry product disclosure standards.

Suppliers of diamonds (including diamonds set in jewelry) will take appropriate measures to mitigate the risk of undisclosed synthetic diamonds from entering Mejuri's supply chain.

ANTI CORRUPTION, BRIBERY, MONEY LAUNDERING

Suppliers shall not engage in any form of corrupt practices, including bribery, extortion, embezzlement, fraud, money laundering or any business related to terrorist or armed activity. Suppliers shall not violate or cause any Mejuri employee to violate the Canadian Corruption of Foreign Public Officials Act, United States Foreign Corrupt Practices Act, and the UK Bribery Act or any other applicable anti-corruption or bribery laws. Suppliers shall implement their own KYC-AML policy and monitoring and enforcement procedures shall be implemented to ensure compliance with applicable anti-corruption and bribery laws.

Suppliers shall maintain financial accounts of all business transactions where required by applicable law and in accordance with national or international accounting standards.

DUE DILIGENCE AND CONFLICT-AFFECTED AND HIGH-RISK AREAS

Suppliers of gold, silver, platinum group metals, natural diamonds and natural coloured gemstones will undertake supply chain due diligence in accordance with the 5-Step framework of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Due Diligence Guidance).

KIMBERLEY PROCESS CERTIFICATION SCHEME AND WORLD DIAMOND COUNCIL SYSTEM OF WARRANTIES

Mejuri supports the Kimberley Process Certification Scheme and the country-specific legislation that supports the legal trade of diamonds. All suppliers involved in the sale or trade of diamonds, whether rough, polished, or set in jewelry, shall adhere to the World Diamond Council System of Warranties and, where relevant, Kimberley Process Certification Scheme and have systems to ensure that all relevant invoices contain the required warranty statement to ensure all diamonds under that invoice meet warranty requirements.

TRACEABILITY AND TRANSPARENCY OF MATERIALS

Traceability and transparency are key to avoiding unintended negative impacts at any stage of the jewelry-making process and we are committed to the highest level of responsible sourcing. Suppliers shall make every effort to provide accurate traceability information related to raw materials, processing, and final assembly of all products manufactured for Mejuri's subsequent sale or distribution. Accurate and consistent inventory controls shall be implemented in all levels of the supply chain to ensure traceability and sourcing data is available for applicable raw materials through the supply chain. Suppliers are encouraged, where applicable, to complete Reasonable Country of Origin Inquiries for materials entering the recycled market. Suppliers shall provide accurate reporting on the annual percentage of mined, pre-consumer, and post-consumer recycled precious metals from their smelting and refining suppliers.

NON-MINED MATERIALS

Suppliers of non-mined materials, including but not limited to, pearls, leather/hide and paper based products, will ensure that these materials are responsibly sourced and produced in accordance with applicable laws, regulations and relevant industry best practices and/or standards.

GRIEVANCE MECHANISMS AND REMEDY

Suppliers shall maintain grievance mechanisms to respond to concerns and complaints that ensure effective, timely, respectful and transparent communication among workers, their representatives, management and the community.

LEGAL COMPLIANCE

Suppliers must, in addition to meeting the requirements of this Code, comply with all applicable local and national , rules, regulations and industry standards pertaining to Suppliers' operations and services. Where a difference between the code and legal requirements exists, the higher of the two standards shall prevail.

COMPLIANCE EXPECTATION AND CONTINUOUS IMPROVEMENT

Suppliers are responsible to take appropriate steps to ensure the provisions of this Code are communicated to their employees and their own supply chain. Suppliers are also responsible to ensure that the principles referred to herein are adopted and applied by their employees, suppliers, agents and contractors so far as reasonably possible. Suppliers are encouraged to report non-conformance in their operations or supply chain proactively to Mejuri.

Suppliers will authorize Mejuri and its designated agents to engage in monitoring activities to confirm conformance with this Code of Conduct and applicable law, including unannounced on-site inspections of manufacturing facilities and employer-provided housing; reviews of books and records relating to employment matters; and private interviews with employees. Manufacturers will maintain on site all documentation that may be needed to demonstrate compliance with this Code of Conduct and shall keep accurate and transparent records for all applicable areas of the business including, but not limited to, working hours, wages, and benefits at all times for all staff employed, whether on a full time, part time or seasonal basis. Suppliers shall regularly evaluate their conformance to this Code of Conduct and remediate any and all findings.

In the event of non-conformance to requirements, Mejuri Suppliers shall commit to remediate issues within the timelines provided by the Corrective Action Plan. We seek to collaborate with all Suppliers toward continuous improvement to achieve conformance with this Code; however, we reserve the right to cancel agreements or contracts, suspend future purchases or terminate the relationship with any Supplier when the situation demands.

Mejuri reserves the right to make changes to this Code of Conduct as needed and will promptly inform Suppliers of any changes thereof. Suppliers remain responsible for meeting the requirements of the most updated version.

This Code draws from industry and internationally accepted principles such as the Ethical Trading Initiative, International Labor Organization's (ILO) International Labor Standards, United Nations Guiding Principles on Business and Human Rights, Social Accountability International, SA 8000, the ILO's Code of Practice in Safety and Health, National Fire Protection Association, Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and OHSAS 18001.