



6 East 45<sup>th</sup> Street, Floor 17. New York, NY 10017  
P: 212-682-4788 [www.colormerchants.com](http://www.colormerchants.com)

## CORPORATE SOCIAL RESPONSIBILITY POLICY

This document formulates Color Merchants Inc.'s (CMI) corporate responsibility policy, adopted for the benefit of our customers, our employees, and civil society as a whole. CMI Corporate Responsibility Policy applies to all CMI staff and all CMI entities, regardless of size, activity, or location. The Policy applies equally to CMI supply chain and to all suppliers who contribute to their manufacturing. CMI is committed to continuously improve its ethical, social and environmental performance, with the aim to achieve full conformance with the terms of this Policy.

Our vision is defined by the values which underpin our history and determine our future: We are conscious of our heritage and take ownership for our corporate actions. We demand the very best of ourselves, as do our customers. Our customers honor us with their trust. Through our work behavior and commitment, we endeavor to deserve this trust each passing day.

**Signed:** *Jordan Peck*

**Title:** Vice President

**Date of Effect:** 3/18/2020





6 East 45<sup>th</sup> Street, Floor 17. New York, NY 10017  
P: 212-682-4788 [www.colormerchants.com](http://www.colormerchants.com)

## THE PRINCIPLES

### **Business Ethics:**

1. We are committed to conducting our businesses to a high ethical standard, and to ensuring integrity, transparency and conformance with applicable law.
2. We are not engaged in bribery and/or corruption.
3. We do not tolerate money laundering and/or financing of terrorism.
4. We adhere to the Kimberley Process Certification Scheme and the World Diamond Council voluntary system of warranties, whose purpose is to put an end to conflict diamond trade and support similar future initiatives aiming to protect human rights and the integrity of our supply chain.
5. We disclose the material characteristics of the products that we sell.
6. We do act in accordance with antitrust regulations.

### **Social Performance:**

7. We believe in and do respect the fundamental human rights and the dignity of the individual, according to the United Nations Guiding Principles on Business and Human Rights and Universal Declaration of Human Rights.
8. We do not tolerate the use or support child labour.
9. We do not use or support any type of forced or bonded labour, including slavery, prison labour, as well as indentured labour and labour as a punishment for expressing political view; nor do we restrict the freedom of movement of employees and dependents.
10. We are committed to high standards of health and safety in our operations.





6 East 45<sup>th</sup> Street, Floor 17. New York, NY 10017  
P: 212-682-4788 [www.colormerchants.com](http://www.colormerchants.com)

11. We do not prevent workers from associating freely. Where laws prohibit these freedoms, we do support parallel means of dialogue.
12. We do not discriminate based on race, ethnicity, caste, national origin, religion, disability, HIV status, migrant status, gender, sexual orientation, union membership, political affiliation, marital/parental status, physical appearance, age, or any other applicable prohibited basis in the workplace.
13. We do not use corporal punishment under any circumstances and do prohibit the use of degrading treatment, harassment, abuse, coercion or intimidation in any form.
14. We do adhere to working hours and remuneration legislation, or, where no such legal requirements have been established by law, the prevailing local industry standards.
15. We do take reasonable measures to ensure the physical integrity and security of our employees and product shipments.
16. We do support the development of communities linked to our own activities, contributing to their social and economic welfare.
17. We do recognize and respect the rights of indigenous peoples and the value of their traditional, cultural and social heritage.

**Environmental Performance:**

18. We do conduct our businesses in an environmentally responsible manner.
19. We do manage our environmental footprint by eliminating or minimizing negative environmental impacts resulting from our operations.





6 East 45<sup>th</sup> Street, Floor 17. New York, NY 10017  
P: 212-682-4788 [www.colormerchants.com](http://www.colormerchants.com)

20. We do ensure the efficiency of our business operations by managing our waste and our use of water and energy.

***Principle 1 - We are committed to conducting our businesses to a high ethical standard, and to ensuring integrity, transparency and conformance with applicable law.***

- We do comply with the applicable laws and regulations relating to our activities and the countries in which we operate.
- We do strive for continuous improvement of this policy and standards as a means to support the principles we uphold.
- We do communicate our responsible vision and policy throughout our organization and to our business partners. We do make our policy available to all key stakeholders.
- We do continue to require high standards within our supply chain in relation to business ethics, and to align our purchasing policy with our business ethics commitments to the fullest extent possible.

***Principle 2 - We are not engaged in bribery and/or corruption***

- We do prohibit bribery and corruption in all business transactions carried out by ourselves or through business associates, as such that may compromise the principles of fair competition or constitute an attempt to obtain or retain business or influence the course of the business or governmental decision-making process.





**BREVANI**

a division of Color Merchants

6 East 45<sup>th</sup> Street, Floor 17, New York, NY 10017

P: 212-682-4788

[www.colormerchants.com](http://www.colormerchants.com)

- We do not allow any employee to suffer negative consequences for voicing a concern or refusing to engage in an act of bribery.
- We do prohibit acceptance by ourselves as a company, or by any of our employees, of payments, gifts in kind, expenses, discounts, advantages or promises such that may influence the course of our business decisions.

***Principle 3 - We do not tolerate money laundering and/or financing of terrorism***

- We do comply with the applicable national and, where appropriate, international accounting and banking standards and processes (such as independent auditing).
- We do comply with national and, where relevant, international and transnationally applicable law with respect to money laundering, financing of terrorism, fraud, and other illegal activities.
- With respect to the above-mentioned issues, we do ensure that our employees are aware of applicable rules and regulations and of company policy and that they are kept abreast of their evolutions.

***Principle 4 - We adhere to the Kimberley Process Certification Scheme (KPCS) and the World Diamond Council voluntary system of warranties, whose purpose are to put an end to conflict diamond trade, and support similar future initiatives aiming to protect human rights and the integrity of our supply chain.***

- We do not buy conflict diamonds or assist others to do so.
- Our diamond purchases are made in accordance with the KPCS and system of warranties. A supplier statement of warranty is required on all invoices concerning diamonds received by CMI.
- We do keep invoices received, pertaining to the purchase of diamonds, for a



**The Plumb Club**  
EDUCATE. INNOVATE. CONNECT.



6 East 45<sup>th</sup> Street, Floor 17, New York, NY 10017  
P: 212-682-4788 [www.colormerchants.com](http://www.colormerchants.com)

minimum period of 5 years for audit and reconciliation purposes.

- We do suspend any supplier relationship in which our supplier is suspected of being involved in conflict diamond trade until we obtain assurances that no such trade dealings are taking place, or that such dealings were taking place without knowledge on the part of the supplier and that the supplier has taken all appropriate measures to end such dealings.
- We do terminate any supplier relationship in which our supplier is found to be knowingly involved in conflict diamond trade and will reserve the right to prosecute the supplier accordingly.
- We do ensure that company employees that buy or sell diamonds are well informed about the Kimberley Process, government restrictions on the trade in conflict diamonds and their duty to abide by CMI policy requirements. We will regularly update our staff on the issue of conflict diamonds and CMI policy in respect to diamond purchasing.
- Beyond the Kimberley Process and the voluntary system of warranties adopted by the diamond industry, we do support and do implement any further procedures or processes agreed together by the diamond industry, governments, and civil society representatives aiming to put an end to trade in conflict diamonds.
- We will play a proactive role to encourage and support similar endeavors, for instance in the area of gemstones and precious metals and, to this effect, will engage with others in order to define and promote appropriate measures.

***Principle 5 - We disclose the material characteristics of the products that we sell***

- We do comply with the relevant trading standards legislation, and where they





6 East 45<sup>th</sup> Street, Floor 17, New York, NY 10017  
P: 212-682-4788 [www.colormerchants.com](http://www.colormerchants.com)

exist, specific national regulations and generally accepted industry guidelines applicable to the types of products we sell.

- We do disclose, to our clients and prospective clients, relevant information on the material characteristics of our products, such as, for diamonds: weight, cut, color, clarity and metals: type, alloy and weight in accordance with recognized national and international guidelines.
- We do not make any untruthful, misleading, or deceptive statements, representations, or material omissions in the promotions or advertising of our products.
- We adhere to high standards of product quality and safety.
- We do ensure adequate training of our staff on our history, heritage, products, and policies in order for them to provide full customer experience and reliable information to clients and prospective clients.

### ***Principle 6 - We do act in accordance with anti-trust regulations***

- We do comply with applicable anti-trust laws and regulations.
- We do not seek to make use of our membership in trade organizations to obtain or exchange commercially sensitive information in contradiction to competition laws and regulations.

### ***Principle 7 - We believe in and do respect the fundamental human rights and the dignity of the individual, according to the United Nations***

#### **Declaration of Human Rights and the United Nations Guiding Principles on Business**

- We do uphold the United Nations Universal Declaration of Human Rights within our operations and in relation to our business partners.





6 East 45<sup>th</sup> Street, Floor 17. New York, NY 10017  
P: 212-682-4788 [www.colormerchants.com](http://www.colormerchants.com)

***Principle 8 - We do not tolerate the use or support of child labour, adopting the definition of 'child labour' as set out in the UN International Labour Organisation Minimum Age Convention 1973 (No.138)***

- We do not, in any country, engage in the employment of children.
- We do not employ young persons, younger than 18, and all employment is conducted in accordance with applicable law.
- We consider that standard employment within our entities should in general be between the ages of 18 and 65, subject to applicable law.
- We require that our business partners who provide us with products and/or services comply with the child and young person's employment guidelines agreed by the Council for Responsible Jewellery (now RJC) Practices.

***Principle 9 - We do not use or support any type of forced or bonded labour, including slavery, prison labour, as well as indentured labour and labour as a punishment for expressing political views; nor do we restrict the freedom of movement of employees and dependents.***

- We do adhere to applicable employment laws and regulations.
- We do ensure that all work performed on behalf of ourselves within our operations is based on recognized employment relationships.
- We do not retain originals of employee personal documentation (such as identity papers), nor require any form of deposit or fee as a condition of the recruitment or employment.
- We do require the same commitments from our business partners who provide us with products and/or services.







6 East 45<sup>th</sup> Street, Floor 17. New York, NY 10017  
P: 212-682-4788 [www.colormerchants.com](http://www.colormerchants.com)

## ***Principle 10 – We are committed to high standards of health and safety in our operations***

- We do provide safe and healthy working conditions for all employees in accordance with applicable laws and regulations.
- We do take appropriate measures to prevent accidents, injury, and health problems arising from or linked to the course of work activities, in our operations.
- We do ensure that employees are aware of specific role-related health and safety risks and hazards, methods for appropriate protection from such hazards, and action to be taken in the event of an accident.
- We do ensure that our workplaces constitute adequate working environments in accordance with required standards (lighting, ventilation, air quality, noise levels and temperature).
- We offer workplaces which are adequately constructed and maintained to meet local building regulations.
- We ensure employees have access to a mechanism by which they can raise and discuss health and safety issues with management.
- We do monitor health and safety issues and adequately address such issues that arise.
- We do provide our employees with clear, understandable information on health and safety, as well as with relevant training, updated on an adequate basis.
- We do ensure that appropriate measures are employed to minimize the risk of employee contact with hazardous substances, through the use of protective equipment and gear, the use of appropriate containers, and posting of safety notices.
- We do not make use of substances that are subject to national or international bans for their adverse effects on humans or the environment.





6 East 45<sup>th</sup> Street, Floor 17. New York, NY 10017  
P: 212-682-4788 [www.colormerchants.com](http://www.colormerchants.com)

- We require our business partners who provide us with products and/or services to comply with the above-mentioned commitments and, where appropriate, provide them with assistance in meeting these standards.

***Principle 11 – We do not prevent workers from associating freely. Where laws prohibit these freedoms, we do support parallel means of dialogue***

- We do adhere to applicable law and collective bargaining agreements where such agreements exist.
- Where such agreements do not exist, we do support the implementation of collective employee representation and robust and effective dialogue between management and employees.
- We do require our business partners who provide us with products and/or services to comply with the above-mentioned commitments.

***Principle 12 - We do not discriminate based on race, ethnicity, caste, national origin, religion, disability, HIV status, migrant status gender, sexual orientation, union membership, political affiliation, marital/parental status, physical appearance, age, or any other applicable prohibited basis in the workplace***

- We do not practice or condone any form of discrimination in the workplace on these bases.
- We do observe the right to freedom of practice by employees of religious or cultural practices, as far as is reasonable.
- We do provide appropriate training to our employees on a continued basis, in order for them to acquire, maintain and further the skills which will provide them with access to career opportunities.





**BREVANI**

a division of Color Merchants

6 East 45<sup>th</sup> Street, Floor 17. New York, NY 10017

P: 212-682-4788

[www.colormerchants.com](http://www.colormerchants.com)

- We do require our business partners who provide us with products and/or services to comply with the above-mentioned commitments.

***Principle 13 – We do not use corporal punishment under any circumstances and do prohibit the use of degrading treatment, harassment, abuse, coercion or intimidation in any form***

- We do not make use of or condone such practices.
- We clearly communicate applicable disciplinary processes and procedures to our employees.
- We do ensure that grievance procedures and investigation processes are in place and are communicated to all employees.
- We do require our business partners who provide us with products and/or services to comply with the above-mentioned commitments.

***Principle 14 – We do adhere to working hours and remuneration legislation, or, where no such legal requirements have been established by law, the prevailing local industry standards***

- We do ensure that normal working hours comply with national legislation and shall not on a regular basis exceed a maximum of 48 hours per working week.
- We do provide weekly rest and paid annual leave in accordance – at a minimum – with national legislation and applicable sector regulations.
- We do abide by all legally mandated provisions for leave, including maternity/paternity, and compassionate leave.
- We do ensure that employees are paid with due regard to industry standards and at least according to the applicable legal minimum wage and record of payment (wage slip) compliant with national regulations.



**The Plumb Club**  
EDUCATE. INNOVATE. CONNECT.



6 East 45<sup>th</sup> Street, Floor 17. New York, NY 10017  
P: 212-682-4788 [www.colormerchants.com](http://www.colormerchants.com)

- We do not make illegal deductions from wages for disciplinary purposes.
- We do ensure fair terms and conditions to our business partners who provide us with products and/or services, to the best of our ability, including sufficient notice on planning schedules and payment within an agreed and reasonable timeframe.

***Principle 15 – We do take reasonable measures to ensure the physical integrity and security of our employees and product shipments***

- We do take appropriate measures to ensure the physical integrity and security of our employees dealing with valuables (product components, semi-finished and finished products) in our operations and during transportation to or from our operations.
- We do ensure that all security personnel respect the human rights and dignity of all people and use the minimum force proportionate to the threat.
- We do take appropriate measures to ensure the physical integrity and security of valuables (product components, semi-finished and finished products) in our operations and during transportation to or from our operations.

***Principle 16 – We do support the development of communities linked to our own activities, contributing to their social and economic welfare***

- We endeavor to develop programs supporting communities historically involved in our supply chain, with the aim to contribute to their social and economic welfare.
- We encourage our employees in their involvement in community programs aiming at bettering society and support them where appropriate.





**BREVANI**

a division of Color Merchants

6 East 45<sup>th</sup> Street, Floor 17. New York, NY 10017  
P: 212-682-4788 [www.colormerchants.com](http://www.colormerchants.com)

***Principle 17 – We do recognize and respect the rights of indigenous peoples and the value of their traditional, cultural and social heritage***

- We do require of our business partners who provide us with products and/or services that they recognize and respect the rights of indigenous peoples and the value of their traditional, cultural and social heritage.

***Principle 18 – We do conduct our businesses in an environmentally responsible manner***

- We do ensure compliance of our sites with relevant legal requirements, environmental norms and specific industrial environment regulations and have appropriate mechanisms in place to keep management and key staff up to date.
- We do comply with applicable conventions and regulations regarding the protection of endangered species.
- We seek to minimize the use of hazardous substances in production processes and use alternatives wherever technically feasible and possible.
- We seek to minimize the quantity of hazardous waste produced through our operations.
- We ensure that hazardous waste substances arising from operations are disposed of in a manner which prevents pollution of the surrounding land, water resources and atmosphere.
- We encourage continuous improvement within our supply chain in relation to environmental performance, and seek to align our purchasing policy with our environmental commitments.

***Principle 19 – We do manage our environmental footprint by eliminating or minimizing negative environmental impacts resulting from our operations***

- We seek to factor appropriate environmental considerations into the



**The Plumb Club**  
EDUCATE. INNOVATE. CONNECT.



6 East 45<sup>th</sup> Street, Floor 17. New York, NY 10017  
P: 212-682-4788 [www.colormerchants.com](http://www.colormerchants.com)

development of our processes, technologies, products and packaging in order to optimize environmental performance.

- We ensure that facilities managers are aware of specific pollution risks, methods for appropriate prevention, and action to be taken in the event of an incident.

***Principle 20 – We do ensure the efficiency of our business operations by managing our waste and our use of water and energy***

- We do take steps to reduce the quantity of general waste produced from our operations through the principles of reduce, recover, re-use and recycle.
- We do take steps to reduce the quantity of water and energy consumed in our operations.
- We do seek to implement practices that reduce use of fossil fuels and associated greenhouse gas emissions from transportation.

