

Ostbye & Anderson, Inc.

10055 51st Ave, N
Minneapolis, MN 55442

Ostbye's Supply Chain Policy

1. Ostbye is a fine jewelry manufacturer who for over 100 years has been committed to the respect of human rights, to avoiding contributions to the finance of conflict and complying with all relevant UN sanctions, resolutions and laws.
2. We are a certified member of the Responsible Jewellery Council (RJC) as proven through an independent third-party verification. As such we commit to and comply with:
 - a. Respecting human rights according to the Universal Declaration of Human Rights and International Labor Organization Fundamental Rights at Work.
 - b. Refusing to engage in or tolerate bribery, fraudulent misrepresentation of the origin of minerals, corruption, money laundering, non-payment of taxes, fees, royalties to governments or finance of terrorism.
 - c. Supporting transparency of government payments and rights-compatible security forces in the extractives industry.
 - d. Refusing to provide direct or indirect support to illegal armed groups.
 - e. Enabling stakeholders to voice concerns about the jewelry supply chain.
 - f. Implementing the OECD 5-Step framework as a management process for risk based due diligence for responsible supply chains of minerals, diamonds and gemstones from conflict-affected and high-risk areas as identified by OFAC (Office of Foreign Assets Control) documentation and notification.
3. We also commit to using our influence to prevent abuses by others. In doing so, we will conduct no less than an annually, a risk assessment of suppliers we source our precious metals including gold, platinum and silver, colored gemstones and diamonds from, in accordance with OECD guidance and risks. This includes a process whereby no less than two members of our company's senior management team assess and assign a risk level per OECD risks. Results of this risk assessment are reviewed. For suppliers falling in an unacceptable risk status, discussion of forthcoming strategy, may include a) continuing trade throughout the course of measurable risk, b) suspending trade with the supplier while pursuing measurable risk mitigation or c) disengaging with a supplier after failed attempts at mitigation or if mitigation is unacceptable. In the event that we pursue mitigation efforts while continuing trade or suspending trade, we will consult with you and affected stakeholders including but not limited to government authorities, international/civil society organizations where appropriate. The objective is to help our suppliers respect human rights and avoid contributing to conflict through their sourcing practices. The process is intended to help make supply chains more transparent and prevent the extraction and trade of minerals from becoming a source of conflict, human rights abuses, and insecurity.

4. Regarding serious abuses associated with the extraction, transport or trade of diamonds/colored gemstones

We will neither tolerate nor profit from, contribute to, assist or facilitate the commission of:

- a. torture, cruel, inhuman and degrading treatment;
 - b. forced or compulsory labor;
 - c. the worst forms of child labor;
 - d. human rights violations and abuses; or
 - e. war crimes, violations of international humanitarian law, crimes against humanity or genocide.
5. We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are committing abuses described in 4 or are sourcing from, or linked to, any party committing these abuses.
 6. **Regarding direct or indirect support to non-state armed groups**
We only sell or purchase diamonds/colored gemstones that are fully compliant with the Kimberley

Process Certification Scheme and, as such, will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring diamonds/colored gemstones from, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates who illegally:

- a. control mine sites, transportation routes, points where diamonds/colored gemstones are traded and upstream actors in the supply chain; or
 - b. tax or extort money or diamonds/colored gemstones at mine sites, along transportation routes or at points where diamonds/colored gemstones are traded, or from intermediaries, export companies or international traders.
7. We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are sourcing from, or are linked to, any party providing direct or indirect support to non-state armed groups as described in paragraph 6.

8. Regarding public or private security forces

We affirm that the role of public or private security forces is to provide security to workers, facilities, equipment and property in accordance with the rule of law, including law that guarantees human rights. We will not provide direct or indirect support to public or private security forces that commit abuses described in paragraph 4 or that act illegally as described in paragraph 6.

9. Regarding bribery and fraudulent misrepresentation of the origin of diamonds/colored gemstones

We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of diamonds/colored gemstones, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of diamonds.

10. Regarding money laundering


We will support and contribute to efforts to eliminate money laundering where we identify a reasonable risk resulting from, or connected to, the extraction, trade, handling, transport or export of diamonds/colored gemstones.

Grievance Mechanisms

External stakeholders may raise Human Rights and Supply Chain risk concerns by notifying Ostbye. We will ensure anonymity of the person raising the grievance and protect that person from retaliation. We provide the following methods of communication:

- Email your concerns to doug.groebner@ostbye.com
- Call at 763.694.6003
- You may also notify us in writing through US Postal service, by mailing correspondence to: Doug Groebner, 10055 51st Ave N, Minneapolis, MN 55442

All grievances will be investigated and proof of investigation, communication to the relevant business partner and remediation recommendations will be documented and retained within our company documents. Outcomes of grievance investigation will be communicated as quickly as possible and directly to the relevant business partner or those affected, with an explanation of how we identified and are addressing this risk, while providing them with all safety and welfare information they may need to remediate the risk. Remediation of the risk concern can take the form of acknowledgment or apology, compensation for the harm, or other means.

Signed: 
Title: President
Date: 04/05/2024