



CLYDE DUNEIER

BRILLIANT SINCE 1910

50 West 47th St. Suite 310, New York, NY 10036 | 212-398-1122

Employee & Supply Chain Grievance Procedures

Clyde Duneier, Inc. has established this established this Employee & Supply Chain grievance procedure to hear concerns about Employee & Corporate Human Rights violations, circumstances in its workplace, operations, statements, supply chain procedures or OECD supply chain involving diamonds, colored gemstones and precious metals from conflict-affected and high-risk areas.

Jemma Kim is responsible for implementing and reviewing this procedure.

Concerns can be raised by interested parties via email or telephone to:

Jemma Kim

Tel: 212-398-1122

Email: jemma@clydeduneier.com

On receiving a complaint, we will aim to:

- get an accurate report of the complaint;
- Senior management will review complaint and consult (via web or attorney) how to implement corrective actions;
- explain our complaints procedure;
- find out how the complainant would like it handled;
- decide who is the appropriate person internally to handle the complaint, or help redirect the complaint to another entity, such as the relevant supplier, or a relevant industry body;
- where the issue can be handled internally, seek further information where possible and appropriate;
- identify any actions we should take, or monitor the situation;
- If corrective actions are required, they will be implemented in policies and procedures;
- advise the complainant of any decisions or outcomes; and
- keep records on complaints received, and the internal process followed, for at least five years.

Clyde Duneier, Inc. ensures that the person filing this grievance shall do so without fear of blowback, retaliation, dismissal or harassment. The grievance can be filed anonymously by company employees via anonymous email, fax or phone accounts. The grievance filed shall remain confidential.

Grievance procedures shall be reviewed with company employees annually as part of the employee policies annual review.

This grievance procedure has been approved by senior management and is included in the employee handbook, is available online and is posted in the office.

Jemma Kim

COO

January 12, 2026

Clyde Duneier, Inc. ensures that the person / company filing this grievance shall do so without fear of blowback, retaliation, dismissal or harassment. The grievance filed shall remain confidential.

"Where fine jewelry has been a family tradition since 1910"

