



Leo Schachter Conflict Minerals Policy

Leo Schachter Diamonds, L.L.C. (LSD) and Schachter Diamonds Complete (a dba of LSD) is fully committed to the responsible sourcing of our products and the respect of human rights, and we expect the same from our suppliers around the world. We continually strive to assure our customers, employees, investors and other stakeholders that our supply chain avoids action that may directly or indirectly finance armed conflict and serious human rights violations around the world including the Democratic Republic of Congo and its adjoining countries.

LSD has been at the forefront of responsible sourcing in the diamond and jewelry supply chain and is a certified member of the Responsible Jewellery Council (RJC), an organization that is committed to promoting responsible ethical, human rights, social and environmental practices throughout the jewelry supply chain. As an active participant, we fully support the RJC's membership Code of Practices and Chain of Custody standards.

LSD has also been active in cross-sector coalitions and working groups to ensure that companies respect human rights and avoid contributing to armed conflict. LSD supports the Organization for Economic Cooperation and Development (OECD) due diligence guidelines supplement for gold, the London Bullion Market Association (LBMA) Responsible Gold Guidance, and the Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502, relating to our supplies of gold.

To comply with the conflict-free sourcing requirements;

- LSD requires and audits statements from our vendors that gold they are providing
 - is obtained from verifiable sources that can be audited and traced back to LBMA.
 - The review and substantiation of these claims will take place from time to time as LSD renews its certification with RJC along with the provenance Bolt-on for conflict free metals.
- LSD does not deal in Tantalum, Tungsten or Tin.
- LSD requires its vendors provide a statement verifying same as above and to maintain accurate records that can be audited upon request. If a seller supplies, will supply or expects to supply any goods to LSD that contain any amount of any metal (i.e. silver, steel, platinum, gold, tin, tantalum, tungsten, etc.), Seller will include the warranty statement on all invoices and



- supporting documentation such as delivery notes
- If Seller delivers goods without the proper warranty statement documentation, the product will either be
 - held until the proper documentation is obtained, or
 - be returned to Seller at Seller's sole cost and expense,
 - such determination to be made by LSD.

The warranty statement will be similar to:

The seller warrants that any products containing gold, tin, tungsten or tantalum have been supplied in compliance with the accepted sourcing protocols as governed by the RJC and compliant with Dodd-Frank regulations.