



# LEO WOLLEMAN, INC. 31 South Street Suite 4N3 Mount Vernon New York 10550

## Supply Chain Policy

- 1) Leo Wolleman, Inc., dba Color Craft, is a colored gemstone and jewelry manufacturer and wholesaler based in Mount Vernon, NY, with additional offices in Hong Kong and Thailand. This policy confirms Leo Wolleman, Inc.'s commitment to respect human rights, avoid contributing to the finance of conflict and comply with all relevant UN sanctions, resolutions and laws.
- 2) Leo Wolleman, Inc. is a member of the Responsible Jewellery Council (RJC). As such, we commit to following policies relating to the RJC OECD (Organization for Economic Co-operation and Development) Guidance and a commitment to identify and assess risks related to conflict affected and high-risk areas (CAHRA's). The areas of concern are:
  - A)
    - 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 jewelry 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 minerals from conflict-affected and high-risk areas.
  - B) Regarding serious abuses associated with the extraction, transport or trade of minerals: We will neither tolerate nor 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.
- 3) We also commit to using our influence to prevent abuses by others by informing our suppliers and stakeholders of our policies through e-mailings and online vehicles. Leo Wolleman, Inc. requires KYC forms from vendors and customers to prove legitimization in the diamond, gemstone and precious metal industry, as well as an acknowledgement letter that partnering companies will follow the points of interest of the RJC. Complaint mechanisms are in place through contacting our office and online. Companies that have proven to be blatant non-compliant with RJC policies will be removed from vendor/customer list until proof of correction can be shown. Companies that are suspected of abuses will be given up to 6 months to correct abuses and we will offer our guidance to correct the abuse. If after this time period said company has not changed its practices, we will stop working with said company. If it is suspected (internally or externally) that any of our upstream suppliers are sourcing materials from any Conflict-Affected and High-Risk Areas (CAHRA's), they shall immediately alert the Highest-ranking Company Officer available. Their alert shall remain anonymous and will be investigated by upper Management. Each potential alert will be handled individually and will be thoroughly reviewed. Due diligence will be used to confirm or dismiss the alert presented to Leo Wolleman, Inc. Whether the alert is deemed to be in violation will be based on the discretion of Leo Wolleman, Inc., the outlined guidelines in this document and in addition to all guidelines set forth by RJC. If there are any questions or complaints, please contact David Stein at [dstein@leowolleman.com](mailto:dstein@leowolleman.com) or call (212) 205-6515.
- 4) Whereas Leo Wolleman, Inc. requires the OECD due diligence from our suppliers, we in turn expect our suppliers to conduct their own OECD due diligence from their suppliers.
- 5) Regarding direct or indirect support to non-state armed groups: 1) We only buy or sell diamonds that are fully compliant with the Kimberley Process Certification Scheme and System of Warranties and 2) will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring minerals 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 minerals are traded and upstream actors in the supply chain; or
  - b) tax or extort money, or minerals at mine sites, along transportation routes or at points where minerals are traded, or from intermediaries, export companies or international traders.
- 6) It is the policy of Leo Wolleman, Inc. and its suppliers to be fully compliant with the Kimberley Process Certification Scheme and the World Diamond Council System of Warranties (SoW). All diamond invoices are to be compliant with the WDC SoW, stating "The diamonds herein invoiced have been {sourced} purchased from legitimate sources not involved in the funding of conflict, in compliance with United Nations Resolutions and corresponding national laws {where the invoice is generated}. The seller hereby guarantees that these diamonds are conflict free and confirms adherence to the WDC SoW Guidelines."
- 7) Where national law prevents the SoW statement from being included in your invoice, you should include it in separate accompanying documents.
- 8) 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 2 or 5.
- 9) 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 2B or that act illegally as described in paragraph 5.
- 10) Regarding bribery and fraudulent misrepresentation of the origin of minerals, we will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of minerals or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of minerals.
- 11) 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 minerals.
- 12) CVD's and simulants that are sold to Leo Wolleman, Inc. must be labeled accordingly to differentiate between natural and lab grown products. Invoicing must declare nature of product as natural or lab grown. Failure to properly disclose nature origin of product may lead to refunding of product.
- 13) As part of its core business, the following minerals are used by the company: Gold, Silver, Diamonds, Ruby, Sapphire, Emerald, semi-precious stones.
- 14) We hereby guarantee our diamonds have not originated from the Mbada and Marange regions of Zimbabwe.
- 15) All minerals used in the manufacturing of jewelry for Leo Wolleman, Inc. are responsibly sourced and conflict free.
- 16) Jewelry materials that are sold to Leo Wolleman, Inc. are to be compliant with the State of California lead and cadmium policies (See: Article 10.1.1 Chapter 6.5, Division 20, of the California Health and Safety Code (Sections 25214.1-25214.4.2).
- 17) All suppliers and customers must complete a Know Your Counterparty (KYC) document that contains basic background information, including: company contact information, owners/directors and beneficial partners. KYC's must be included for all partner companies. Suppliers must also complete the "Supplier Compliance Packet" that includes acknowledgement of above principles for Human Rights, sourcing of goods and accepted trade practices.
- 18) KYC information will be fact checked against government databases including OFAC Sanctions List, World Bank Listing of Ineligible Firms & Individuals and United Nations Security Council. We will not work with any company that has been sanctioned by these government organizations.

Policies are updated through government notices and trade notifications including:

[www.responsiblejewellery.com](http://www.responsiblejewellery.com), [www.kimberleyprocess.com](http://www.kimberleyprocess.com), [www.worlddiamondcouncil.org](http://www.worlddiamondcouncil.org), [www.un.org](http://www.un.org), [www.awdc.be](http://www.awdc.be), [www.gold.org](http://www.gold.org), [www.lbma.org.uk](http://www.lbma.org.uk), [www.agta.org](http://www.agta.org)

This policy is reviewed yearly and will be modified per updates to RJC protocols or due to a change in sourcing practices.

On an annual basis, Leo Wolleman, Inc. will review its supply chain and publicly report its findings.

David Stein is the manager of the Supply Chain Policy.

David Stein  
Vice President / Compliance Officer

Ken Gurny  
Vice President

April 1, 2024

To file a grievance against Leo Wolleman, Inc., please email [dstein@leowolleman.com](mailto:dstein@leowolleman.com).

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.