



ELOQUENCE CORPORATION

35 West 45th Street, New York, NY 10036 Tel: 800-223-7390

HUMAN RIGHTS POLICY

We support and respect human rights in accordance with UN and OECD guidelines, fully detailed in our employee handbook. As part of our Know Your Counterparty policy, we expect our suppliers, customers, and stakeholders to maintain similar practices. In this regard, we maintain high level of diversity and inclusion; we support health and safety in the workplace; we do not condone forced or child labor nor human trafficking; we abide by applicable labor laws, and advocate living wage compensation. In addition, we support the environment and water resources to enable humanitarian practices. At least annually, we engage in an organization wide assessment of atmospheric carbon dioxide emissions. To the extent available, we purchase emissions credits to remain neutral in overall emissions.

Supplier and Customer risk is assessed annually, based on these values, in addition to the location of the business, financial attributes, and length and quality of business relationship. Our due diligence system evaluates our suppliers in these attributes based on the documents they provide to us, our experience, and our algorithmic risk evaluation system. This system looks into suppliers' attention to human rights, fair compensation, ethical health and safety practices, attention to the environment as it impacts human health, and absence of forced or child labor. The analysis of these factors generates a rating between 1 and 10 that is utilized in our supply chain risk evaluation. If the information is not forthcoming, follow up is required. We trade with only a few suppliers, and a limited customer base, with whom we have or seek to establish long term relationships, of firms of superior standing in the diamond and jewelry business and do not buy or sell diamonds or jewelry with the general public.

Questions can be sent to Chief Financial Officer Peter Rugg. [PR\(at\)MWINY.com](mailto:PR(at)MWINY.com). Grievances may be confidentially directed to [ComplaintsMWI\(at\)SomersAndAssociates.ie](mailto:ComplaintsMWI(at)SomersAndAssociates.ie)

Approved by the Board of Directors
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