



1. Company Description

FRED Paris, an affiliate of the LVMH Moët Hennessy Louis Vuitton SE Group ("LVMH"), designs, manufactures, markets, and distributes high-quality jewelry under the internationally renowned luxury brand FRED.

FRED Paris and all its entities and establishments worldwide (hereinafter "FRED") operate in strict compliance with applicable national and international laws, regulations, and conventions, as well as best practices in ethics, human rights, and social responsibility.

2. Commitments

FRED is committed to acting with integrity in all its activities and to promoting ethical conduct based on respect for applicable laws, international standards, and the values of the LVMH Group. This commitment is reflected in the adoption and implementation of internal policies and procedures aimed at regulating the company's practices, guiding employees in the exercise of their duties, and defining FRED's expectations of its partners and suppliers.

FRED is a certified member of the Responsible Jewellery Council (RJC). This certification aims to provide customers with the assurance that our production chain is managed responsibly and sustainably.

FRED collaborates with business partners and suppliers who agree to comply with the requirements of Fred's Supplier Code of Conduct, as well as the principles stipulated in the conventions of the International Labour Organization, the Universal Declaration of Human Rights, the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, and the United Nations Women's Empowerment Principles.

FRED is committed to implementing the five-step process of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Furthermore, FRED is committed to implementing the United Nations Guiding Principles on

Business and Human Rights, as well as the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights.

FRED is committed to respecting the initiatives undertaken by the Group as part of its environmental roadmap, LIFE 360. The program sets ambitious targets for 2026 and 2030 around four key pillars.

With this statement, FRED wishes to highlight the policies, risk assessment, risk assessment management system, and grievance mechanism, which aim to prevent or mitigate negative consequences related to our sourcing practices.

3. Organizational Structure

FRED's supply chain relies on a network of suppliers and business partners contributing to the sourcing of raw materials, the manufacturing of products, and the provision of services necessary for conducting business activities. FRED jewelry items are manufactured within a network of external suppliers located notably in France, Italy, Belgium, Portugal, Germany, and Switzerland.

4. Policies

FRED requires its suppliers to comply with the ethical principles outlined in its Supplier Code of Conduct and to ensure that their own suppliers and subcontractors adhere to these principles. The obligation to accept and respect FRED's Supplier Code of Conduct is part of the contractual terms and conditions. This Code of Conduct specifically emphasizes the obligation to address social issues and to respect and adhere to moral and ethical values in business management regarding human rights, working conditions, and environmental issues.

FRED is aware of the potential social consequences of its activities, particularly concerning the sourcing of raw materials. For this reason, the company has defined a responsible sourcing approach and policies to conduct its business ethically and with respect for human rights. Special attention is paid to the production of jewelry items:

- FRED confirms its commitment to act responsibly and to collaborate with trusted diamantaires located in countries that are signatories to the Kimberley Process, an initiative bringing together governments, industry, and civil society, aimed at preventing the circulation of conflict diamonds through an international certification system. In addition, all FRED suppliers are members of business associations such as the World Diamond Council, which aims to implement the Kimberley Process through a self-regulation system.
- Since 2011, FRED has been a member of the Responsible Jewellery Council and continues to ensure the certification of the RJC Code of Practices. The Responsible Jewellery Council (RJC) is a non-profit organization created to promote a common standard for responsible ethical, social, and environmental practices that respect human rights throughout the supply chain of gold, platinum group metals, diamonds, and colored gemstones, from mining to retail. RJC members commit to and are independently audited on their compliance with the RJC Code of Practices, an international standard for responsible business practices concerning gold, platinum group metals, diamonds, and colored gemstones. The Code of Practices addresses human rights, labor rights, environmental impacts, mining practices, product alteration, and many other important topics in the

jewelry supply chain. The certification confirms its commitment, in close collaboration with its shareholders, to promote ethical and responsible practices within its business activities and fundamental strategy through a process of continuous improvement.

- FRED is committed to strengthening systems and controls for respecting human rights throughout the supply chain. Therefore, the Supply Chain department and the Ethics & Compliance Committee regularly assess the adequacy of the procedural framework and identify opportunities for continuous improvement.

5. Supply Chain Risk Assessment

In coherence with LVMH programs and the principles upheld by the Responsible Jewellery Council, FRED monitors social and human rights risks throughout the supply chain.

To this end, FRED has implemented a supplier risk management process, consisting of the following three steps:

1. supplier risk assessment;
2. social and environmental control of suppliers;
3. monitoring.

A supplier risk analysis is conducted, and an overall score is assigned to each of FRED's direct suppliers based on their level of exposure to social and environmental risks. Furthermore, key suppliers included in the risk assessment annually receive a questionnaire to collect information on their own due diligence management system, in accordance with the recommendations of the OECD guidance. They are asked to list from which suppliers precious stones and metals have been sourced and to indicate their origin. In addition, suppliers are questioned about the results of their own supplier risk assessment and must detail potential alert cases.

Thanks to the suppliers' responses to the questionnaires and knowledge of suppliers' activities and their certification level (e.g., RJC), FRED has identified potential risks. Based on the analyses conducted in 2025, no major risks requiring the implementation of a specific remediation plan have been identified. Nevertheless, FRED maintains continuous vigilance and adapts its controls according to evolving risks.

6. Due Diligence and Supplier Control

FRED has incorporated into its contractual relationships with its suppliers the right to conduct visits and inspections of production sites. These controls can be announced or semi-announced and are carried out based on recognized standards, particularly the Responsible Jewellery Council (RJC) Code of Practices.

FRED adheres to the new version of the RJC Code of Practices, published in 2024. Consequently, the company is working to strengthen its internal procedures and processes, paying particular attention to diamond sourcing through the implementation of a due diligence process throughout its diamond supply chain, in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. In addition, through its association with LVMH, FRED is part of the Colored Gemstone Working Group. This group brings together stakeholders in the luxury jewelry market to better understand and

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manage the risks and potential opportunities concerning positive social and environmental impacts in the sourcing of colored gemstones.

7. Training and Awareness

All employees can access the Ethics & Compliance intranet, as well as the LVMH 360 Learning platform, which includes several training tools and practical information to promote exemplary conduct in daily activities.

FRED promotes a culture of dialogue and transparency and has adopted an internal alert system, via a dedicated online interface for employees. The system allows for secure and completely confidential reporting of any actual or potential violation of internal guidelines and procedures, ethical principles, as well as applicable laws and regulations.

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