

Responsible Supply Chain Policy

1 - Del West Europe SA (Del West) is a company active in the design, manufacture and marketing of components and assemblies for the watch, luxury, luxury goods, motorsport and automotive industries, located in Roche, Switzerland. This policy confirms Del West's commitment to respect human rights, to avoid contributing to the financing of conflicts and to comply with all relevant United Nations sanctions, resolutions and United Nations law.

2 - Del West is a 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 Fundamental 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 extractive industry;
- d. do not provide direct or indirect support to illegal armed groups;
- e. enable stakeholders to voice concerns about the jewellery supply chain;
- f. are implementing the OECD 5-Step framework as a management process for risk based due diligence for responsible supply chains of minerals from conflict-affected and high-risk areas

3 - We also commit to using our influence to avoid possible violations by other parties. We inform our partners, suppliers and customers, and ask them to respect certain commitments. We have a complaint policy available to stakeholders who wish to bring to our attention questions or concerns regarding materials from conflict and high-risk zones.

4 - Regarding serious abuses associated with the extraction, transport or trade of precious metals We will neither tolerate nor profit from, contribute to, assist or facilitate the commission of:

- a. torture, cruel, inhuman and degrading treatments;
- b. forced or compulsory labour;
- c. the worst forms of child labour;
- 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 linked to, any party committing these abuses.

6 - Regarding direct or indirect support to non-state armed groups, we only sell or purchase precious metals that do not directly or indirectly support non-state armed groups, including, but not limited to, procuring precious metals 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 are traded and upstream actors in the supply chain; or
- b. tax or extort money or precious metals at mine sites, along transportation routes or at points where precious metals are traded, or from intermediaries, export companies or international traders.

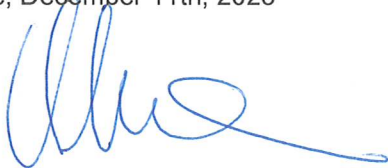
7 - We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are sourcing from, or are linked to, any party providing direct or indirect support to non-state armed groups as described in paragraph 6.

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 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 to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of precious metals.

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.

Roche, December 11th, 2023

A handwritten signature in blue ink, appearing to read "Olivier Conne".

Olivier Conne, Managing Director