

M GELLER LTD'S & RJC GOLD AND PRECIOUS METALS SOURCING POLICY

M Geller Ltd is concerned about the environmental and social impacts of irresponsible mining practices. We are committed to sourcing gold and other precious metals produced under the highest social, human rights, and environmental standards. We are working to ensure that the gold and other precious metals in our products were not produced at the expense of communities, workers, or the environment and require that our suppliers adhere to the same principals.

Accordingly, as a condition of doing business with M Geller Ltd, each Supplier agrees to work to ensure that the gold and precious metals M Geller Ltd purchases, subject to availability, come from sources that meet the following human rights, social and environmental criteria at all stages in the supply chain (mining, processing, refining, recycling, etc.). Specifically, each Supplier agrees to do the following:

- Give preference to gold or other precious metals that are being sourced from mining operations that do not utilize submarine or riverine tailings disposal in order to reduce the volume of mine wastes disposed of in oceans, coastal waters and rivers annually.
- Require all parties involved in the mining, processing and manufacturing of the products M Geller Ltd sells to respect basic human rights (as outlined in international conventions and declarations such as the UN “Universal Declaration of Human Rights” and others).
- Source gold from mines that are developed and are being operated with the free, prior and informed consent of local communities.
- Require all parties involved in the mining, processing and manufacturing of the products M Geller Ltd sells to respect workers’ rights and labor standards (including the eight core ILO conventions).
- Not source gold from areas of armed or militarized conflict where there is high risk for human rights violations, and all gold is sourced in compliance with the Dodd-Frank Wall Street Reform & Consumer Protection Act
- Not source gold nationally or internationally from areas that are designated by a recognized authority as protected areas, or areas of high conservation or other ecological value (such as IUCN categories i-iv).
- Not source gold from mines that have been responsible for the forced displacement of communities.
- Not source gold from operations that will result in inadequately remediated sulfuric acid drainage into soil, groundwater and/or the environment.
- Source gold from mines that have provided full financial guarantees to cover the costs of clean-up and mine closure.

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- Support the development of an independent, third party verification system that verifies that gold and other precious metals meet these and other criteria and, assuming the competitive availability of gold and precious metals meeting the criteria listed above, commit to purchasing increasing percentages of M Geller Ltd.'s precious metals needs from such mine operations over time.
- Work in collaboration with Jewelers of America, the Responsible Jewelry Council, other industry associations, the gold and precious mining industry, financial institutions, non-governmental organizations, governmental institutions, jewelry manufacturers, jewelry companies and all other stakeholders throughout the supply chain developing methodologies for determining the sources and supply chain for all of our gold products, including information about how gold is being mined, refined and manufactured.
- Work with its suppliers of gold and other precious metals at facilities worldwide to introduce them to M Geller Ltd.'s goals of purchasing these metals from sources that meet the above criteria.
- Commit to increasing the sourcing of gold from recycled and secondary sources, setting targets for increasing the use of these sources and seeking independent, third-party verification of secondary content.
- Implement policies that promote more responsible production of gold and precious metals and serve as a leader within M Geller Ltd.'s sector, not only through purchasing practices, but also by encouraging other companies within the industry to do the same.

M GELLER LTD'S RJC PRINCIPLES AND CODE OF PRACTICES

Introduction. M Geller Ltd.'s Principles and Code of Practices (the "M Geller Ltd Code") mirrors those of the Responsible Jewelry Council ("RJC"). The RJC is a not-for-profit organization established to promote responsible ethical, social and environmental practices, which respect human rights throughout the diamond and/or gold jewelry supply chain, from mine to retail. The provisions of the Principles and Code of Practices (the "RJC Code") were established based on national and international law, international and national industry standards and responsible business practice. International standards referenced in the development of the RJC Code include:

- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal;
- Ethical Trading Initiative – Base Code;
- Financial Action Task Force standards against money laundering and the finance of terrorism;
- International Cyanide Management Code;
- International Diamond Council Rules for Grading Polished Diamonds (2008);

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- International Labor Organization (“ILO”) Fundamental Rights at Work (Conventions for the elimination of child labor, forced and compulsory labor and discrimination in the workplace, and for freedom of association and collective bargaining);
- Kimberley Process Certification Scheme and World Diamond Council System of Warranties for diamond shipments;
- SA8000 on child labor, remuneration, working hours, workplace discipline and grievance procedures;
- The World Jewelry Confederation (“CIBJO”) regulations for product integrity and disclosure;
- United Nations Global Compact;
- United Nations Universal Declaration of Human Rights; and
- Voluntary Principles on Security and Human Rights.

Purpose. The RJC Code defines responsible ethical, human rights, social, and environmental practices for businesses in the diamond and/or gold jewelry supply chain. Consistent with the RJC Code, the objectives of the M Geller Ltd Code are to:

- Provide a common standard for M Geller Ltd and its Suppliers that build on international standards for responsible business practices;
- Set out the expectations for the establishment, implementation and maintenance of policies, procedures and practices in order to manage issues within M Geller Ltd.’s control and our suppliers’ control; and
- Drive improvement of business practices for the gold and/or diamond jewelry supply chain.

M Geller Ltd General Principles. M Geller Ltd seeks economic, social and environmental benefits from its business activities so that it contributes to sustainable development.

A. Business Ethics

- (1) M Geller Ltd is committed to conducting businesses to a high ethical standard and to ensuring integrity, transparency and conformance with applicable law.
- (2) M Geller Ltd will not engage in bribery and/or corruption.
 - (a) Suppliers will prohibit bribery in all business practices and transactions that are carried out by them or on their behalf by business partners. Suppliers will not offer, accept or countenance any payments, gifts in kind, hospitality, expenses or promises as such that may compromise the principles of fair competition or constitute an attempt to obtain or retain business for or with, or direct business to, any person; to influence the course of the business or governmental decision-making process.

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- (b) Suppliers will consider bribery risk as it applies to their organization (including agents) to identify which areas pose high risks. Members will develop appropriate methods to monitor conduct of employees and agents and eliminate bribery based on this understanding.
 - (c) Suppliers will facilitate the reporting of incidences of attempted bribery or inappropriate gifts within their organization and will apply the appropriate sanctions for bribery and attempted bribery in all forms.
 - (d) Suppliers will clearly communicate to their employees that no employee will suffer demotion, penalty or other adverse consequences for voicing a concern, or for refusing to pay a bribe or facilitation payment even if this action may result in the enterprise losing business.
 - (e) Where Suppliers have not yet been able to eliminate facilitation payments, Suppliers will implement appropriate controls to monitor, oversee and fully account for all facilitation payments made. They will work to ensure that they are of limited nature and scope, with an ultimate objective to eliminate all facilitation payments.
- (3) M Geller Ltd will not tolerate money laundering and/or financing of terrorism.
- (a) Suppliers must maintain financial accounts of all business transactions where required by applicable law and in accordance with national or international accounting standards. These accounts must be independently certified and/or audited, by a properly qualified auditor who is appointed free of any bias or influence.
 - (b) Suppliers should be aware that international transactions may be subject to more than one jurisdiction.
 - (i) Where no applicable law exists, Suppliers will comply with the provisions in the Financial Action Task Force (“FATF”)3 40 Recommendations and 9 Special Recommendations as applicable to dealers in Precious Metals and gemstones under the Designated Non-Financial Business Professions (“DNFBP”).
 - (ii) Cash or cash-like transactions should always take place in compliance with applicable law. Where they occur above the relevant defined financial threshold, records need to be lodged with the relevant designated authority.
 - (c) Suppliers must operate according to the principles of “know your customer” so as to establish the identity of all organizations with which they deal, have a clear understanding of their business relationships and have a reasonable ability to identify and react to transaction patterns appearing out of the ordinary or suspicious.

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- (4) M Geller Ltd will adhere to the Kimberley Process Certification System and the World Diamond Council voluntary system of warranties.
- (a) Suppliers must not knowingly buy or sell conflict diamonds or assist others to do so.
 - (b) Suppliers, where involved with the international trade of rough diamonds, must apply the rough diamond export and import verification system and controls as laid out by the Kimberley Process Certification Scheme and relevant national legislation. Suppliers must keep records of Kimberley Process Certificates for rough diamonds.
 - (c) Kimberley Process Certificates must be independently audited and reconciled by a company's own independent auditor on an annual basis. If asked for by a duly authorized government agency, these records must be able to prove compliance with the Kimberley Process.
 - (d) Suppliers, where involved in buying and selling diamonds must fully adhere to the principles of the World Diamond Council Resolution on Industry Self-Regulation. Members are required to have systems in place so that all invoices for diamonds contain the World Diamond Council ("WDC") warranty statement⁴. Suppliers must keep records of all such invoices. Suppliers must have systems in place so that they do not purchase from sources that do not provide the WDC warranty statement on their invoices.
 - (e) Suppliers will inform all employees that buy or sell diamonds about government restrictions on the trade in conflict diamonds, the Kimberley Process Certification Scheme and the WDC system of warranties.
- (5) M Geller Ltd will fully and accurately disclose the material characteristics of the products that we sell.
- (a) General: Suppliers will at all times comply with relevant trading standards legislation and, where they exist, specific national and/or local regulations applicable to diamond and gold jewelry products. Where no specific trading standards or product integrity regulations apply, Suppliers must comply with the requirements listed below.
 - (b) Proper Disclosure: Suppliers must make all reasonable efforts to properly disclose all relevant information on the physical characteristics, such as mass/weight, cut, color, clarity or fineness, of a diamond or gold jewelry product.
 - (c) Misrepresentation: Suppliers will not make any untruthful, misleading or deceptive statement, representation⁵ or material omission in the selling⁶, advertising⁷ or distribution of any diamond, treated diamond, synthetic or simulant, or any gold product, in any medium, including the Internet.

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- (d) Gold:
- (i) Suppliers will accurately disclose the fineness of the gold used in their products.
- (ii) When applying gold quality marks to articles wholly or in part composed of gold, Suppliers will apply a mark authorized to be applied thereto under applicable law that correctly indicates the quality of the gold of which the article is in whole or in part composed. The mark will be applied in a manner authorized by applicable law or relevant international standards.
- (e) Treated Diamonds:
- (i) A treated diamond must be disclosed as either “treated” or with specific reference to the particular treatment. The description must be as equally conspicuous and placed immediately preceding the word(s) “diamond” or “synthetic”, as the case may be. Specifically:
- Any term that is designed to disguise that treatment has occurred, or to imply that a treatment is part of the normal polishing process or that misleads the consumer in any way must not be used. For example, the term “improved” must not be used to describe a treated diamond.
 - Any special care requirements that the treatment creates must be disclosed.
- (ii) Names of firms, manufacturers or trademarks are not to be used in connection with treated diamonds, unless such names are clearly succeeded by the word “Treated” as defined in this section or are otherwise equally conspicuously and prominently disclosed as treated.
- (f) Synthetic Diamonds:
- (i) A wholly or partially synthetic diamond must always be disclosed as “laboratory created”, “laboratory grown”, “man-made”, “[Manufacturer’s name] created”, and/or “synthetic” and the description must be equally as conspicuous and immediately preceding the word “diamond”.
- (g)
- (i) Suppliers will not use the words “real”, “genuine” or “natural” to describe any synthetic, or any terms that may disguise the fact that a diamond is synthetic or that mislead the consumer in any way.
- (h) Diamond Simulants:
- (i) Suppliers must always disclose a simulant either as the mineral or compound that it is, or as a “diamond simulant” or “imitation diamond”. The unqualified word “diamond” must never be used with simulants.

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- (ii) Suppliers will not use the words “real” and “genuine” to describe any simulant.
- (iii) Suppliers will not use the word “natural” to describe any simulant if the simulant is not a naturally occurring mineral or compound.
- (i) Diamond Quality – Cut and Polished Diamonds:
 - (i) Suppliers, when describing the weight, color, clarity or cut of diamonds will at all times do so in accordance with the recognized guidelines appropriate to the particular jurisdiction.
 - (ii) Suppliers will not use the word “flawless” or “perfect” to describe either:
 - Any diamond that discloses flaws, cracks, inclusions, carbon spots, clouds, internal lasering or other blemishes or imperfections of any sort when examined under a corrected magnifier at 10-power, with adequate illumination by a person skilled in diamond grading; or
 - Any article of Jewelry that contains any diamonds that do not meet the definition of “flawless” or “perfect”.
 - (iii) Suppliers will not use the terms “brilliant”, “brilliant cut” or “full cut” to describe, identify or refer to any diamond except a round diamond that has at least 32 facets plus the table above the girdle, and at least 24 facets below it.
- (6) M Geller Ltd will take reasonable measures to ensure the physical integrity and security of product shipments.
 - (a) Suppliers will ensure that the security of people is prioritized when establishing product security measures to protect against product theft, damage or substitution within the premises and during shipments.
 - (b) The security and well-being of employees, visitors and other relevant business partners will be prioritized when establishing product security measures.
- 1. M Geller Ltd will respect commercial confidentiality and data privacy.

B. Human Rights and Social Performance

- (1) M Geller Ltd believes in and will respect the fundamental human rights and the dignity of the individual, according to the United Nations Universal Declaration of Human Rights.
 - (a) Suppliers will at all times respect the fundamental human rights and the dignity of the individual, according to the United Nations Universal Declaration of Human Rights.

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- (2) M Geller Ltd will not tolerate the use of child labor.
 - (a) Suppliers will not engage in or support the employment of children (younger than 15 years, or 14 years where the law of the country permits) beyond those circumstances defined in ILO Convention 138 and Recommendation 146 unless sanctioned by national and/or local government or as part of a recognized apprentice scheme, in accordance with the guidelines laid down in the Global Compact⁹.
 - (b) Where any children are found to be in employment, Suppliers will provide adequate support to enable them to attend and remain in school until no longer a child. Child labor remediation processes will include steps for the continued welfare of the child and consider the financial situation of the child's family. Children found to be in employment contrary to minimum age requirements may remain in partial employment during a phased remediation process. Suppliers will provide a minimum period of night time rest of twelve hours, with customary weekly rest days; and ensure that overtime is prohibited and the child receives fair payment for the work he or she is undertaking.
 - (c) Suppliers will promote education for children covered under ILO Recommendation 146 and young persons who are subject to local compulsory education laws or attending school, including means to ensure that no such child or young person is employed during school hours and that combined hours of daily transportation (to and from work and school), school and work time does not exceed ten hours a day.
 - (d) Suppliers will not expose a child or young person to work, which by its nature or the circumstances in which it is carried out, is likely to jeopardize the health, safety or morals of persons younger than 18 years (or 16 years subject to authorization in applicable law and the receipt of adequate and specific instruction or vocational training in the relevant branch of activity).
- (3) M Geller Ltd will not use any forced, bonded, indentured or prison labor, nor restrict the freedom of movement of employees and dependents.
 - (a) Suppliers will not use forced labor (including bonded, indentured or prison labor), nor restrict the freedom of movement of employees.
 - (b) Suppliers will not retain original copies of employee personal documentation, such as identity papers, nor require any form of deposit, recruitment fee, or equipment advance from employees either directly or through recruitment agencies.
- (4) M Geller Ltd is committed to high standards of health and safety in its operations.
 - (a) Suppliers will provide safe and healthy working conditions for all employees in accordance with applicable law and other relevant industry standards. These conditions include:

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- (i) minimizing, so far as reasonably practicable, the causes of workplace hazards;
 - (ii) appropriate safeguards and isolation between employees and all machinery including mobile equipment;
 - (iii) adequate and appropriate labeling and storage of all chemicals and cleaning materials;
 - (iv) methods to protect employees from exposure to airborne particles and chemical fumes;
 - (v) providing appropriate personal protective equipment free of charge and verify that it is current, worn correctly and used as necessary;
 - (vi) providing work stations that are designed as appropriate to the task performed, to minimize occupational health risks such as repetitive strain;
 - (vii) adequate lighting, ventilation and air quality; safe noise levels and temperatures;
 - (viii) maintaining adequate workplace hygiene at all times by conducting regular routine cleaning, providing safe and accessible potable water and sanitary facilities for food storage, and clean and hygienic washing and toilet facilities commensurate with the number and gender of staff employed;
 - (ix) providing adequately constructed and maintained workplaces to meet local building regulations; and
 - (x) Ensuring that if employees are provided with on-site housing by members, such housing will be maintained to a reasonable standard of safety, repair and hygiene; and provided with sufficient and proper sanitation facilities, potable water and access to adequate power supply.
- (b) Suppliers who are engaged in the cutting and polishing of diamonds will use cobalt-free diamond-impregnated scaifes.
 - (c) Suppliers will provide employees with a mechanism, such as a joint health and safety committee, by which they can raise and discuss health and safety issues with management.
 - (d) Suppliers will make clear information about health and safety available to employees in an understandable form and in an appropriate language. Material Safety Data Sheets (or equivalent necessary information) will be accessible where all hazardous substances are in use, and the risks associated with use of hazardous substances must be clearly communicated to all employees who work with them.

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- (e) Appropriate procedures must be in place to prevent accidents and injury to health arising from, or linked to, the course of work-related activities and operations at a facility.
 - (f) Suppliers will provide access to adequate on-site health and medical facilities, including clearly marked first aid provisions, and develop procedures for transportation of more serious health concerns to local hospitals or medical facilities.
 - (g) Suppliers will install appropriate alarms, warning devices and fire safety mechanisms. This includes firefighting equipment; clearly marked, unlocked and unblocked emergency exits and escape routes; and emergency lighting in all facilities.
 - (h) Suppliers will establish emergency procedures and evacuation plans for all reasonably foreseeable emergencies. Suppliers will ensure that the procedures and plans are accessible or clearly displayed throughout the facilities, are maintained, regularly tested (including the conduct of evacuation drills) and are updated.
 - (i) Suppliers will provide training so that employees are aware of: specific role-related health and safety risks and hazards, and methods for appropriate protection from such hazards, including proper use of personal protective equipment and appropriate action to take in the event of an accident or emergency. Training will include first aid training to designated employee representatives and appropriate training in fire safety and emergency procedures for all employees. Training undertaken must be recorded and repeated for new and re-assigned employees.
 - (j) Suppliers will ensure that serious health and safety incidents, as well as the business' response and outcome from such incidents, are formally documented and investigated with the results of the investigation feeding into regular health and safety reviews and improvement plans.
 - (k) Suppliers will ensure that employees and contractors understand that they have the right and responsibility to stop work or refuse to work in situations that have uncontrolled hazards and to immediately bring these situations to the attention of those at imminent risk and to management.
 - (l) Diamond or gold jewelry products sold by Suppliers to end consumers will be compliant with the applicable regulations for product health and safety
- (5) M Geller Ltd will not prevent workers from associating freely. Where laws prohibit these freedoms, M Geller Ltd will support parallel means of dialogue.
- (a) Suppliers will not prevent employees from associating freely. Where laws prohibit these freedoms, Suppliers will support parallel means for independent and free association and bargaining¹⁰.
 - (b) Suppliers will not prevent collective bargaining and will adhere to collective bargaining agreements, where such agreements exist

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- (6) M Geller Ltd will not discriminate based on race, ethnicity, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, marital status, physical appearance, age or any other applicable prohibited basis in the workplace, such that all individuals who are “fit for work” are accorded equal opportunities and are not discriminated against on the basis of factors unrelated to their ability to perform their job.
- (a) Suppliers will not practice or condone any form of discrimination in the workplace in terms of hiring, remuneration, overtime, access to training, promotion, termination or retirement based on race, ethnicity, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, marital status, pregnancy status, physical appearance, HIV status or age, or any other applicable prohibited basis, such that all individuals who are “fit for work” are accorded equal opportunities and are not discriminated against on the basis of factors unrelated to their ability to perform their job.
- (7) M Geller Ltd will not use corporal punishment under any circumstances and will prohibit the use of degrading treatment, harassment, abuse, coercion or intimidation in any form.
- (a) Suppliers will not use corporal punishment under any circumstances, and will ensure that employees are not subjected to harsh or degrading treatment, sexual or physical harassment, mental, physical or verbal abuse, coercion or intimidation in any circumstances.
- (b) Suppliers will clearly communicate the business’s disciplinary process and related standards on appropriate disciplinary procedures and employee treatment and apply these equally to all management and staff.
- (c) Suppliers will provide clear grievance procedures and investigation processes and clearly explain these to all employees. Records of employee grievances raised, investigation processes and outcome will be maintained.
- (8) M Geller Ltd will adhere to working hours and remuneration legislation, or, where no such legal requirements have been established by law, the prevailing industry standards.
- (a) Suppliers will apply normal working hours that comply with applicable law. Where no specific laws and regulations exist, working hours will not exceed, on a regular basis, a maximum of 48 hours per working week in accordance with ILO Convention 1. Weekly rest and paid annual leave will be provided in accordance with ILO Conventions 14 and 132. Where these limits are required to be exceeded in special circumstances (for example on fly-in, fly-out sites), this should be in compliance with applicable law and should be planned so as to provide safe and humane working conditions.

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- (b) If overtime is required for business needs, Suppliers will compensate overtime to their employees according to applicable law. Overtime will be voluntary and except in special circumstances (for example fly-in fly-out sites) be limited to a maximum of twelve hours in a week.
- (c) Suppliers will provide employees with all legally mandated leave, including maternity and paternity, compassionate and annual leave. Where to applicable law exists, paid annual leave will be provided in accordance with ILO Convention 132.
- (d) Suppliers will provide all employees with at least one rest day in seven consecutive working days. Where these limits are required to be exceeded in special circumstances (for example on fly-in, fly-out sites), this will be in compliance with applicable law, or where no specific laws exist, the prevailing industry standards. All exceedances should be planned so as to provide safe and humane working conditions.
- (e) Suppliers will pay all employees a wage based on the higher of applicable legal minimum wage plus associated statutory benefits or the prevailing industry standards.
- (f) Suppliers will make payment to the employee on a regular and pre-determined basis.
- (g) Suppliers will provide payment by bank transfer or in cash or check form, in a manner and location convenient to the employees.
- (h) Suppliers will accompany all payments by a wage slip which clearly details wage rates, benefits and deductions where applicable.
- (i) Suppliers will not make deductions from wages without following due process.
- (j) Suppliers will not force employees to buy provisions from the member's own business or facilities.
- (k) Obligations to employees under applicable law relating to labor or social security arising from the regular employment relationship will not be avoided through the use of labor-only contracting, sub-contracting, or home-working arrangements; or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment; or through the excessive use of fixed-term contracts of employment.
- (l) Suppliers will maintain appropriate employee records, including records of piece rate and wage payments as well as working hours, for all staff employed, whether on a full time, part time or seasonal basis.

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- (9) M Geller Ltd will support the development of communities where it operates, contributing to the social and economic welfare.
 - (a) Suppliers will seek to support the development of the communities in which they operate through support of community initiatives.
- (10) M Geller Ltd will provide appropriate security personnel.
 - (a) Suppliers will use armed security personnel only when there is no acceptable alternative to manage risk or to ensure the personal safety of employees, contractors and visitors to the facility.
 - (b) Suppliers will ensure that all security personnel respect the human rights and dignity of all people and use the minimum force proportionate to the threat.
 - (c) Suppliers will ensure that, in situations of ongoing unrest or conflict, security personnel will receive appropriate training in, and operate in accordance with, the standards and principles defined in the Voluntary Principles on Security and Human Rights (2000).
- (11) M Geller Ltd will recognize and respect the rights of indigenous peoples and the value of their traditional, cultural and social heritage.

C. Environmental Performance

- (1) M Geller Ltd will conduct business in an environmentally responsible manner.
 - (a) Suppliers will, wherever appropriate, introduce management and operating systems to minimize the detrimental environmental impacts of its business practices.
 - (b) Suppliers will not manufacture, trade, and/or use chemicals and hazardous substances subject to international bans or phase-outs due to their high toxicity to living organisms, environmental persistence, potential for bioaccumulation, or potential for depletion of the ozone layer.
 - (c) Suppliers will employ alternatives to other hazardous substances used in production processes wherever technically and economically viable.
 - (d) All mining Suppliers using cyanide in the recovery of gold will comply with the International Cyanide Management Code (2005) and will ensure applicable sites are certified to the International Cyanide Management Code within three years.
- (2) M Geller Ltd will manage its environmental footprint by eliminating or minimizing negative environmental impacts.
 - (a) Suppliers will dispose of waste substances in compliance with applicable law. Where applicable law does not exist, prevailing international standards will be adopted.

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- (b) Suppliers will take steps to reduce the quantity of waste produced from their operations through the principles of reduce, recover, re-use and recycle. All waste will be responsibly managed and the waste disposal decision making process will take into account environmental considerations as well as cost considerations.
- (c) Suppliers will seek to decrease emissions to air, water and land relative to production output.
- (3) M Geller Ltd will ensure the efficiency of its business operations by managing the use of resources and energy.
 - (a) Suppliers will seek to ensure the efficiency of their business operations in terms of consumption of natural resources including, but not limited to, water and energy.
 - (b) Where transportation of people, goods and materials is a significant business impact, Suppliers will seek to identify and implement practices that reduce use of fossil fuels and associated greenhouse gas emissions from transportation.

D. Legal Compliance and Policies

- (1) M Geller Ltd will comply with applicable law.
 - (a) Suppliers will be aware of and comply with applicable law.
- (2) M Geller Ltd will establish policies supporting implementation of the M Geller Ltd Code.
 - (a) Suppliers must adopt policies endorsed by their senior management, which support achievement of M Geller Ltd.'s Code and make the policy publicly available.
 - (b) Suppliers will consider risks associated with business ethics, human rights, social and environmental performance of significant business partners in the gold and diamond jewelry supply chain. Based on this risk assessment, Suppliers will use their best endeavors, commensurate with their ability to influence, to promote responsible jewelry practices among their business partners.
 - (c) Contractors working on Supplier's facilities and visitors to these facilities will be required to comply with the Supplier's management and operating systems established to meet the M Geller Ltd Code.

IN SUMMARY:

Bribery: M Geller Ltd will not engage in bribery and/or corruption. M Geller Ltd will not tolerate money laundering and/or financing of terrorism.

Kimberley Process: M Geller Ltd requires all Suppliers, where involved in buying and selling diamonds must fully adhere to the principles of the Kimberley Process Certification and World Diamond Council Resolution on Industry Self-Regulation.

Full Disclosure: M Geller Ltd will fully and accurately disclose the material characteristics of the products that we sell.

Human Rights: M Geller Ltd believes in and will respect the fundamental human rights and the dignity of the individual, according to the United Nations Universal Declaration of Human Rights.

Child Labor: M Geller Ltd requires its Suppliers to comply with the laws of the country of origin; however, M Geller Ltd will not use labor from persons under 15 years of age, regardless of the law of the country of origin. Suppliers must assure that their factories, and the factories of their direct or indirect subcontractors, do not employ persons younger than 15 years of age.

Forced Labor: M Geller Ltd requires that all employment by Suppliers should be on a voluntary basis. M Geller Ltd will not accept products from Suppliers that use forced labor in producing their products.

Compensation: M Geller Ltd requires that all Suppliers' compensation should be in compliance with local laws.

Working Hours: M Geller Ltd.'s Suppliers are required to have reasonable work hours, which are in compliance with local laws. Employees must not work more hours in one week than allowable under applicable law, and should be properly compensated for overtime work.

Discrimination: M Geller Ltd.'s Suppliers should have a social and political commitment to basic human rights and must not discriminate against employees in their hiring practices, any other term or condition of employment or harass employees on the basis of race, color, national origin, citizenship, gender, pregnancy, sexual orientation, religion or disability.

Health and Safety: M Geller Ltd requires that Suppliers provide a healthy and safe work environment in accordance with local laws. Employment facilities must have adequate first-aid facilities, fire exists, safety equipment, adequate workstations, clean restrooms and adequate living quarters where necessary.

Environmental: M Geller Ltd requires that Suppliers comply with local environmental laws and regulations.