

COMPANY NAME: **Roberto Coin Inc.**
DATE: **November/December 2022**
REPORTING PERIOD: **2023 Calendar Year**

COMPANY MANAGEMENT SYSTEMS

Roberto Coin Inc. is committed to respecting human rights and complying with all relevant US sanctions, resolutions, and laws. Roberto Coin Inc. respects human rights throughout our supply chain and our supply chain

due diligence on the following minerals- gold, diamonds and colored gemstones originating from conflict-affected and high-risk areas.

We also include information about our complaint's mechanism for parties to voice concerns about materials from Conflict-Affected and High-Risk Areas and assurance that all of our gold, diamonds and colored gemstones have been sourced responsibly. These methods have strengthened our due diligence efforts by creating both healthy and transparent relationships with our suppliers. Roberto Coin Inc. endorses these policies to our suppliers and stakeholders by distributing them via email. These policies can also be accessed by our internal stakeholders via our employee handbook.

DUE DILIGENCE

To support supply chain due diligence, we have implemented the following internal measures, through independent third-party verification:

1. Respect human rights according to the Universal Declaration of Human Rights and International Labor Organization Fundamental Rights at Work.
2. Do not engage in or tolerate bribery, corruption, money laundering or finance of terrorism.
3. Support transparency of government payments and rights-compatible security forces in the extractives industry.
4. Do not provide direct or indirect support to illegal armed groups.
5. Enable stakeholders to voice concerns about the jewelry supply chain.
6. 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.

The senior manager responsible for overseeing supply chain due diligence is Britt Elwell, Senior VP. To aid us in identifying our human rights impacts, we have developed and implemented the systems above; we have the following human rights policy in place which can be found in the handbook. The senior manager responsible for overseeing our human rights impacts is Britt Elwell.

We source our products from reputable suppliers, eliminating potential risk of any kind including CAHRA.

The KYC process and information obtained from suppliers is verified against watch/sanctioned list and verification of the location of the Business Counterparty and source location with the countries and Areas listed under CAHRA.

We assess our supplier's due diligence practices by implementing a system for identifying high and low risk mineral sources in our supply chain. The approach to assessing our high and low risk minerals has been through an analysis of Conflict, Human Rights and Governance that are marked by CAHRA. We used the list of resources directly from RJC Due Diligence Toolkit as well as other sources in identifying CAHRAs. We first identified the source of each supplier. Second, for each source location we assessed if it is a high or low risk by studying the various resources, information, and surveys provided by RJC Due Diligence Toolkit and their impacts on our supplier locations. The assessment of high and low risk was conducted on Human Rights, Conflict and Governance for each of our Business Counterparty source locations. As a way of example, we used <https://www.cahraslist.net/cahras>, Heidelberg Conflict Barometer, and Global Peace Index to assess high and low risk in area of conflict. We will consider a rating of 2 or above as an area of concern. If a vendor operates in area of this rating, we ask for further clarification and cease business with that vendor until the matter has been resolved.

In regards to human rights and governance, we also will use the United Nations as reference. Anywhere, where the US government identifies an HRC investigation, we will then determine if the country /area has egregious claims. If so, we will speak to our suppliers and ask for further clarification about how they are doing business in that area and if they cannot provide an accurate response we will cease doing business with them until the situation is remedied. <https://www.ohchr.org/en/good-governance/about-good-governance>

SUPPLY CHAIN TRANSPARENCY

Roberto Coin, Inc. has established a system of controls and transparency over our supply chain; which include our approach for identifying suppliers, through independent third-party verification. As a company, we communicate our expectations regarding human rights and supply chain due diligence. We use our influence to prevent abuses by others and address the risks of non-compliance by our suppliers. We will neither tolerate nor profit from, contribute to, assist, or facilitate the commission of: forced or compulsory labor, any forms of child labor, war crimes, violations of international humanitarian law, crimes against humanity, human rights violations and abuses, or torture, cruel, inhuman, and degrading treatment. The suppliers we use have a longstanding status of reputable practices.

Our approach for identifying suppliers include checking the companies on the OFAC Sanction database annually to ensure there is no change within their status and they have not breached any of these policies. Roberto Coin Inc. will verify the information provided by the supplier, while continuing to gather more information using the supplier's website, internet searches, and conduct informative meetings with other companies who work closely with each supplier. Once our Executive management team conducts a thorough investigation into the supplier, Roberto Coin Inc. conducts a third-party screening. This screening includes looking into the company's financials, affiliated companies, and company structure.

Roberto Coin Inc. has incorporated a risk assessment in which all suppliers are ranked from A (NO RISK) to D (HIGH RISK). These rankings are based on all of the information provided by the supplier as well following the KYC procedure. We require each supplier to provide documentation (not limited to) that informs Roberto Coin Inc. if they are RJC certified, if they comply with Kimberly Process, where they are sourcing gold, diamonds, and colored gemstones, ensure that they are compliant with UN resolutions, follow WDC SoW guidelines, ensure RC inc. that they are not operating or sourcing from any CAHRA, they must provide W9s and any other relevant information about their company.

Any suppliers who are ranked either C or D at the completion of the Risk Assessment step will require enhanced due diligence. At this point our Executive management team would meet to discuss the next steps. Roberto Coin has yet to ever rank a supplier either C or D.

ROBERTO COIN ENGAGEMENT WITH SUPPLIERS

As a company, we communicate our expectations regarding human rights and supply chain due diligence. We use our influence to prevent abuses by others and address the risks of non-compliance by our suppliers. We will neither tolerate nor profit from, contribute to, assist, or facilitate the commission of: forced or compulsory labor, any forms of child labor, war crimes, violations of international humanitarian law, crimes against humanity, human rights violations and abuses, or torture, cruel, inhuman, and degrading treatment. The suppliers we use have a longstanding status of reputable practices. In addition, on an annual basis we check the companies on the OFAC Sanction database to ensure there is no change within their status and they have not breached any of these policies.

GRIEVANCES

On receiving a complaint, we will explain our complaint procedure, aim to receive an accurate report of the complaint, learn how the complainant would like this situation resolved, identify actions we should take, monitor the situation, and advise the complainant of our final decisions. If we are not able to address the complaint internally, we may redirect the complaint to a relevant and affiliated source. We are also including verbiage on our website to allow anyone from outside the organization to report any grievances. At this time we have not received any grievances. All matters concerning this will be handled by Britt Elwell, Senior VP.

IDENTIFY AND ASSESS RISK IN THE SUPPLY CHAIN

We assess our own and suppliers' due diligence practices and those relating to human rights by only selling and purchasing precious metals that do not directly or indirectly support non-state armed groups. This includes, but not limited to, procuring precious metals from, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates.

We are on high alert in regards to bribery and fraudulent misrepresentation of the origin of precious metals. We will not offer, promise, demand, or give bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of precious metals.

Lastly, 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. During our assessment of our own and our suppliers' due diligence practices and those relating to human rights, we have not identified potential and actual risks within our supply chain.

ROBERTO COIN STRATEGY FOR ANY IDENTIFIED RISKS

Any and all findings from our internal team or outside organization will be reviewed by Britt Elwell, Senior VP. He will then present all occurrences to CEO/Owner Peter Webster and the Board. Roberto Coin will halt doing business with the individuals while the internal investigation is taking place and if the findings are proven to be true, Roberto Coin will cease doing business with these suppliers/vendors and report to RJC and Jewelers' Vigilance Committee.

To remedy any such risks, we will immediately stop engaging with the particular supplier if we find that they are abusing specific practices, such as:

- Forced or compulsory labor
- Any forms of child labor
- War crimes, violations of international humanitarian law, crimes against humanity
- Human rights violations and abuses
- Torture, cruel, inhuman, and degrading treatment.

We monitor and track the performance of risk mitigation by communicating monthly with our various suppliers. Roberto Coin Inc. makes sure their suppliers submit all necessary documentation to support that their origin and sourced materials have remained the same and if anything has changed, that they inform us immediately with proper backup documentation. Our risk assessment findings are received and reviewed by Britt Elwell, Senior VP.

RISK MANAGEMENT PLAN

To respond to the risks identified within our supply chain, we took the following steps to design and implement a risk management plan which consists of:

- Only using suppliers that have been proven to adhere to all the policies above
- Use the same suppliers consistently
- Properly vet any new supplier using the terms and guidelines listed above
- Terminate any and all relationships with any suppliers that violate these terms and conditions.

In addition, on an annual basis we check the companies on the OFAC Sanction database to ensure there is no change within their status and they have not breached any of these policies.

INTERNAL TRAINING

Roberto Coin Inc. provides training regarding human rights and our due diligence activities to our employees within 1 week of being employed at Roberto Coin or contracted for work by Roberto Coin. Each employee is taken through the policies that are listed in the Roberto Coin Employee Handbook by our HR Team. Any questions that employees have are addressed at that time or are addressed at any time during their employment. Each employee is required to sign the Employee Handbook stating that they have read through all the Roberto Coin policies and are aware of all the terms and conditions set forth by Roberto Coin Inc.

COMMUNICATION

Roberto Coin Inc. communicates to our stakeholders regarding our due diligence activities and efforts to prevent human rights risks. This communication is in the form of verbal communication at the Annual Shareholders Meeting. When a human rights risk is identified, we communicate the risk and how we are addressing it to potentially affected stakeholders by verbal communication at the Annual Shareholders Meeting followed up with an email confirmation to the Shareholders. In addition, we will include verbiage on our website about our Supply Chain and Due Diligence policies.

We publish an annual report to give to the Shareholders of our review process and any findings and grievances during that 12 month period. Since our last report, no grievances have been raised regarding human rights risks or our supply chain due diligence. This will take place at the end of 2023.