



Grievance Procedure

Leo Wolleman, Inc. has established this grievance procedure to hear concerns about circumstances in its operations, Anti-Bribery policy, statements, human rights, supply chain procedures or OECD supply chain involving diamonds, colored gemstones and precious metals from conflict-affected and high-risk areas.

David Stein and Ken Gurny are responsible for implementing and reviewing this procedure.

Concerns can be raised by interested parties via email or telephone to:

David Stein (VP / Compliance Officer) or Ken Gurny (VP)

Tel: 212-205-6515

Email: dstein@leowolleman.com / gurnyk@leowolleman.com

On receiving a complaint, we will aim to:

- get an accurate report of the complaint;
- explain our complaints procedure;
- find out how the complainant would like it handled;
- decide who is the appropriate person internally to handle the complaint, or help redirect the complaint to another entity, such as the relevant supplier, or a relevant industry body;
- where the issue can be handled internally, seek further information where possible and appropriate;
- identify any actions we should take, or monitor the situation;
- advise the complainant of any decisions or outcomes; and
- keep records on complaints received, and the internal process followed, for at least five years.

Signed/endorsed:

David Stein

David Stein
Vice President
April 2, 2024

Leo Wolleman, Inc. ensures that the person / company filing this grievance shall do so without fear of blowback, retaliation, dismissal or harassment. The grievance filed shall remain confidential.