



## **Supply Chain Policy**

- a) Recognize that sourcing from Conflict Affected and High-Risk Areas should be in accordance with OECD framework.
- b) Are committed to adopt and implement Conflict mineral policy in accordance with the Annex II of OECD guidelines
- c) Shall adopt a risk-based due diligence process for responsible sourcing of minerals from conflict-affected and high-risk areas.
- d) Will neither tolerate nor profit from, contribute to, assist or facilitate violation from conflict –affected regions.
- e) Shall only buy or sell diamonds that are fully compliant with the Kimberley Process Certification Scheme and, as such, will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring diamonds from, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates.
- f) Shall only buy or sell Metals / Gemstones / Minerals that doesn't provide direct or indirect support to non-state armed groups, including, but not limited to, procuring metals from, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates.
- g) We immediately stop engaging with suppliers if we find a reasonable risk that they are committing abuses or are sourcing from, or linked to, any party committing violations or providing direct or indirect support to non-state armed groups.
- h) Will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of minerals, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of diamonds / minerals.
- i) Will support and contribute to efforts to eliminate money laundering where we identify a reasonable risk resulting from, or connected to, the extraction, trade, handling, transport or export of diamonds / minerals.
- j) Shall implement the OECD Guidance Supplement on metals as applicable to our operations and Conflict minerals.
- k) Support transparency of government payments and rights-compatible security forces in the extractives industry.
- l) Shall respect human rights according to the Universal Declaration of Human Rights

and International Labor Organization Declaration on Fundamental Principles and Rights at Work.

- m) Will enable our stakeholders to voice concerns about the diamond & jewelry Conflict mineral.
- n) We shall implement the OECD Due Diligence Guidance Supplement on Gold as applicable to our operations.
- o) We commit to identifying and assessing risks in the gold supply chain and implementing a strategy to respond to identified risks, in accordance with the OECD five-step framework.
- p) We shall maintain robust records on suppliers, sources of gold, and due diligence efforts, and support third-party audits of our due diligence activities where appropriate.
- q) We commit to publicly reporting on our gold supply chain due diligence policies and practices on an annual basis.
- r) We shall not tolerate, profit from, contribute to, assist with, or facilitate the commission by any party of serious abuses associated with the extraction, transport or trade of gold, such as forced labor, child labor, and other gross human rights violations.
- s) We will take immediate steps to suspend or discontinue engagement with upstream suppliers found to be sourcing from or linked to parties involved in serious abuses or providing support to non-state armed groups.
- t) We will support transparency on all payments made to government authorities, and require the disclosure of such payments throughout our gold supply chain.
- u) We shall not offer or accept bribes and will resist the solicitation of bribes to disguise the origin of gold or to misrepresent government payments.

Dated 02<sup>nd</sup> May 2025

Compliance Officer

