



ELOQUENCE CORPORATION

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RESPONSIBLE SOURCING POLICY

We support and practice Responsible Sourcing in accordance with Dodd Frank, UN and OECD guidelines, and as part of our Know Your Counterparty policy, we expect our employees, suppliers, customers, and other stakeholders to maintain similar practices. In this regard, for our supply of both natural and lab grown diamonds, colored gemstones, gold and platinum, we support the Kimberley Process, human rights, the absence of corruption or the funding of armed groups, and protection of the environment. We do not source from conflict-affected high-risk areas (updated February 24, 2022, to include Russia). Supplier risk will be assessed based on these values, in addition to location of the business, financial attributes and length and manner of business relationship, updated annually. Our due diligence system evaluates our suppliers in as many as 12 of these attributes, as appropriate, based on the documents they provide to us. In each category, a ranking from 0 to 10 is applied. Membership in RJC and De Beers Sightholders are noted for reduced risk and third-party compliance assessment. We have developed a proprietary algorithmic risk evaluation system that inputs the risk rankings for the characteristics noted above and uses them to calculate an overall risk rating between 1 and 10. Low risk is defined as a rating of 1-2.5, and all of our current vendors in in this sector. Medium risk is 2.5-4, and we would work with these vendors to reduce risk. Any potential vendor with a risk rating over 4.0 would be discontinued until the risk improved. We only source our diamonds, colored gemstones, gold, and platinum from a small number of regular, well-established suppliers, with whom we have or seek to establish and maintain long term relationships. All diamond parcels received are tested to screen for lab grown stones. We segregate all lab grown goods in inventory and work in progress, deploy separate memos and invoices, and have differentiated tags and RFID to maintain appropriate disclosure. We do not buy or sell diamonds, gold, platinum, 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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