

WATCH & JEWELLERY INITIATIVE 2030

DUE DILIGENCE POLICY AND PROTOCOL

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1. Introduction

- 1.1. Founded by Kering and Cartier, the Watch and Jewellery Initiative 2030 (“**WJI 2030**”) is a Swiss non-profit association guided by the Ten Principles of the United Nations Global Compact and the 17 Sustainable Development Goals (“**SDGs**”). WJI 2030 has set ambitious goals to accelerate positive impact in three areas: building climate resilience, preserving resources, and fostering inclusiveness, through the collective effort of Maison's, their suppliers and business partners and in collaboration with key stakeholders.
- 1.2. WJI 2030 will pursue its goals in accordance with its Articles of Association, Code of Conduct, Anti-trust Policy and with any other policy it may develop and adopt from time to time.
- 1.3. This document sets the process to be followed by the Watch & Jewellery Initiative 2030 (“**WJI 2030**”) when conducting due diligence (“**DD**”) on applicants and members. It is not an investigation into, or an audit of the company's business practices.
- 1.4. DD is carried out for the purposes of gaining a clear understanding of the potential member and determining any associated risks in order to safeguard the integrity and reputation of WJI 2030, while also reducing the risk of accepting members that are not committed to WJI 2030's values and vision.

2. Due Diligence Scope

- 2.1. DD shall include research in relation to a number of factors including (but not limited to):
 - Industry reputation, negative press media;
 - Economic and trade sanctions;
 - KYC/Anti-Money Laundering (AML), Politically Exposed Persons (PEPs), Corruption;

WATCH & JEWELLERY

INITIATIVE 2030

- Operations in Conflict affected and high-risk areas;
- Human Rights related issues;
- Environmental concerns;
- Social concerns; and
- Publications by the entity.

3. Due Diligence Process

- 3.1. DD comprises an internal due diligence check using a specialized due diligence external tool, and where necessary, an additional/enhanced due diligence search carried out by an independent third party if deemed necessary.
- 3.2. The Governance Manager shall ensure that all relevant information has been received. All applications for Membership shall be sent to the Governance Manager who will review the applications for completeness as per the Membership Procedure. If/when the application is considered complete, the Governance Manager will conduct a due diligence check.
- 3.3. The Governance Manager will utilize Lexis Nexis Diligence to conduct the initial due diligence screening. Only when and if there are red flags determined through the use of the tool, will the Governance Manager create a report using Lexis Nexis, to be shared with the Risk & Compliance Committee for their review.

4. Types of Due Diligence

- 4.1. Due diligence is undertaken at several stages by the WJI 2030.
 - A. *Initial Due Diligence*
- 4.2. The Initial Due Diligence is the DD that is carried out after an application is submitted.
- 4.3. Following the completion of the screening through Lexis Nexis Diligence, where no adverse information related to the risk factors is found, the Governance Manager will inform the Executive Director who will submit the application to the Board as per the Articles of Association and the Membership Procedure.
- 4.4. Following the completion of the screening through Lexis Nexis Diligence, where adverse information related to the risk factors is found, the Governance Manager will inform the Executive Director and submit the DD report to the Risk & Compliance Committee for an independent third-party assessment. If the Assessment is satisfactory then the application will be submitted to the Board. If the Assessment is not successful, the application will be denied.
- 4.5. The unsuccessful applicant will only be able to submit a new application after 1 year from the date its initial application has been rejected and will have to complete the

WATCH & JEWELLERY

INITIATIVE 2030

entire application and DD process again. The new application will be managed by the Risk & Compliance Committee.

B. On-going Due Diligence

- 4.6. The DD process shall be renewed at least once a year for all members to ensure continued compliance. This will be conducted by the Governance Manager.

C. AD HOC Due Diligence

- 4.7. If the WJI 2030 has concerns or an issue is brought to its attention (e.g. through the Grievance and Complaints Mechanism), or finds it lacks sufficient information or documentation concerning a Member, it may mandate an ad hoc review of the Member / issue – using the same process as for the WJI 2030 Grievance and Complaints Mechanism.

D. Negative information or incident

- 4.8. Any negative information or news stories on any member or potential member which cannot be verified by the Governance Manager shall be escalated immediately to the Risk & Compliance Committee.
- 4.9. Should the review of the negative information / story or incident determine an issue involving a member, WJI 2030 may mandate a further investigation by Sigma Legal or another third party depending on the nature of the issue. If this additional investigation determines there is actually no issue, no further action will be needed. The corresponding report and information will be stored in the relevant file.
- 4.10. If the additional investigation determines that the issue is confirmed, WJI 2030 shall take appropriate action including, but not limited to:
- Requesting further information from the member;
 - Rejecting the application for Membership;
 - Further escalation; and
 - Suspension or revocation of the member as per the Membership Procedure and Articles of Association.

5. Documentation

- 5.1. All external screening shall be summarized in a report.
- 5.2. All relevant information shall be kept for at least 5 years, in a safe and confidential manner.
- 5.3. Access shall be on a must have basis only, with due consideration for the sensitive nature of the information and for anti-trust.

WATCH & JEWELLERY INITIATIVE 2030 ****

Approved by the Board on 15.12.22

Entry into force 15.12.22