

Contact Information

COMPANY NAME: **Ostbye & Anderson (Ostbye)**

DATE: **01/15/2025**

REPORTING PERIOD: **2024**

CONTACT: **doug.groebner@ostbye.com**

COMPANY MANAGEMENT SYSTEMS

Ostbye has a Supply Chain Policy in place detailing our commitment to respect human rights throughout our supply chain. Ostbye endorse these policies to our suppliers and stakeholders by distributing them via Supplier Agreement. These policies can also be accessed by our internal and external stakeholders via our website.

To aid us identifying our human rights impacts we have developed and implemented a due diligence process using the RJC toolkit regarding Human Rights; we have the following human rights policy in place [see supplier agreement]. The senior manager responsible for overseeing our human rights impacts is the Corporate Controller, Doug Groebner.

As a company we communicate our expectations regarding human rights by our supply chain policy. In addition to this, we also take following steps to strengthen our engagement with suppliers; by having monthly meetings with our 4 major jewelry vendors which has helped improve communication and our understanding of their companies.

Our grievance mechanism for internal and external stakeholders can be accessed via our website. The employee responsible for these grievance mechanism(s) is Corporate Controller, Doug Groebner.

IDENTIFIED & ASSESSED RISKS

We assess our suppliers practice relating to human rights by using the RJC toolkit, supplier agreements and searching online. During our assessment, we identified one potential risk.

When we identify a risk we:

- Assess the severity of the risk and its impacts.
- Establish mitigation measures, weather the risk can be mitigated or minimized and/or communicated with suppliers.
- Review and monitor risk.
- If risk cannot be mitigated or minimized, discontinued relationships with supplier after 6 months

After we have reviewed the risk with determined it was low risk at this time.

STRATEGY

Risk assessment findings are reviewed by our compliance manager. To respond to the risks identified within our supply chain, we use the RJC risk assessment toolkit to create a tailored approach for each risk.

TRAINING

Ostbye employees involved in the supply chain management have been part of the process of implementing the procedures used identify and assess risk of human rights.

Ostbye communicate to our stakeholders regarding our due diligence activities and efforts to prevent human rights risks. This communication is in the form of policies, annual reports and verably. If a human rights risk is identified we would communicate the risk and how we are addressing it to potentially affected stakeholders by verbally along with follow up regarding the solution.