

REPORTING REQUIREMENTS FOR COP 7



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COP 7: DUE DILIGENCE
Contact Information

COMPANY NAME: M Geller Ltd

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REPORTING PERIOD: FY23 (07/1/22 – 06/30/23)

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M Geller Ltd have the following policies, “Code of Practices” guidelines, “Due Diligence” letter, “Supply Chain” policy and the “Supply Chain” Questionnaire in place regarding our supply chain of diamonds/gold/PGM/colored gemstones originating from conflict-affected and high-risk areas. Our policy correspondence is communicated to our suppliers yearly by email and can be accessed via our website, www.mgellerdiamonds.com.

To support supply chain due diligence, we have implemented the following internal measures, such as, these policies and the requisite forms are reviewed and updated annually as necessary to remain in compliance. The senior manager who is responsible for overseeing supply chain due diligence is Louis Price, CEO. The Policy letters and/or Questionnaire are stored in the business office, posted within an excel spreadsheet and within the accounting program, Quickbooks.

M Geller Ltd has established a system of controls and transparency over our supply chain, which includes our approach for identifying suppliers through the AML requirements and identifying their sources of diamonds/gold/PGM/colored gemstones through the Supply Chain Questionnaire. We assess the answers given about our supplier’s sources, against such websites as OECD.org, RULAC.org and ACAPS.org. These methods have strengthened our due diligence efforts by allowing us to determine the Risk levels of our suppliers.

As a company we communicate our expectations regarding supply chain due diligence via email correspondence and on our website, www.mgellerdiamonds.com. In addition to this, we also take the following steps to strengthen our engagement with suppliers, such as one on one meetings with suppliers and the owner, Marc Geller; the outcome of doing this has been especially important in conveying our commitment to the RJC standards of practice. Our suppliers must participate in our vendor approval program that requires signed agreements confirming that all diamonds presented to us for purchase are Kimberley Process guaranteed. In addition, our suppliers must pledge to comply with our exacting standards for human rights and fair labor practices.

Our grievance mechanism for complaints can be accessed by viewing “Our Grievance Policy and Complaint form” on the www.mgellerdiamonds.com website in the “Our Policies” page. The employee responsible for the grievance mechanism is Louis Price, CEO. Louis Price can be directly reached by email at lprice@mgellerdiamonds.com.

We assess our supplier’s due diligence practices by requiring all suppliers to fill out our “Due Diligence” policy letter. During our assessment of our supplier’s due diligence practices, we can identify the potential and actual risks within our supply chain. For example, we can identify a possible red flag or risk in the supply chain, when a supplier lists a source country that is actively engaging in high conflict as shown by the RULAC.org website.

The senior manager who will receive the findings of our risk assessment is Louis Price, CEO, and is assisted by the head of the business office, Barbara Doherty.

To respond if there are any risks identified within our supply chain, we will take the following steps to design and implement a risk management plan. Foremost, we require our suppliers to fill out the Supply Chain questionnaire, Code of Practices paperwork, Due Diligence letter, and AML paperwork. The risk management plan consists of the following, first gather the information mentioned above, review the paperwork with management, check the OFAC website, compare source information to various websites on conflict, governance, and human rights violations. In case risks are identified, the suppliers will be contacted, and senior management will collaborate with those suppliers to mitigate the breaches, re-evaluate if there is improvement

of the identified risk after six months, follow up on any complaints and/or grievances or cease to do further business with them.

To implement our risk management plan, we have taken the following risk mitigation steps, reviewed the relevant websites and assigned a risk level for all suppliers. We continue to monitor the plan and track the effectiveness of these risk mitigation measures by updating our website and following recommendations by the RJC. M Geller Ltd strives to remain informed on current issues and events related to our industry through news briefs and webinars offered by such organizations including the Responsible Jewelry Council, Jewelers Vigilance Committee, ACAPS, the U.N. Commission on Human Rights, the Kimberly Process Certification Scheme, and more.

M Geller Ltd provides the training regarding our due diligence activities to our employees on an annual basis. This training included information on changes, recent accomplishments, and goals for the new year including applicable laws, company policies and procedures, product disclosures, office safety protocols, labor issues, and an ongoing understanding of the responsible “mindset” required in all areas of M Geller Ltd.’s business and operations. We are committed to monitoring and improving our performance, reducing environmental impacts, incorporating supply chain risks into our business decisions, and increasing employee awareness and training. For our business to exercise responsible management, we know that we must proactively communicate these measures to every member of our team, as well as to our suppliers and customers.

M Geller Ltd communicates to our stakeholders and our suppliers our views regarding our due diligence activities. This communication is in the form of email correspondence and our website. We recognize that it is vital for us to come to terms with the significant risks associated with the extraction, trading, handling, and exporting of minerals from Conflict-Affected and High-Risk Areas (CAHRAs). CAHRA’s are identified based primarily on human rights threats associated with labor conditions, abusive governance, conflict, or mineral flows where undeclared high-risk sources may enter a supply chain. Accordingly, we have implemented a thorough risk-assessment management system for responsible sourcing of minerals from these areas and have established policies that we widely disseminate and incorporate in agreements with suppliers.

Since our last report, no grievances have been raised regarding human rights risks or our supply chain due diligence.

M Geller Ltd joined the RJC in 2019 and has since achieved 1 certification. Our Certified number is 00001712.

In support of our continuous improvement journey, our latest third-party RJC audit took place within our organization against the RJC COP 2019 on June.2023.