

MEJURI

60 Bloor Street West, Suite 800, Toronto, ON M4W 3B8, Canada

Mejuri Inc.

Fighting Against Forced Labour and Child Labour in Supply Chains Act Report

Fiscal Year 2023

(February 1, 2023-January 31, 2024)

Approved by the Board of Directors on June 15, 2024

Fighting Against Forced Labour and Child Labour in Supply Chains Act Report

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A. Introduction

This report was prepared by Mejuri Inc., a company existing under the laws of Ontario (“**Mejuri**” or the “**Company**”), in accordance with the requirements of the Canadian *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”).

Mejuri strives to maintain a high standard of ethical business conduct. We recognize the importance of upholding human rights and we are committed to doing our part in combating forced and child labour in our business and supply chains. For purposes of this report, the term "modern slavery" is understood to include forced labour and child labour within the meaning of the Act.

This report describes the actions the Company took during the company's most recently ended financial year starting February 1, 2023 and ending January 31, 2024 to prevent and reduce the risk that forced labour or child labour is used at any step of the production supply chain for goods imported into Canada by Mejuri.

B. Our Company – Structure, Activities and Supply Chain

Mejuri was founded in 2015 and sells fine jewellery across the globe. Over the years, Mejuri grew from a digital, direct-to-consumer business to become a global brand with over 640 employees and 29 retail stores across two continents. The Company operates 6 retail stores in Canada, 3 in the United Kingdom, and 25 in the United States directly and through its affiliated entities, namely Mejuri (UK) Ltd. and Mejuri (US), Inc. Mejuri’s corporate headquarters and fulfillment center is located in Toronto, Ontario. The Company also has an office in New York, USA.

The Company designs its products and packaging with complete product lifecycle in mind. The Company sources products from a variety of third party manufacturing partners across different geographic regions including Germany, Italy, Turkey, India, Thailand, Vietnam, and China.

Mejuri is committed to responsible sourcing and prioritizes working with certified suppliers who are vetted by organizations such as the Responsible Jewellery Council (“**RJC**”).

C. Policies and Due Diligence Processes in relation to forced labour and child labour

1. Corporate Employee Handbook

Mejuri's Corporate Employee Handbook ("**Employee Handbook**") delineates specific policies and standards of ethical behaviour expected from employees which include but are not limited to a Health and Safety Policy, a Respect and Anti-Harassment Policy, a Disconnecting from Work Policy and a Whistleblower Policy, including a third-party reporting hotline through which personnel can report suspected non-compliance. The Employee Handbook also articulates Mejuri's commitment to compliance with Canadian laws, standards, and practices as well as international standards.

2. Modern Slavery and Human Trafficking Policy

In November 2023, Mejuri introduced a Modern Slavery and Human Trafficking Policy that specifically articulates the Company's zero tolerance approach to forced labour, bonded labour, child labour, and human trafficking. The policy defines these concepts in a manner consistent with International Labour Organization ("**ILO**") principles. The policy provides guidance for employees on forced labour and child labour risk assessment and due diligence and specifies employee responsibilities. The policy encourages employees to report suspected non-compliance or concerns via the Company's Whistleblower Policy.

3. Social & Environmental Accountability Program and Supplier Code of Conduct

The Social & Environmental Accountability ("**SEA**") Program and Supplier Code of Conduct reflects Mejuri's commitment to maintaining ethical business practices. Mejuri's commitments within the SEA Program and Supplier Code of Conduct are informed by internationally recognized guidelines including the Ethical Trading Initiative, ILO International Labor Standards, the United Nations Guiding Principles on Business and Human Rights, Social Accountability International, the SA 8000 Standard for Social Accountability, the ILO's Code of Practice in Safety and Health, National Fire Protection Association Standards, the Organisation for Economic Co-operation and Development ("**OECD**") Guidelines for Multinational Enterprises, the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected High-Risk Areas ("**OECD Due Diligence Guidance**"), and OHSAS 18001 Certification.

The Supplier Code of Conduct sets clear expectations for Mejuri's suppliers and service providers on human rights, fair labor, environmental management, and ethical business practices. All suppliers and service providers must comply with the Supplier Code of Conduct. The Company only works with suppliers who can live up to these standards. This means no child or forced labor, human trafficking, and zero tolerance for discrimination or harassment, and fair working conditions and pay. The Supplier Code of Conduct is available in seven languages on Mejuri's [website](#).

The Supplier Code of Conduct specifies that the Company is committed to respecting human rights and strictly prohibits the use of child labour and forced labour in its operations and supply chains. It further states that any use of child labour or forced labour is in direct violation of the Supplier Code of Conduct and will be subject to corrective action and potentially termination of the business relationship, as will any other violation of human rights or applicable labour laws.

Suppliers are encouraged to report non-conformance in their operations or supply chain proactively to Mejuri.

In 2023, Mejuri expanded the SEA Program and distributed the Supplier Code of Conduct Guidance to its supply chain partners. It enhanced its supplier onboarding process and Supplier Code of Conduct Guidance to further clarify Mejuri's sustainability and social impact expectations and ensures that its suppliers have clear definitions and expectations of Mejuri's standards.

D. Assessing and managing forced labour and child labour risks

Mejuri assesses risk on an ongoing basis in relation to its sourcing networks for all materials to prevent any associated materials linked to conflict or unethical practices. Mejuri understands both the importance and challenges of transparency and traceability in the jewellery industry and aims to achieve 100% traceability of all products by 2030.

Through the SEA program, Mejuri actively manages and mitigates risk throughout its operations and ensure that it works with suppliers who align with its values and uphold Mejuri's standards. Mejuri may not have full visibility into the respective upstream supply chains of its suppliers but requires its suppliers to provide accurate traceability information related to raw materials, processing, and final assembly of all products manufactured for Mejuri's subsequent sale or distribution.

Mejuri acknowledges that there is risk that forced labour and child labour can occur at any stage of the supply chain, with risk levels varying based on factors such as type of raw material, country/region of manufacture or raw material sourcing, or the nature and sophistication of each individual supplier's internal policies and due diligence process. The Company's primary forced labour and child labour risks exist within its supply chain for merchandise, notably in the sourcing of raw materials and product manufacturing, however, the Company has also identified risk in select contractors and suppliers supporting its retail operations, such as cleaning providers. In 2023, Mejuri did not identify any instances of forced labour or child labour in its operations or supply chains.

Mejuri has implemented a series of risk mitigation factors including engaging in thorough due diligence in the onboarding of new suppliers, assessing existing suppliers for adherence with Mejuri's Supplier Code of Conduct, and communicating Mejuri's strict standards and zero tolerance approach to forced labor, bonded labor, child labor, and human trafficking to all stakeholders.

In 2023, Mejuri conducted supplier audits in key manufacturing facilities that cover 52% of the Company's annual spend to monitor the suppliers' adherence to Mejuri's SEA Program. The process is based on collecting information from and regarding the suppliers through questionnaires and audits. Mejuri's audits are aligned with international best practices and notable certifying bodies such as the Ethical Trading Initiative and the Social Accountability Initiative and address forced labour and child labour issues. Under Mejuri's risk-based approach, if a supplier is considered high risk, it is audited on an annual basis. If risks are identified, Mejuri collaborates with its suppliers to address and remediate these issues.

Mejuri's contracts with its suppliers mandate compliance with all applicable laws and regulations. In addition, contracts require suppliers to provide contractual representations that they shall

comply with Mejuri's Supplier Code of Conduct and authorize Mejuri to engage in monitoring activities to confirm compliance with the Supplier Code of Conduct.

Mejuri only sources from suppliers that use Kimberley Process-compliant diamonds, a United Nations-mandated certification system that combats the trade of conflict diamonds. Mejuri's jewelers also source exclusively from refiners certified or audited by industry authorities like the RJC, the London Bullion Market Association, and the Responsible Minerals Initiative.

Of note, the RJC is the primary standard-setting and certification organization for the jewellery industry. The RJC Code of Practices is a standard for responsible jewellery throughout the supply chain and addresses a wide range of supply chain issues, including business ethics, human rights, social and environmental performance. It covers all the raw materials that are used in the products sold by Mejuri. Suppliers must undergo a certification process, audit, and satisfy the requirements before they can achieve RJC Certified Member status. The RJC Code of Practices includes a due diligence process in line with the OECD Due Diligence Guidance and includes specific questions on forced labour and child labour.

Mejuri requires its suppliers to attest to their due diligence on upstream suppliers of gold, silver, platinum group metals, natural diamonds and natural coloured gemstones; suppliers are required to follow the framework in the OECD Due Diligence Guidance and to identify the country of mining origin.

Mejuri shall continue to be transparent and pro-active in its approach to reduce and mitigate the risk of any forced labour, child labour or human trafficking in the Company's direct operations, as well as in its supply chain.

E. Remediation measures

During the 2023 reporting period, Mejuri did not identify any instances or significant risks of forced labour or child labour in its operations or supply chains that would require remediation measures. The Company accordingly did not undertake any measures to remediate the loss of income to the most vulnerable families resulting from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains, as such measures were not considered to be applicable. Mejuri is committed to working with its suppliers to assess and monitor risks and to respond appropriately to remediate the impact in accordance with Mejuri's policies and processes.

F. Training

All of Mejuri's employees are required to review the Employee Handbook during employee onboarding and routine training is administered by the Company's People Operations team. In 2023, all employees submitted an acknowledgement to indicate that they have read, reviewed, and agreed to the policies in the Employee Handbook. The Company does not currently conduct training specific to forced and/or child labour, but is developing broader business conduct training which will include a more detailed overview of the Supplier Code of Conduct and Modern Slavery and Human Trafficking Policy.

G. Assessing effectiveness

Mejuri acknowledges its responsibility to continue assessing the effectiveness of its measures to identify and mitigate the risks of forced labour and child labour in its operations and supply chain. We regularly review the effectiveness of our actions by:

- Actively monitoring its suppliers to ensure that they uphold the standards in the Supplier Code of Conduct, including through Mejuri's Social & Environmental Accountability supplier audit program.
- Collecting information and incorporating sustainability and human rights considerations into the supplier pre-qualification and screening processes.
- Tracking key performance indicators and undergoing periodic reviews of Mejuri's approach to ensure continued alignment with evolving international standards and best practices.
- Investigating reports received through our established grievance mechanisms and ensuring complaints are properly resolved.

Mejuri collaborates closely with industry partners to gather feedback to improve its actions and standards.

- In 2022, Mejuri became a signatory to the UN Global Compact corporate responsibility initiative and undertook to adopt its principles in human rights, labor, the environment, and anti-corruption. The Company is an active participant in Network Canada and completed a case study on maternity leave with the UNGCNC team in 2023. Also in 2023, Mejuri's VP of Sustainability and Social Impact was elected to the Board of Directors for UNGC Network Canada.
- Mejuri joined BSR in 2022 and will continue to leverage its membership with BSR to expand its knowledge of corporate sustainability practices.
- In 2023, Mejuri received the Butterfly Mark certification, an internationally recognized trust mark for luxury brands that meet the highest standards of verified ESG performance. To help ensure Mejuri's programs and performance meet the requirements of external frameworks, it will be regularly measured against Positive Luxury's established and ever evolving ESG+ framework.

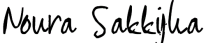
Mejuri will continue to move toward greater transparency and traceability of its supply chain. It will work closely with its employees and suppliers on forced labour and child labour topics and regularly review its policies and due diligence processes.

H. Approval and attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information

in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I have the authority to bind Mejuri Inc.

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Noura Sakkijha, CEO

June 15, 2024