

TLKE – Social and Environmental Policy March 2023

TLKE is committed to social and environmental rights and works to ensure that we do not knowingly have a damaging impact through our operations or business relationships.

We respect and appreciate our people, suppliers, partners and clients, the communities in which we work, and the natural environment. We actively seek to make a positive contribution to the world around us by focusing on the way we work and live.

Our values are core to the way we operate, and we bring these to life, every day. This policy summarises our key focus areas and highlights some of the ways in which we will measure our efforts. Through our business activities we aim to contribute to UN Sustainable Development Goal 12: Responsible Sourcing and Consumption by:

- The sustainable management and efficient use of natural resources
- Reducing our waste generation through reduction, recycling and reuse

OUR MISSION

TLKE Mission: To supply major multiple retailers in the UK and Europe with a reliable and sustainably sourced supply of jewellery and accessory brands, whilst maintaining their brand integrity and TLKE values.

TLKE Values: Integrity, Collaboration, Enjoyment, Straight talking, Family.

OUR WAYS OF WORKING

Business Governance

It is important to us that we work responsibly. We uphold the <u>Ten Principles of the UN Global Compact</u> through our strategy, policies and procedures and promote transparency and traceability through all aspects of our business.

We have systems in place to monitor compliance with all laws and regulations applicable to our business. These include:

- Implementing policies to ensure we do not participate in or tolerate money laundering, bribery, corruption or the finance of terrorism.
- Putting in place policies to govern the trading and processing of precious metals and stones, including a due-diligence management system to ensure we do not knowingly trade in conflict minerals and can provide accurate information on the provenance of precious metals, diamonds and coloured gemstones.

We assess our performance against the Positive Luxury accreditation scheme to ensure we are working to the highest third-party social and environmental standards across our



business. We communicate our targets and progress externally so that our community can hold us accountable.

Looking After People

We are proud to work with a dynamic community of people, from those we employ to those in our supply chain and the wider community. Here's our commitment to them:

Human Rights

TLKE is committed to developing an organizational culture that supports internationally recognized human rights as defined by the <u>United Nations Guiding Principles on Business and Human Rights</u>. We will avoid contributing to adverse human rights impacts through our own activities and seek to prevent or mitigate impacts that are directly linked to our products.

This policy applies to all TLKE employees. It also applies, as far as is reasonably achievable, to our upstream and downstream supply chain through partners, suppliers and third-party contractors. In joint ventures where TLKE does not have overall control, we encourage businesses to adopt the same or similar standards.

We regularly review and update progress on our efforts, and communicate the results through our impact report. If we identify adverse human rights impacts, we engage in remediation processes by ourselves or in cooperation with other stakeholders. If any stakeholder believes that someone is violating the Human Rights Policy or the law, they are asked to report it immediately to their manager, Human Resources or company Director.

Our team and community

We promote equal opportunity and diversity across our team so our staff are able to work with dignity and respect. We are committed to running a business that is a safe, healthy and empowering place to be.

We aim to give back to the people in our local community by partnering with charitable initiatives, running fundraising events and offering employee volunteer days.

Full details of our people related policies, including our equality and diversity policy are documented in our employee handbook.

Our supply chain

We only work with suppliers that share our values. This means they adhere to national legislation on working hours and fair pay, ensure employment is freely chosen, do not tolerate forced or child labour, uphold freedom of association and collective bargaining, prevent discrimination and harassment, and provide a safe place to work.

We expect our suppliers to carry out due diligence on gold supply chains based on the 5step framework of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance).



Diamonds in our own brand product must, at a minimum, meet the requirements of the Kimberley Process Certification Scheme and the World Diamond Council System of Warranties

We expect our suppliers to engage in reasonable due diligence to ensure that all gemstones delivered and/or sold to TLKE are extracted from conflict-free regions and have been mined and processed in a manner that respects human and labour rights.

All suppliers we work with a required to commit to our Supplier Terms and be assessed for compliance to these international standards with any findings and remedial actions tracked and subject to follow up assessments.

Protecting the Environment

We are committed to working in a way that protects the environment by using natural resources responsibly and sourcing from carefully managed supply chains.

Our Office

We have pledged to reduce our environmental impact by:

- Minimising our water and carbon footprint
- Minimising our use of paper and other forest-products
- Finding opportunities to reduce waste and recycle
- Purchasing office supplies and utilities from suppliers that show best practice in their business by taking steps to positively impact the environment and community around them
- Increasing the useful life of parts and components.

All TLKE staff have a duty of care to ensure that our commitments are upheld and that we work in the spirit of continuous improvement. Further details are documented in our Employee Company Handbook, with environmental objectives documented in our annual strategy and progress reported in our impact report.

Responsible Sourcing

As a jewellery brand we are reliant on natural resources to produce our collections. We are committed to souring these responsibly.

We expect our suppliers to engage in reasonable due diligence to ensure that all other metals, diamonds and gemstones delivered and/or sold to TLKE are sourced from supply chains that do not inflict environmental damage under prevailing industry standards.

How this policy is implemented

The policy is publicly available on our website and communicated to employees during our induction process. Alongside our ongoing management systems, we review this policy



annually and regularly assess our business practices to identify any risks or opportunities for further improvement.

We welcome feedback on the way we do business from both internal and external stakeholders. To raise concerns or grievances about any aspect of our business please contact us using the form on our website.

Policy Endorsed by Teresa Timberlake

L. Knoelelle

31.03.2023