

FM Nelkin LLC

Responsible Sourcing Policy Statement

Effective Date: April 30, 2026

FM Nelkin LLC is a manufacturer of jewelry and precious metals products. By combining the talents and skilled craftsmanship of our manufacturing experts, we have developed proprietary techniques and equipment that make FM Nelkin LLC one of the most progressive, innovative, and respected manufacturers in our industry.

This Responsible Sourcing Policy confirms FM Nelkin LLC's commitment to respecting human rights, avoiding contribution to the financing of conflict, and complying with all applicable United Nations sanctions, resolutions, and relevant laws.

1. Responsible Jewelry Council Commitment

FM Nelkin LLC is a certified member of the Responsible Jewelry Council. As such, we are committed to demonstrating, through independent third-party verification, that we:

- a. Respect human rights in accordance with the Universal Declaration of Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work;
- b. Do not engage in or tolerate bribery, corruption, money laundering, or the financing 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 regarding the jewelry supply chain; and
- f. Implement the OECD Five-Step Framework as a management process for risk-based due diligence for responsible supply chains of materials from conflict-affected and high-risk areas.

2. Use of Influence

FM Nelkin LLC also commits to using its influence, where possible, to prevent abuses by others within the supply chain.

3. Serious Abuses Associated with Sourcing

Regarding serious abuses associated with the extraction, transport, or trade of gold, silver, platinum, diamonds, rubies, emeralds, and sapphires, FM Nelkin LLC will not tolerate, profit from, contribute to, assist with, or facilitate the commission of:

- a. Torture or cruel, inhuman, or 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.

4. Supplier Disengagement for Serious Abuses

FM Nelkin LLC will immediately stop engaging with upstream suppliers if we identify a reasonable risk that they are committing the abuses described above, sourcing from parties committing such abuses, or are otherwise linked to any party committing these abuses.

5. Direct or Indirect Support to Non-State Armed Groups

FM Nelkin LLC will not provide direct or indirect support to non-state armed groups or their affiliates through the extraction, transport, trade, handling, or export of precious metals or gemstones.

This includes sourcing precious metals, diamonds, rubies, sapphires, or emeralds from, making payments to, or otherwise assisting or equipping non-state armed groups or their affiliates that illegally:

- a. Control mine sites, transportation routes, points where precious metals and gemstones are traded, or upstream actors in the supply chain; or
- b. Tax or extort money, precious metals, or gemstones at mine sites, along transportation routes, at trading points, or from intermediaries, export companies, or international traders.

6. Supplier Disengagement for Armed Group Support

FM Nelkin LLC will immediately stop engaging with upstream suppliers if we identify 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 this policy.

7. Public or Private Security Forces

Regarding public or private security forces, FM Nelkin LLC affirms that the role of such forces is to provide security to workers, facilities, equipment, and property in accordance with the rule of law, including laws that guarantee human rights.

FM Nelkin LLC will not provide direct or indirect support to public or private security forces that commit abuses described in this policy or that act illegally in connection with the control, taxation, or extortion of mine sites, transportation routes, trading points, or upstream supply chain actors.

8. Bribery and Fraudulent Misrepresentation

FM Nelkin LLC 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 gemstones, or to misrepresent taxes, fees, and royalties paid to governments for the extraction, trade, handling, transport, or export of precious metals and gemstones.

9. Money Laundering

FM Nelkin LLC 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 and gemstones.

10. Diamond Sourcing

Regarding the sourcing of diamonds, FM Nelkin LLC confirms that all diamonds in our supply chain are sourced in accordance with the Kimberley Process Certification Scheme, the World Diamond Council System of Warranties, and applicable national laws.

We require our diamond suppliers to adhere to the Kimberley Process Certification Scheme, the World Diamond Council System of Warranties, and all applicable legal requirements. We further require that our suppliers source exclusively from actors operating under these standards and guidelines.

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