

WATCH & JEWELLERY INITIATIVE 2030

GRIEVANCE AND COMPLAINTS MECHANISM

DOCUMENT NAME:	Grievance and Complaints Mechanism
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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 Maisons, their suppliers and business partners and in collaboration with key stakeholders.
- 1.2. WJI 2030 will pursue its goals in accordance with its Statutes, Code of Conduct, Anti-trust Policy and with any other policy it may develop and adopt from time to time.
- 1.3. WJI 2030 has established a **Grievance & Complaints Mechanism**, as per the present policy, in order to hear and address complaints ("**Complaints**") on grievances and concerns ("**Concerns**") about WJI 2030 or its activities, and to provide a transparent and consistent process for addressing such Complaints.
- 1.4. WJI 2030's Board is responsible for adopting and reviewing this policy and related procedure and to oversee its implementation.

2. Scope (Concerns)

- 2.1. Concerns can be raised in relation to breaches, misuses or non-compliance of the following WJI 2030 procedures and governance policies:
 - Statutes;
 - Code of Conduct;
 - Membership Procedure and requirements;
 - WJI 2030's intellectual property (e.g., logo, WJI 2030 publications); and

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- Mission and Goals of WJI 2030.

3. Who can raise concerns

- 3.1. Employees of WJI 2030, members, applicant members, WJI 2030 partners or any other external stakeholder may raise Concerns in relation to issues mentioned under article 2 above (, the "**Complainant**").
- 3.2. WJI 2030 will not take directly or indirectly any action in retaliation in any way or otherwise discriminate against any Complainant who lawfully and in good faith raises a Concern through the present Grievance & Complaints Mechanism.
- 3.3. WJI 2030 will treat the identity of the Complainant and the content of its Complaint with the highest standards of confidentiality and protection of personality rights. If, for the purposes of conducting the investigation, the identity of the Complainant must be disclosed, WJI 2030 will first seek the authorization of the Complainant. If the Complainant does not agree, then the Complaint may be stopped and dismissed.

4. How to raise concerns (Complaint)

- 4.1. Concerns can be raised via email to:

WJI2030 Governance Manager
Address: Maison de la Paix, Chemin Eugène-Rigot 2, 1202 Genève
Email: compliance@wjinitiative2030.org

or by using the form in *Appendix 1*, emailed to compliance@wjinitiative2030.org.

5. Information to be provided in a Complaint

- 5.1. A detailed description of the facts incriminated must be provided (dates, concerned individuals, etc.) and supporting evidence should be provided when filing a Complaint.
- 5.2. The initial description and evidence will be used to assess the eligibility of the Complaint in a first stage, and then to investigate the Complaint in a second stage.
- 5.3. Such evidence may take the form of written information, records, observations, personal knowledge and/or statements, etc.
- 5.4. Providing contact information allows for further and faster follow up and are encouraged. However, Concerns can also be raised anonymously and will be treated in the same way, in accordance with this procedure.

6. Assessing eligibility of Complaints

- 6.1. Upon receiving a Complaint, WJI 2030 will:

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- Acknowledge receipt to the Complainant as soon as possible / within 3 business days;
 - Aim to assess the eligibility of the Complaint within 15 business days by evaluating the supporting evidence submitted; and
 - Inform the Complainant of the outcome of the eligibility assessment. If the information provided is not sufficient, WJI 2030 will seek further information where possible and appropriate from the Complainant. If no additional information is received within 15 days from the filing, the Complaint will be dismissed or transferred to a competent authority if required by its content.
- 6.2. Any Complaint that does not fall within the scope described in Article 2 above will be dismissed.
- 6.3. WJI 2030 cannot deal with matters that are currently before a court or an authority, or that have already been settled by a court or an authority.
- 6.4. A Complaint must be lodged as soon as possible after the date of acknowledgement of the facts on which the Complaint is based.
- 6.5. Complaints filed in bad faith, that are trivial or vexatious will be dismissed.

7. Managing Complaints:

- 7.1. Once a Complaint has been considered eligible, WJI 2030 will:
- Start the investigation into the Complaint;
 - Obtain additional information from Complainant if necessary;
 - Contact, provide necessary details of the Complaint, and hear the individual targeted by the Complaint, if any (the "**Respondent**") and any other party that WJI 2030 may deem useful or necessary;
 - Identify any additional actions to be taken;
 - Monitor the situation as warranted by the circumstances;
 - Maintain dialogue with the Respondent and the Complainant;
 - Keep the Complainant informed of progress, decisions or outcomes;
 - Maintain and update internal complaints register, in respect of data protection regulations; and

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- Keep records on Complaints received and the internal process followed, in accordance with Article 10 below.
- 7.2. WJI 2030 will endeavor to carry the investigation within a reasonable timeframe from the date of the assessment of eligibility. Certain situations may be complex and require in-depth research or may involve contacting remote stakeholders. This is likely to increase the investigation time required.
- 7.3. In cases where WJI 2030 cannot handle an eligible complaint internally (*e.g.*, if it does not have sufficient resources or expertise, or if it is too distant from the origin of the issue raised in the Complaint), it may decide to appoint an independent expert or suggest to the Complainant to address its Complaint to the appropriate entity, institution or authority.

8. Outcome of investigations

8.1. Once the investigation of a Complaint is fully completed, WJI 2030 will:

- Inform the Complainant of the outcome;
- Inform the Respondent of the outcome;
- Take any relevant action, if applicable;
- If appropriate, refer the matter to another entity or authority; and
- Close the file, as applicable.

9. Confidentiality and Data Protection

- 9.1. Complaints and any information provided by Complainants to WJI 2030 form will be treated as confidential and will be used for the sole purposes of processing the Complaint. The Complaint will be reviewed by WJI 2030 and external provider to the extent necessary.
- 9.2. This information will not be disclosed or released to any other third party unless such information is absolutely required to be disclosed upon a court, governmental or other authority or regulatory body order, mandatory provision of law.
- 9.3. Personal data that the Complainant may share with us will be collected, processed and stored in accordance with applicable data protection rules and regulation, in particular the Swiss Federal Act on Data Protection, as well as the European General Data Protection Regulation (GDPR).
- 9.4. In accordance with these applicable laws, the data subject has a right to access its personal data, and/or to request its rectification, limitation, portability and deletion. In

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order to exercise these rights, as well as for any question related to personal data, data subjects may contact privacy@wjinitiative2030.org.

- 9.5. Further information on privacy, data protection and related rights may be found on our website at <https://www.wjinitiative2030.org/privacy-notice/>.

10. Reporting & Transparency

- 10.1. WJI 2030 Risk & Compliance Committee will report regularly to the Board.
- 10.2. As part of its annual communication on progress, WJI 2030 will report publicly on the Complaints received, their number, topics raised and how the Complaint has been/is being dealt with.

Approved by the Board on : December 15th, 2022

Entry into force : December 15th, 2022

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Appendix 1: WJI 2030 REPORTING FORM

Complainant <i>(The person or organization raising the complaint)</i>	
Contact details of the Complainant	
Organization(s)	
Contact person	
Position/role	
Address	
Phone number <i>(Including country code)</i>	
Fax number <i>(Including country code)</i>	
Email address	
Remain anonymous	Yes No
Topic(s) of complaint <ul style="list-style-type: none"> - Conduct of the WJI 2030 - Breach of WJI 2030 Statutes - Breach of WJI 2030 Code of Conduct - Misuse of WJI 2030 affiliation / membership - Misuse of WJI 2030 intellectual property - Non-compliance with the WJI 2030 Minimum requirements - Other 	

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Description of complaint	
What do you expect to achieve?	
Did you already have prior contact with any other organisation on the subject of your complaint?	No <input type="checkbox"/> Yes <input type="checkbox"/> If yes, with who? And when?

Please acknowledge that you are authorized to make this submission on the above-named organisations' behalf.

Signed: _____

Dated: ____/____/ ____

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FOR INTERNAL USE

Revision History

Ver	Date	Reason for Issue	Prepared	Owner	Approved
1.0		Issued for use			
2.0		Issued for use			
3.0		Issued for use			

Summary of Changes

Section(s)	Change Description