

NATIONAL CHAIN COMPANY SUPPLY CHAIN POLICY

1. NATIONAL CHAIN COMPANY is a manufacturer of jewelry and precious metals products, specializing in chain. By combining the talents and skilled craftsmanship of chain manufacturing experts, we have developed proprietary techniques and equipment, making National Chain one of the most progressive, innovative, and respected manufacturers in our industry. This policy confirms NATIONAL CHAIN COMPANY's commitment to respect human rights, avoid contributing to the finance of conflict and comply with all relevant UN sanctions, resolutions, and laws.
2. NATIONAL CHAIN COMPANY is a certified member of the Responsible Jewellery Council (RJC). As such, we commit to proving, through independent third-party verification, that we:
 - a. Respect human rights according to the Universal Declaration of Human Rights and International Labour Organization Declaration on Fundamental Principles and Rights at Work;
 - b. Do not engage in or tolerate bribery, corruption, money laundering or finance of terrorism;
 - c. Support transparency of government payments and rights-compatible security forces in the extractives industry;
 - d. Do not provide direct or indirect support to illegal armed groups;
 - e. Enable stakeholders to voice concerns about the jewellery supply chain; and
 - f. Are implementing the OECD five-step framework as a management process for risk-based due diligence for responsible supply chains of materials from conflict-affected and high-risk areas.
3. We also commit to using our influence to prevent abuses by others.
4. Regarding serious abuses associated with the extraction, transport, or trade of gold, silver, platinum, diamonds, rubies, emeralds, and sapphires: We will not tolerate, profit from, contribute to, assist, or facilitate the commission of:
 - a. Torture, cruel, inhuman, and degrading treatment;
 - b. Forced or compulsory labor;
 - c. The worst forms of child labor;
 - d. Human rights violations and abuses; or
 - e. War crimes, violations of international humanitarian law, crimes against humanity or genocide.
5. We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are committing abuses described in paragraph 4 or are sourcing from, or are linked to, any party committing these abuses.
6. Regarding direct or indirect support to non-state armed groups: We will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring precious



55 Access Road, Warwick, Rhode Island 02886 U.S.A. (401) 732-6200 Fax (401) 738-1684 www.natchain.com

metals¹ or diamonds, rubies, sapphires, or emeralds from, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates who illegally:

- a. Control mine sites, transportation routes, points where precious metals and gemstones² are traded and upstream actors in the supply chain; or
 - b. Tax or extort money or precious metals or gemstones at mine sites, along transportation routes or at points where precious metals and gemstones are traded, or from intermediaries, export companies or international traders.
7. We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are sourcing from, or are linked to, any party providing direct or indirect support to non-state armed groups as described in paragraph 6.
8. Regarding public or private security forces: We affirm that 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. We will not provide direct or indirect support to public or private security forces that commit abuses described in paragraph 4, or that act illegally as described in paragraph 6.
9. Regarding bribery and fraudulent misrepresentation of the origin of precious metals or gemstones: We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of precious metals or gemstones, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of precious metals and gemstones.
10. Regarding money laundering: We will 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 precious metals and gemstones.
11. Regarding sourcing of diamonds: We confirm that all diamonds in our supply chain are sourced within the guidelines of the Kimberly Process Certification Scheme (KPCS), World Diamond Council System of Warranties (WDC SoW), and national law. We ensure our diamond suppliers also adhere to KPCS, WDC SoW, and all legal requirements and that they in turn source exclusively from actors operating under these guidelines.

Date of effect: February 1, 2023

¹ The term "precious metals" encompasses gold, silver, platinum, and palladium within this policy statement.

² "Gemstones" specifically refers to natural diamonds, rubies, sapphires, and emeralds for this policy statement.