



January 30, 2025

### **Annual statement to company stakeholders**

Towards the end of the first half of 2025, Absolute Brilliance will undergo a re-certification audit as a certified member of the RJC (Responsible Jewellery Council) based on the COP 2019. The COP 2019 audit includes due diligence of our Supply Chain Policy including policies regarding OECD's (Organisation for Economic Co-operation and Risk Development) and CAHRA's (Conflict-Affected and High-Risk Areas).

The policies and procedures relating to RJC include:

- Anti Bribery & Facilitation payments
- Anti Money Laundering and Finance of Terrorism
- Adherence to the Kimberley Process and World Diamond Council System of Warranties
- Supply Chain Policy-OECD-CAHRAs
- Diamonds to be purchased from responsible and legitimate sources
- Company policy with regards to synthetic diamonds
- Security of People and Products
- Sexual Harassment Policy
- Product Integrity Practices
- Human Rights
- Health & Safety Performance
- Community Relations
- Environmental Performance
- Relationship with Business Partners
- Statement of commitment to RJC policies and procedures
- Commitment to employee policies manual

Review and training of RJC & company policies will take place prior to the RJC audit with a corresponding training log.

By informing our business partners of our RJC requirements, we are committed to educating the diamond and gemstone industry in proper workplace practices and procedures throughout the supply chain.

As part of the company risk review, Absolute Brilliance's supply chain has been made aware of the specifics of OECD's & CAHRA's and has had to complete paperwork and risk review acknowledging acceptance of our OECD policy. These companies must confirm they are incorporating said human rights policies as part of their corporate policies. Companies that are not in compliance may be given up to six months to meet our standards, during which Absolute Brilliance will work with these companies to develop proper procedures. Failure to comply with our standards will result in the termination of our business relationship. Upon the risk review of 2025, all supplier companies have met Absolute Brilliance human rights due diligence requirements.

Absolute Brilliance is committed to the safety and human rights of our personnel and has been trained in proper workplace behavior and complaint mechanisms. An internal company human rights risk assessment was performed and all standards and requirements have been met.

Letters to stakeholders have been posted online and have been distributed through to our company email list.

Policies and procedures are available at [www.absolutebrilliance.com](http://www.absolutebrilliance.com) and upon request.

Dov Lisker  
Director of Operations

Note: Absolutely Reimagined, Inc. is included in the stated policies under the name Absolute Brilliance, Inc.



## Human Rights Policy

We, at Absolute Brilliance, recognize our responsibility to respect human rights. We believe that our business has a role to play in protecting and promoting human rights.

Absolute Brilliance is committed to respect internationally recognized human rights throughout our operations and supply chains. In line with the UN Guiding Principles on Business and Human Rights, our Policy is based upon the international standards enshrined in the Universal Declaration of Human Rights and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

Human rights refer to a set of basic rights and freedoms that belong to every person in the world, regardless of where they are from, what they believe or how they choose to live their life. It is a broad concept, with economic, social, cultural, political and civil dimensions. For Absolute Brilliance, respecting human rights means ensuring that any person involved in, or coming into contact with, our operations, supply chains and products is treated with dignity, respect, fairness and equality.

Our Policy sets out overarching principles for how we conduct business at Absolute Brilliance. Together with our employees and business partners, we are committed to drive forward the implementation of this Policy throughout our operations and supply chains. We recognize unique challenges to these standards may arise and we will work to address these challenges in partnership with relevant partners and stakeholders.

1. Employment is freely chosen
2. Freedom of association
3. Working conditions are safe and hygienic
4. Child labor shall not be used
5. Living wages are paid
6. Working hours are not excessive
7. No discrimination is practiced
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed

Absolute Brilliance will continuously work to embed this Policy throughout the relevant processes and procedures of the company to ensure its effective implementation.

We recognize that we must take steps to identify and address any actual or potential adverse impacts, whether they are directly or indirectly linked to our business activities or relationships. We understand that human rights due diligence is a dynamic, on-going process which requires acting on the findings, tracking our actions, and communicating to our stakeholders how we address impacts.

As our human rights risks and impacts may vary over time, this policy will be subject to review if proven inadequate by our human rights due diligence process.

Dov Lisker  
Director of Operations  
January 27, 2025

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## OECD Supplier Information Yearly Report

Absolute Brilliance, Inc. has conducted a Supply Chain review per the OECD (Organisation for Economic Co-operation and Risk Development) standards to meet due diligence guidelines for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas (CAHRAs) for the year 2024.

Absolute Brilliance, Inc. has found its suppliers in Diamonds and minerals to be responsive in completing due diligence forms to satisfy risk-related issues relating to OECD. We have not found any red flags when dealing with our suppliers.

Review of Absolute Brilliance, Inc.'s completed due diligence was conducted and matched the internal investigation results.

For more information regarding the OECD results, please contact us at 212-768-4747 or [dov@absolutebrilliance.com](mailto:dov@absolutebrilliance.com).

Dov Lisker  
Director of Operations  
January 27, 2025

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## Compliance with RJC COP 2019 Standards

Absolute Brilliance, Inc. has established policies and is compliant with the due diligence standards of the RJC COP 2019 relating to the below COP categories for the period of 2024:

Anti Bribery & Facilitation payments  
Anti Money Laundering and Finance of Terrorism  
Adherence to the Kimberley Process and World Diamond Council System of Warranties  
Supply Chain Policy-OECD-CAHRA's  
Diamonds & Gemstones to be purchased from responsible and legitimate sources  
Company policy with regards to synthetic diamonds  
Security of People and Products  
Sexual Harassment Policy  
Product Integrity Practices  
Human Rights  
Health & Safety Performance  
Community Relations  
Environmental Performance  
Relationship with Business Partners  
Statement of commitment to RJC policies and procedures  
Commitment to employee policies manual

Absolute Brilliance, Inc. has completed and is compliant with its Human Rights Due Diligence annual review for the period of 2024 per the RJC COP 2019 standards.

Dov Lisker  
Director of Operations  
January 27, 2025

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## Annual Reporting 5.1– Checklist

<b>Company Name:</b>	Absolute Brilliance, Inc.
<b>Date:</b>	February 2025
<b>Reporting period:</b>	January 2024-January 2025
<b>OECD Due Diligence Guidance</b>	<b>Action taken</b>
<b>Step 1: Establish strong company management systems</b>	
<b>1.A</b> Adopt, and clearly communicate to suppliers and the public, a company policy for the supply chain of minerals originating from conflict-affected and high-risk areas.	Supply chain policy sent to all suppliers and customers, as well as posted on company website. Policy includes all regulations dealing with OECD's and CAHRA's.
<b>1.B</b> Structure internal management systems to support supply chain due diligence.	Dov Lisker manages the internal supply chain and makes final decisions if any issues have arisen.
<b>1.C</b> Establish a system of controls and transparency over the minerals supply chain.	All suppliers must complete and KYC and also list sourcing origins for product supplied to Absolute Brilliance. In addition, suppliers must complete Supplier conformance documents, following RJC guidelines, thereby supplier agrees to required sourcing protocols. Diamond invoices must contain System of Warranties.
<b>1.D</b> Strengthen company engagement with suppliers.	Supplier pamphlet recommends our suppliers continue up the supply chain to have their suppliers agree and establish similar protocols that we have established based on RJC. Our supply chain protocols include ability to work with any suppliers with infractions to adjust to our standards. RJC certification is on our emails and website, promoting the ideals of RJC.
<b>1.E</b> Establish a company-level, or industry wide, grievance mechanism as an early warning risk-awareness system.	Grievance mechanism has been established and is posted online and in the office.
<b>Step 2: Identify and assess risk in the supply chain</b>	
Identify and assess risks in the supply chain and assess risks of adverse impacts.	Risk reviews have been conducted on our supply chain relating to all aspects of the business model. No red flags have been identified this year. Precautions are in place to identify any Lab Grown diamonds from suppliers who sell natural and Lab Grown.
<b>Step 3: Design and implement a strategy to respond to identified risks (if applicable)</b>	
Report findings of the supply chain risk assessment to the designated senior management of the company.	Dov Lisker is responsible for dealing with any red flags in our risk assessments. No red flags identified.
Devise and adopt a risk management plan.	Risk protocols are documented to identify any red flags and what would happen if red flags are found.
Implement the risk management plan and monitor performance of risk mitigation efforts.	No red flags found at this time.
Internal training	Staff training was conducted on Supply chain procedures and establishing new suppliers.
Communications	Yearly report sent stakeholders and posted online to update on policies and if any red flags have been identified that have not been corrected.
<b>OPTIONAL INFORMATION ON Step 4: Carry out independent third-party audit</b>	
RJC COP audit	COP 19 in 2022. Recertification to take place in 2025.
Grievances and remediation	No grievances reported.

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## Responsible Jewellery Council (RJC) Policy

Absolute Brilliance, Inc. is a wholesaler of polished loose diamonds.

We have one location which is 581 Fifth Ave, 5<sup>th</sup> Floor, New York, NY 10017.

Absolute Brilliance is a certified Member of the Responsible Jewellery Council (RJC).

The RJC is a standards-setting organization that has been established to advance responsible ethical, human rights, social and environmental practices throughout the diamond, colored gemstones, gold, silver and platinum group metals (PGM's) jewelry supply chain.

The RJC has developed a benchmark standard for the jewelry supply chain and credible mechanisms for verifying responsible business practices through third party auditing.

As an RJC Member we commit to operating our business in accordance with the RJC Code of Practices which is available at [www.responsiblejewellery.com](http://www.responsiblejewellery.com). We commit to integrating ethical, human rights, social and environmental considerations into our day-to-day operations, business planning activities and decision-making processes.

Specific policies relate to:

- Anti Bribery & Facilitation payments
- Anti Money Laundering and Finance of Terrorism
- Adherence to the Kimberley Process and World Diamond Council System of Warranties
- Supply Chain Policy-OECD-CAHRAs
- Diamonds to be purchased from responsible and legitimate sources
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Absolute Brilliance's RJC policy is available upon request for public viewing.

Dov Lisker  
Director of Operations  
January 28, 2025

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## Supply Chain Complaint Form

<b>Name of Company</b>	
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<b>Date of the Complaint</b>	
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Description of Supply Chain complaint:

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How has the complaint been resolved?

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Comments:

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<b>Authorized Signature</b>		<b>Date</b>	
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Absolute Brilliance ensures that the person / company filing this grievance shall do so without fear of blowback, retaliation, dismissal or harassment. The grievance filed shall remain confidential.

Send complaint to Fax: 212-869-9078 Att: Dov Lisker, [dov@absolutebrilliance.com](mailto:dov@absolutebrilliance.com) or hand deliver

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## Supply Chain Grievance Procedure

Absolute Brilliance has established this employee grievance procedure to hear concerns about Corporate Human Rights violations, circumstances in its workplace, operations, statements, supply chain procedures or OECD supply chain involving diamonds and precious metals from conflict-affected and high-risk areas.

Mr. Dov Lisker is responsible for implementing and reviewing this procedure.

Concerns can be raised by interested parties via fax, email or telephone to:

Dov Lisker

Tel: 212-768-4747

Fax: 212-869-9078

Email: [dov@absolutebrilliance.com](mailto:dov@absolutebrilliance.com)

On receiving a complaint, we will aim to:

- get an accurate report of the complaint;
- Senior management will review complaint and consult (via web or attorney) how to implement corrective actions;
- explain our complaints procedure;
- find out how the complainant would like it handled;
- decide who is the appropriate person internally to handle the complaint, or help redirect the complaint to another entity, such as the relevant supplier, or a relevant industry body;
- where the issue can be handled internally, seek further information where possible and appropriate;
- identify any actions we should take, or monitor the situation;
- If corrective actions are required, they will be implemented in policies and procedures;
- advise the complainant of any decisions or outcomes; and
- keep records on complaints received, and the internal process followed, for at least five years.

Absolute Brilliance ensures that the person / company filing this grievance shall do so without fear of blowback, retaliation, dismissal or harassment. The grievance filed shall remain confidential.

This grievance procedure has been approved by senior management and is available online.

Dov Lisker

Director of Operations

January 28, 2025

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