



RJC Annual Report of Due Diligence in Supply Chain for the year 2024-25

Company Name: Continental Jewellery (MFG) Ltd

Report Subject: Review of Due Diligence (OECD Guidance) & RJC COP Compliance

Report Date: 30 October 2025

Reporting Period: 1 Oct 2023 to 30 Sep 2025

As a member of the Responsible Jewellery Council, Continental recognizes the need to establish and continually improve good business practices as set by the Council's Compliance international standards on responsible practices for diamonds, colored gemstones, gold, silver and platinum group metals.

The Code of Practices encompasses, but is not limited to the areas of ethical, human rights, labour rights, social and environmental impact, and product disclosure. Continental continues to engage in responsible business practices through annual training, due diligence, and cooperation with the various compliance members in the jewellery industry.

Continental is committed to adhering to the RJC's Code of Practices as well as submitting to routine audits that are performed to ensure compliance.

The report is distributed to the Management, Heads of Sales & Marketing, Purchasing, Human Resources & Administration, JM Factory/Production and related business partners if needed.

1. Company Management Systems

Continental remains committed to responsible sourcing, human rights, and conflict-free supply chains, in alignment with OECD guidance and the latest RJC COP requirements. Our due diligence process is regularly updated to reflect changes in RJC COP, including new requirements for supply chain transparency, human rights due diligence, and environmental stewardship. Policies for responsible mineral supply chains are published internally and updated to meet revised COP standards. Key policies include:

- Corporate Management Procedures
- Human Rights, Safety & Occupation Health Management
- Environmental Management Procedures
- Preventing Bribery Money Laundering Management Procedure
- Goods Security Management Procedures
- Complaint Workflows of Supply Chain for all relevant materials (Gold, Platinum, Palladium, Color Stones, Diamonds)
- Product Information Disclosure



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We communicate our updated policies to suppliers and stakeholders, emphasizing compliance with the latest RJC COP and OECD guidelines.

We maintain compliance with the RJC COP standards and ensure all materials are sourced from legitimate, conflict-free suppliers. Supplier relationships are strengthened through ongoing communication and capacity-building for due diligence.

Regular training is provided for buyers, sales teams, and supporting staff, including modules on the revised COP requirements such as human rights, anti-bribery, and environmental impact.

Internal meetings are conducted to review and update company policies. Karen Cheung, Director of Sales & Marketing, and Eric Choi, Director of Operations, are accountable for COP compliance as well as the maintenance of due diligence and compliance policies.

2. Risk Management and Responsible Supply Chain Policy

Continental conducts risk assessments, follows precautionary measures, and applies Know Your Counterparty (KYC) processes according to international standards and the OECD Due Diligence Guidance. These protocols are consistently used at every stage of our supply chain — upstream, midstream, and downstream — to help identify, prevent, and reduce possible risks that could impact our business or stakeholders.

As part of this commitment, we have established a Responsible Supply Chain Policy, which has been formally communicated to all suppliers and stakeholders. This policy sets expectations for ethical conduct, human rights, labor rights, environmental management, and anti-corruption practices, ensuring alignment with the Responsible Jewellery Council (RJC) Code of Practices.

During the report period, Continental conducted a comprehensive supplier due diligence exercise covering the entire supply chain. The assessment confirmed that no red flags were identified among any of our suppliers. This outcome demonstrates the effectiveness of our KYC and risk management system and reflects the strong compliance and ethical practices maintained across our business partners.

All identified risks are communicated to senior management, accompanied by comprehensive details and mitigation strategies. Due diligence findings are systematically reviewed and updated to ensure responsiveness to evolving COP requirements. As of the reporting date, no substantial risks have been detected within the supply chain for the specified period.



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Continental remains committed to continuously monitoring and improving its risk assessment framework to ensure that our supply chain operates with transparency, accountability, and responsibility at all times.

3. Goods Security

Continental has implemented a comprehensive security system to safeguard our products and ensure that they are delivered to customers safely and reliably. Within our premises, surveillance and alarm devices are installed to monitor and protect the office and production areas. For logistics and distribution, all shipments are covered by insurance to safeguard against loss or damage, providing assurance to both the company and our customers.

To further enhance reliability, Continental collaborates only with trusted and internationally recognized freight couriers for the secure handling of our products. This includes the transportation of jewelry pieces for participation in major international exhibitions, where the highest level of security and professionalism is required.

Our Microsoft Dynamic ERP system has been upgraded to comprehensively track inventory and transactions, enabling retrospective identification of all material movements, including detailed information on suppliers, material type, quantity, and source.

Through these measures, Continental ensures that its products are not only manufactured with the utmost care and responsibility but are also protected throughout the supply chain, maintaining the trust and confidence of our customers and stakeholders worldwide.

4. Bribery, Corruption and Facilitation Payments

Continental has implemented a comprehensive Anti-Corruption Policy that applies to all employees as well as to our supply chain partners. This policy strictly prohibits employees from engaging in any form of bribery, corruption, or unethical facilitation payments. Where facilitation payments are legally unavoidable, they must be carried out in accordance with the law and in full transparency.

To ensure accountability, the policy also requires that any giving or receiving gifts, hospitality, or benefits must be properly recorded and disclosed. This measure helps prevent conflicts of interest and ensures full compliance with ethical business practices.

Throughout this reporting year, we organized training sessions on Bribery and Money Laundering prevention for relevant employees, focusing especially on our sales and purchasing staff. Our systems for oversight and reporting verified that no incidents of corruption, bribery, or facilitation payments occurred within the company or across its supply



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chain. This result demonstrates our steady commitment to operating with integrity, transparency, and full compliance with both the Responsible Jewellery Council (RJC) Code of Practices and all applicable laws.

Continental will continue to reinforce anti-corruption awareness among employees and suppliers through regular communication, training, and audits to maintain the highest standards of ethical business conduct.

5. Human Rights

Continental has established and implemented an internal Human Rights Policy that reflects our commitment to respect and uphold the fundamental rights of all individuals connected to our operations. We actively encourage our business partners and suppliers to adopt and implement human rights standards appropriate to their own businesses, ensuring alignment with frameworks of the Responsible Jewellery Council (RJC) Code of Practices.

Our ongoing monitoring and due diligence processes confirm that no violations of human rights have occurred in the past year or in previous years. This outcome demonstrates the effectiveness of our systems and the strong collaboration we maintain with our employees, stakeholders, and supply chain partners.

Continental remains dedicated to continuous improvement in the field of human rights, including awareness training, supplier engagement, and transparent reporting, to ensure that our operations and supply chain consistently operate with fairness, dignity, and respect for people.

6. Safety and Occupational Health

Continental places paramount importance on the health, safety, and well-being of every employee. We are dedicated to maintaining a workplace environment that adheres to Occupational Safety, Health, and Environmental standards as prescribed by relevant regulations.

The company has developed and implemented clear safety policies and procedures, which are communicated to all employees through induction programs, ongoing training, and internal awareness campaigns. These cover key areas such as emergency preparedness, fire prevention, safe use of machinery and equipment, personal protective equipment, chemical handling, and workplace ergonomics.



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To ensure effective safety management, the company conducts regular workplace inspections and risk assessments, supported by documented preventive measures. First aid kits and fire-fighting equipment are provided and maintained in accessible areas, and evacuation drills are carried out periodically to ensure readiness in case of emergencies. Furthermore, every accident, near-miss, or occupational health issue is documented, reported, and investigated to support ongoing improvement and prevent similar incidents from happening again. In this year, all production workers in our Jiangmen factory have passed the government-required health checks.

The safety committee, comprising representatives from both management and workers, meets regularly to review safety performance and propose further improvements. As a result of these efforts, Continental is pleased to report that no serious accidents or occupational health violations occurred during the reporting period. This outcome demonstrates our strong commitment to safeguarding our workforce and maintaining a safe and healthy working environment.

7. Environmental Management

Continental is committed to minimizing the environmental impact of its operations and continuously improving the efficiency of resource use. One of our initiatives includes the use of recycled material for packing jewelry sent to customers, ensuring that packaging contributes to waste reduction and supports a circular economy.

The company maintains detailed records of material and resource consumption, including office supplies, gasoline consumption, and electricity & water use. By systematically tracking these resources, we are able to monitor usage patterns, identify areas for improvement, and take steps to reduce unnecessary consumption.

To further reinforce sustainability, Continental has established procedures aimed at reducing overall consumption, particularly focusing on saving of energy and consumables. These initiatives are designed to contribute to the reduction of our carbon footprint, aligning with our long-term environmental responsibility objectives.

Our environmental management approach reflects compliance with the Responsible Jewellery Council (RJC) Code of Practices and supports the company's ESG policy related to responsible consumption, and sustainable communities. By embedding these practices into daily operations, Continental demonstrates its ongoing commitment to protecting the environment and promoting sustainable growth.



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8. Grievance Mechanism

Continental is committed to maintaining open lines of communication for employees and suppliers to express concerns. To enhance transparency and accountability, we have established a grievance system that enables stakeholders to submit claims anonymously and directly via email.

All grievances are reviewed, investigated, and handled by the right staff. We address root causes, act promptly, and ensure confidentiality, fairness, and protection from retaliation.

During the reporting period, there were no grievances submitted. Nevertheless, this mechanism continues to serve as an important resource for employees and suppliers, ensuring a safe, respectful, and empowering environment in which concerns can be raised.

By integrating these practices into daily operations, Continental continually affirms its commitment to transparency, accountability, and sustainable growth.

9. Independent Third-Party Audit

The company regularly holds management meetings and reviews to stay prepared for upcoming external RJC COP audits. All documentation and procedures have been updated to meet the latest requirements, ensuring readiness for the next audit.



Prepared by:

Eric Choi, Management Representative – Director of Operations

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