

FREDERICK GOLDMAN INC.

Frederick Goldman, Inc. Product Disclosure Policy

Purpose

The purpose of the policy is to define how Frederick Goldman, Inc. will disclose its printed and online materials to ensure honesty and transparency about the nature and quality of its products.

Policy

Product descriptions, illustrations, expressions, words, figures or depictions may not be untruthful, misleading or deceptive in representation or have any material omitted in the selling, advertising or marketing of any Diamond, Synthetic or Simulant and/or Gold or Platinum metal group jewelry products. All product information disclosed must be in accordance to the CIBJO Blue Book classifications and terminology. All representation of product must be disclosed in compliance with Applicable Law.

Gold and Platinum metal group fineness must be properly disclosed, using industry standard Quality Marks. Treated Diamonds shall be disclosed with the treatment in accordance to the CIBJO Blue Book classifications and terminology. Black Diamonds must be disclosed as heat treated. Wholly or partially Synthetic diamonds shall be disclosed as "Synthetic" and in accordance to the CIBJO Blue Book classifications and terminology. Simulants shall be disclosed in accordance to the CIBJO Blue Book classifications and terminology. When describing the weight, color, clarity or cut of Diamond and Synthetics, this shall be in accordance with the CIBJO Blue Book guidelines. Any safety or health information regarding Diamond, Synthetic, Gold or Platinum group product must be disclosed.

Selling diamond and/or gold and /or platinum group metals jewelry articles without disclosing full and accurate information about the product or providing misleading information, even unknowingly, is illegal and will result in disciplinary actions.

Reference Documents

- CIBJO Blue Books
- Frederick Goldman, Inc. RJC Product Disclosure Training ppt.
- Frederick Goldman, Inc. Product Disclosure Self-Audit Procedure
- Frederick Goldman, Inc. Assay Policy
- Frederick Goldman, Inc. Diamond QC Policy

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Responsibility

Group	Task
Human Resources	<ul style="list-style-type: none">• Training new/existing employees on Product Disclosure in Sales, Marketing, Product Data, Product Development, Merchandising
Marketing	<ul style="list-style-type: none">• Annual review of printed and web based marketing materials to ensure it is in accordance with FGI Product Disclosure Policy• New product release review of printed and online marketing materials to ensure it is in accordance with FGI Product Disclosure Policy
Quality Control	<ul style="list-style-type: none">• Validate all product is made in accordance to Quality Marks and Invoice claims.

DocuSigned by:
Lauren Calmas
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Lauren Calmas
SVP Marketing and Sales

1/27/2022

Date