




PR-MM-002

Supply Chain Due Diligence Procedure

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| Created By : Stock Manager | Reviewed By : Plating Manager | Approved By : Production Manager |
| Signature :  | Signature :  | Signature :  |
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| Date : 16 Sep 2022 | Date : 16 Sep 2022 | Date : 16 Sep 2022 |

1. Purpose

The purpose of this document is to outline the steps that need to be carried out as part of our supply chain due diligence with regards to human rights and ethical sourcing. For the purposes of human rights due diligence these procedures must be carried out with all suppliers and whenever gold, silver or platinum group metal are being sourced in the form of raw material, sub-assemblies or finished products this protocol will be extended to our supplier's suppliers until we identify and evaluate the refiners in the supply chain.

2. Procedure

Step 1

Contact suppliers and request for external audit results regarding sourcing and human rights topics and in the case of precious metal suppliers also ask for the identity of their upstream precious metal refiners. If the supplier is unaware or unwilling to disclose the required information, attempt to create a mutually agreeable proposal for how the information may be gathered and shared.

Step 2

Having collected relevant documents, use them to assess the supplier for actual or potential human rights risks. In the case of precious metal suppliers, after upstream refiners have been identified gather information pertaining to the refiner's due diligence process and check against the OECD due diligence framework to see if it is sufficient and satisfactory. In both cases, if satisfactory and a responsible level of due diligence regarding human rights and ethical sourcing of raw materials is shown, proceed to step 4. However, in the event of a red flag where human rights may have been violated or materials were sourced or transported through CAHRAs. Enhanced engagement with our relevant direct supplier needs to be initiated.

In order to comply with SRSP ensure that our upstream refiners of Gold, Silver and PGM have been audited and accredited by one of the following standards:

- LBMA silver or gold
- SCS Global Services' Responsible source standard
- The Chain Chamber of Commerce of Metals Minerals and Chemicals Importers and Exporters (CCCMC) Guidelines
- DMCC Dubai good delivery list for gold
- CRAFT code for artisanal and small-scale mining
- The Fairtrade Gold Standard through registered refineries
- The Responsible Mineral Initiative (RMI)
- The Responsible Mineral Assurance Process (RMAP)
- Responsible Jewellery Council (RJC CoC)
- Organisation for Economic Co-operation and Development (OECD) due diligence guidelines

Step 3

Begin by sending out and requesting replies for:

- ELF Supplier self-assessment
- Conflict mineral policy acknowledgement
- Business code of conduct acknowledgement

Any documents gathered within the last 3 years from the supplier in question can be used for the purposes of evaluation. Review the responses given to these documents and assess for ethical sourcing and human rights violation risks. Red flags need to be assessed for the severity of the potential or real risks. For the most severe cases immediate disengagement with the relevant direct supplier may be necessary. Where possible preventative and mitigating measures can be put in place in order to continue the relationship with the relevant direct supplier.

Step 4

Annually review due diligence and information collection procedures. Streamline where possible to ensure only relevant and important information is being collected. Where needed introduce extra steps in order to conclude with confidence that our supply chain is in fact ethical.

Step 5

- Report annually:
- Our supply chain policy
- Due diligence procedure
- Assessment of refiner's due diligence procedures
- Identified risks both real and potential
- Prevention and mitigation efforts of risks
- Progress report 6 months after initial engagement

The responsibility of carrying out the supply chain due diligence will fall upon Mr. Paul Philip Evans (paul@elf925.com) and Miss Nareewan Cheejaiarn (nareewan@elf925.com) our Purchasing Manager and Human Resources Manager respectively as they are the most qualified and relevant to the task.

3. Review Procedure

This document will be reviewed as part of the annual policy and procedure review.