

DAVID YURMAN

SUPPLIER CODE OF CONDUCT

At David Yurman Enterprises LLC (“David Yurman”), we pride ourselves on working with artisans and craftspeople in the jewelry trade that share our commitment to producing jewelry of the highest standard, including the way in which our jewelry and other products are produced. The following are the manufacturing practices that David Yurman expects of all of our suppliers of finished goods and components (“Suppliers”) incorporated into David Yurman jewelry, timepieces and other products sold in our retail boutiques, through our website, through our network of authorized retailers, or otherwise sold under the David Yurman trademarks (“David Yurman Products”). Additional manufacturing practices may be applicable depending on the nature of manufacturing or component supply and will be communicated to the relevant Suppliers separately. All finished goods and component suppliers will be subject to periodic audits of their manufacturing facilities to confirm compliance with these and any other obligations as provided herein.

- 1. Supplier’s manufacturing facility.** David Yurman requires that all David Yurman Products be produced in facilities that meet basic standards for working conditions and protection of the environment. All goods delivered to David Yurman directly or to one of David Yurman’s contract manufacturer for incorporation into a David Yurman Product must be produced entirely in Supplier’s manufacturing facility, such as a finished goods jewelry manufacturing facility, a metal component manufacturing facility, a metal casting facility, or a stone cutting or polishing facility (“Supplier’s Manufacturing Facility”).
- 2. No employment of children.** Neither Supplier nor Supplier’s Manufacturing Facility will employ children. Children are those younger than the age when compulsory schooling has been completed, or those younger than the minimum legal age requirement in effect in the jurisdiction where Supplier’s Manufacturing Facility is located. Supplier will obtain documentation of the date of birth of each person employed in Supplier’s Manufacturing Facility and maintain such documentation in the facility.
- 3. Human rights policy; compliance with applicable employment laws.** We respect human rights according to the Universal Declaration of Human Rights and International Labor Organization Declaration on Fundamental Principles and Rights at Work. Accordingly, our Suppliers must comply with all applicable laws governing employment, wages, overtime, overtime pay, working conditions, benefits, and safety with respect to all workers in Supplier’s Manufacturing Facility.
- 4. No forced or coerced labor; no harassment.** Workers in Supplier’s Manufacturing Facility will be free to leave their employment without threat or coercion. Accordingly, Supplier will not employ forced, indentured, debt-bonded or convict labor, or use any practice to coerce the continued employment of any person, such as the practice of requiring employees to pay recruitment commissions or the withholding of travel documents. Supplier’s Manufacturing Facility will not use corporal punishment, threats of violence, or other forms of mental or physical coercion. Sexual harassment of workers will not be permitted and workers will not be discriminated against on grounds of race, religion, age, national origin, sexual orientation, disability, or gender.
- 5. Wages and overtime.** Supplier will pay wages and overtime pay as required by applicable laws to all employees in Supplier’s Manufacturing Facility. However, if local standards for wages and overtime pay in the industry in which Supplier’s Manufacturing Facility is engaged are higher than the legally required minimum, Supplier’s Manufacturing Facility will meet or exceed such higher standard. Supplier’s Manufacturing Facility will provide their workers with understandable wage statements for each pay period, which statements will disclose days or hours worked, the wage or piece rate applicable, and the nature of any deductions taken from pay.

6. **Safety and health of employees, contractors and other workers.** Supplier's Manufacturing Facility will be a safe place to work. Lighting, temperature control, and ventilation will be adequate for the safe performance of the work and the health of the employees. Suppliers will provide all relevant employees with proper training regarding the safe use and maintenance of all machinery and hazardous materials, sufficient personal protective equipment, and safe supplies of potable water, among other health and safety obligations.
7. **Environmental laws.** Supplier's Manufacturing Facility will be operated in compliance with all applicable environmental laws and regulations. All hazardous waste will be disposed of in facilities designed for such disposal without risk to the environment.
8. **No sourcing from countries of high risk.** Supplier will source its materials responsibly and will conduct due diligence so as not to source from conflict-affected and high-risk areas, and will not engage in or tolerate bribery, corruption, money laundering or terrorist financing, or support of illegal armed groups. Supplier will neither tolerate nor profit from, contribute to, assist, or facilitate the commission of: torture, cruel, inhuman and degrading treatment; forced or compulsory labor or child labor; human rights violations or abuses; or war crimes, violations of international humanitarian law, crimes against humanity, or genocide. Supplier must conduct annual reviews of its suppliers and identify any red flags in its supply chain. If any red flags are identified, Supplier will conduct further investigation through a risk assessment and implement a risk management strategy.
9. **Anti-Corruption and bribery.** Supplier will not offer, promise, give, or demand any bribes. Supplier will not solicit any bribes, conceal or disguise the origin of goods, or misrepresent taxes, fees and/or royalties paid to any governmental authority or regulatory body in connection with the extraction, trade, handling, transport, or export of materials. Supplier will support efforts to eliminate money laundering where we identify a reasonable risk resulting from, or connected to, the extraction, trade, handling, transport, or export of goods.
10. **Due Diligence.** Suppliers are encouraged to implement the OECD 5-Step Framework as a management process for risk-based due diligence and achieve full traceability through their supply chains and only buy or sell diamonds that are fully compliant with the Kimberley Process Certification Scheme and include World Diamond Council System of Warranties on invoices.

David Yurman must be permitted to visit Supplier's Manufacturing Facility to assure compliance with the foregoing standards and will have open and free access to communicate with all workers engaged at Supplier's Manufacturing Facility outside the presence of facility management and without threat to such workers of loss of job or reprisal. Such visits may be scheduled or unscheduled and may be conducted by David Yurman or by a third-party contracted by David Yurman for such purpose.

The foregoing manufacturing practices are considered to be part of every purchase order issued by David Yurman. Any goods produced in a manner that does not comply with these practices may be rejected as nonconforming, and any violation of any of the foregoing manufacturing practices entitles David Yurman to immediately cancel all outstanding purchase orders between Supplier and David Yurman, in addition to all other remedies available to David Yurman.