

SURBHI DIAM LIMITED

Ethical Business Policy Document

Management

06/01/2025

HONG KONG

Surbhi Diam Limited

Policy Document	Rev. No. 01
Doc. No. SDL-001	Date: 06-01-2025

DOCUMENT APPROVAL

This Policy Document (SDL-001) is to define rules and regulation and way of working for the operations and activities of the company in relation to the requirements of Responsible Jewellery council and ethical business practice.

The contents of this document have been reviewed and approved by Director and subject to Annual review.

All internal and external stakeholders of Surbhi Diam Limited are required to be familiar with this document and follow the risk mitigating measures identified in this document.

Management is responsible to make changes / revisions to this document and all business partners and stake holder are advised to report any issues violating this document.

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Policy on Corporate social Responsibility

While we run our business based on the expectations of our diverse stakeholders, we also understand the importance of contributing to making the world a better place. At Surbhi Diam Limited, we strongly believe in the concept wherein the company contributes to building economic, social and environmental imperatives.

Corporate Social Responsibility (CSR) aims to contribute to societal goals of a philanthropic, activist or charitable nature or by engaging in or support volunteering or ethically oriented practices.

Our CSR Policy aims to the betterment of a sustainable society and this commitment is ingrained in our core values. We aim to demonstrate these through our actions governed by the CSR policy. This policy applies to our Company and its all activities and may also refer to our suppliers and partners.

Policy on Business Ethics and Transparency

- We will conduct our operations in an open, honest and ethical manner.
- We will ensure that all our operations are legitimate.
- We undertake to keep every partnership and collaboration open and transparent.
- We recognize the importance of protecting all our human, financial, physical, informational, social, environmental and reputational assets
- We will advise our partners, contractors and suppliers of our CSR Policy and will work with them to achieve consistency with the policy

Governance

Surbhi Diam Limited will undertake its CSR activities as approved by the CSR Committee, through a registered trust or society. The Company will assist the CSR Committee to identify the areas of CSR activities, programs and execution of initiatives as per the guidelines defined. The surplus funds if any arising out of the CSR activities will not form part of the business profit of the Company. The surplus funds will be used in the development of CSR projects in the following year. It will be mandatory for (Surbhi Diam Limited) to disclose its CSR Policy, programs/projects undertaken, and the expenditure made towards CSR activity. Following activities shall be carries out in 2025;

- Donation to Hospitals
- Financial support for social and cultural activities.

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Whistle-Blower Policy

The Surbhi Diam Limited has a set policy and Procedure document and firmly believes that it should be implemented in a true spirit with the involvement of all stake holders. Further, the company shall always involves all stake holder in the process of continues improvement and welcome reporting of any incident or observation of breach of policy and procedure from any third party of stake holder. At the same time company shall always believe that any person who reports the breach incident or observed any violation of policy should be provided adequate immunity against any adverse impact on his job or any threat to his/her life or any form of harassment and torture.

The company shall always maintain the confidentiality of the whistle blower and shall not disclose identity of the whistle blower without written consent from the whistle blower. The company shall always ensure that the person who has reported incident of violation for policy and procedure shall not be penalized or harassed or torture or threaten by any individual.

Business policies of company assure that all employees or third party who comes forward in good faith to report issues, that they will be treated fairly and respectfully. While all efforts will be taken to protect the anonymity of employees as far as practicable, any form of retaliation.

Against any such individuals, assuming they have not been involved in the violation will not be tolerated.

- a. Company encourages employees or any third party to voice concerns promptly, if they have a genuine reason to believe that a policy, company operation or practice is or will likely be in violation of any law, regulation or internal company rule or policy, including this. In case of any incident with the Whistle-Blower he/she can report to entity head and external lawyer on following number & Email.

surabhidiamltd@gmail.com

[Mr. Mehul Sidhpuria \(Advocate\): +919824113559 \(External Member\)](tel:+919824113559)

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Our employees, suppliers and other parties can report concerns and alleged violations of supply chain/sourcing/due diligence policy as follows: Reports can be made anonymously and will be kept confidential to the fullest extent practicable and allowed by law.

We will not take any retaliatory action against our employees, suppliers, or other parties who make a report in good faith.

Our suppliers are encouraged to contact if they wish to seek guidance on the application of this Policy.

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Policy Statement of Child Labour

- a. No form of child labour should be employed at Surbhi Diam Limited
- b. The minimum age for employment that will be applicable is fifteen (As per ILO Convention No. 138).
- c. For authorized adolescents (persons below 18 years of age but above 15 years), the entity management is responsible for providing working conditions, hours of work and wages in compliance with applicable local laws as a minimum.
- d. If a child is found working at Surbhi Diam Limited either own or subcontracted, the responsibility of rehabilitation will be undertaken by the management.
- e. The above policies will also be applicable to all business partners.

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Policy Statement of Forced Labour

The policies relating to this section are part of the Business Policies adopted by Surbhi Diam Limited and are presented below for reference:

- a. The management of Surbhi Diam Limited are fully committed to ensuring that forced or involuntary, bonded, indentured or prison labour, is not practiced nor used in any form at any of its facilities. Surbhi Diam Limited shall ensure that there is no restriction in the freedom of movement of employees and dependents. Any reported incidents relating to forced labour will be considered as a serious violation of the Business Policies.
- b. The following definitions will be applicable:
 - The Universal Declaration of Human Rights that states that *'No one shall be held in slavery or servitude'*

ILO Convention 29, which defines forced or compulsory labour as *'all work or service which is extracted from any person under the menace of any penalty, and for which the said person has not offered himself voluntarily'*

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Policy Statement Kimberley Process

The policies relating to this section are part of the Business Policies adopted by Surbhi Diam Limited are presented below for reference:

- a. Surbhi Diam Limited is fully committed to complying with all the requirements specified in the Kimberley Process Certification Scheme and World Diamond Council's (WDC) System of Warranties Declaration.
- b. The definition of 'Conflict Gemstone Diamonds' as agreed by the Kimberley Process will be adopted i.e.
"Rough diamonds used by rebel movements or their allies to finance conflict aimed at undermining legitimate Governments, as described in relevant United Nations Security Council (UNSC) resolutions in so far as they remain in effect, or in other similar UNSC resolutions which may be adopted in the future, and as understood and recognized in United Nations General Assembly (UNGA) Resolution 55/56, or in other similar UNGA resolutions which may be adopted in the future."
- c. Wherever applicable, the following affirmative statement as recommended by the World Diamond Council's System of Warranties should be printed on all the invoices:
- d. "The diamonds herein invoiced have been purchased from legitimate sources not involved in funding conflict, in compliance with United Nations Resolutions and corresponding national laws. The seller hereby guarantees that these diamonds are conflict free and confirms adherence to the WDC SoW Guidelines."
- e. Entering into transactions involving 'conflict diamonds' or not following the System of Warranties Declaration in invoices, either knowingly or unknowingly, will be considered as a violation of the Business Policies.
- f. Surbhi Diam Limited ensures that concerned personnel within the organization know about government restrictions on the trade in Conflict Diamonds, the Kimberley Process Certification Scheme and the World Diamond Council System of Warranties.

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Policy Statement General Employment, Working hours, Remuneration

- a. Surbhi Diam Limited complies with applicable national laws / regulations with respect to employment.
- b. Surbhi Diam Limited is committed to maintaining appropriate records as stipulated by the regulatory authorities for all staff employed, whether on a full time, part time or seasonal basis.
- c. Surbhi Diam Limited shall not require workers to work for more than the national limit of hours in a week on a regular basis, with overtime hours not to exceed the national permitted limit per week on a regular basis unless there are legal opt-outs.
- d. Surbhi Diam Limited shall ensure that wages and benefits for a standard working week shall meet at least national minimum standards and shall be sufficient to meet the basic needs of workers.
- e. Wages shall be paid to employees on a regular and predetermined basis in a manner and location convenient to employees, accompanied by a wage slip detailing wage rates, benefits and deductions as applicable.
- f. Surbhi Diam Limited shall ensure that due process of wage deductions shall be followed where applicable and it shall not be binding on employees to buy provisions from the group.
- g. When required, due recognition will be given to the existence, membership and lawful activities of worker representative bodies, and worker representatives will be given access to carry out their responsibilities / functions.
- h. Surbhi Diam Limited is committed to addressing the legitimate grievances of its employees.
- i. Surbhi Diam Limited shall follow proper procedure as per law for dismissal of employees, in case the need for the same arises, and arbitrary dismissal procedures shall be avoided.
- j. Information regarding applicable employment policies and working practices shall be communicated in a transparent manner to all employees.
- k. Surbhi Diam Limited is fully committed to the pursuance of the provision of fair and conducive employment conditions, consistent with applicable laws and regulations.

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Policy Statement Money Laundering and Finance of terrorism

The policies relating to this section are part of the Business Policies adopted by Surbhi Diam Limited is presented below for reference:

- a. Surbhi Diam Limited recognizes the fact that entities in the gems and jewelry sector have to take on the onus of analyzing their potential vulnerabilities to money laundering and implement specific steps that are required for protection against abuse by criminals.
- b. Strict compliance is required at all times, with all applicable national and, where appropriate, international laws / regulations with respect to money laundering, terrorism financing, bribery, corruption, smuggling, embezzlement, fraud, racketeering, transfer pricing and tax evasion.
- c. Surbhi Diam Limited shall act in accordance with national laws and national / international accounting standards with respect to maintaining financial accounts of all business transactions and auditing of its financial accounts.
- d. Surbhi Diam Limited ensures that concerned employees know and understand the relevant regulatory jurisdiction for national and international transactions, money laundering / financial offences related legal, regulatory and internal requirements as they apply to their jobs. Ignoring or not reporting suspicious activity that appears to be questionable may also be considered as a violation of the Business Policies, depending on the seriousness of the non-conformance.
- e. Surbhi Diam Limited implements a “Know your Customer” and “Know your Supplier” procedure that establishes the identity of all organizations with which it deals, have a clear understanding of their business relationships and have a reasonable ability to identify and react to transaction patterns appearing out of the ordinary or suspicious.

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Policy Statement of Freedom of association and Collective Bargaining, Discrimination and Discipline and Grievance Procedures

The policies relating to this section are part of the Business Policies adopted by Surbhi Diam Limited and are presented below for reference:

- a. Surbhi Diam Limited will not prevent employees from associating and collective bargaining
- b. Discrimination can mean distinction, exclusion or preference.
- c. Any form of discrimination relating to the hiring, discharge, pay, promotion and training of employees on the basis of race, ethnicity, caste, national origin, religion, age, disability, gender, marital status, physical appearance, sexual orientation, HIV status, Migrant status, membership of worker representative bodies, political affiliations, or any criteria that are unlawful is strongly discouraged by Surbhi Diam Limited and any such reported incidents will be viewed as a serious violation of this Business Policies.
- d. Surbhi Diam Limited will ensure that employees who have certain life threatening diseases or illnesses are not treated differently from other employees, and will continue to employ such personnel, as long as they are physically and mentally fit to attend to their normal job responsibilities.
- e. Individuals who are “Fit for Work” shall be accorded equal opportunities and shall not be discriminated against on the basis of factors unrelated to their ability to perform their job.
- f. Surbhi Diam Limited shall not use corporal punishment under any circumstances and will ensure that employees are not subjected to harsh or degrading treatment, sexual or physical harassment or other forms of mental or physical coercion, abuse or intimidation.
- g. Surbhi Diam Limited encourages all personnel to voice concerns promptly, if they have a genuine reason to believe that a policy, entity operation or practice is or will likely be in violation of any law, regulation or internal entity rule or policy, including this Business Policies. Surbhi Diam Limited assures all employees who come forward in good faith to report issues, that they will be treated fairly and respectfully. While all efforts will be taken to protect the anonymity of employees as far as practicable, any form of retaliation against any such individuals, assuming they have not been involved in the violation, will not be tolerated.

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Policy Statement of Product Integrity

- a. Surbhi Diam Limited is committed to complying with relevant trading standard legislation and specific national and local regulations applicable to its products.
- b. The following essential Policies will be applicable in all transactions of Surbhi Diam Limited involving diamonds, treated diamonds, synthetics and simulant
- **Disclosure** - Surbhi Diam Limited shall fully and accurately disclose the material characteristic of their products. All reasonable efforts shall be made to properly disclose all relevant information on the physical characteristics, such as mass/weight, cut, cut, colour, clarity or fineness, of a diamond or gold jewellery product.
 - **Misrepresentation** - No untruthful, misleading or deceptive statement, “representation” or material omission in the “selling”, “advertising” or distribution of any diamond, treated diamond, synthetic, or simulant, or any gold product, shall be made by the Group and its entities in any medium, including the internet
 - **Diamond Quality** - The weight, colour, clarity or cut of diamonds will be described in accordance with the recognized guidelines appropriate to the particular jurisdiction.
 - Full disclosure i.e. the complete and total release of all available information about a Diamond and all material steps it has undergone prior to sale to the purchaser, irrespective of whether or not the information is specifically requested and regardless of the effect on the value of the diamond.
 - No misuse of terminology or misrepresentations or attempts to disguise the product will be made in the selling, advertising and distribution of treated diamonds, synthetics and simulant.
 - The word ‘diamond’ will not be used in the case of names of firms, manufacturers or trademarks; in connection with treated diamonds or diamond simulant or synthetic Diamonds.
- c. Surbhi Diam Limited has adopted the following definitions:
Diamond: A diamond is a natural mineral consisting essentially of pure carbon

crystallized with a cubic structure in the isometric system. Its hardness in the Mohs scale is 10; its specific gravity is approximately 3.52; it has a refractive index of 2.42 and it can be found in many colours.

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Synthetic: A synthetic is any object or object that has been either partially or wholly crystallized or re-crystallized due to artificial human intervention such that, with the exception of being non-natural, the product meets the requirements specified in the definition of the word 'diamond' above.

Treated Diamond: A treated diamond is any object or product that meets the requirements specified in the definition of the words 'diamond' and 'synthetic' above, but has been subject to some form of treatment i.e. any process, enhancement changing, interfering with and/or contaminating the natural appearance or composition of a diamond other than historically accepted practices of cutting and polishing. This includes colour and decolourisation treatment, fracture filling, laser and irradiation treatment and coating.

Simulants: A diamond simulant is any object or product used to imitate some or all of the properties associated with a diamond and includes any material, which does not meet the requirements specified in the definition of the word 'diamond' above.

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Policy Statement Product Security

- a. Surbhi Diam Limited is committed to establish and implement product security measures within the premises and during shipments to protect against product theft, damage or substitution.
- b. The security and well being of employees, visitors and other relevant business partners is prioritized when establishing product security measures.

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Disclosure of Treated Diamonds, Synthetics and Stimulants Policy Statement

The policies relating to this section are part of the Business Principles adopted by Surbhi Diam Limited. and are presented below for reference:

The following essential principles will be applicable in all the entity's transactions involving treated diamonds, synthetics and stimulants.

- Full disclosure i.e. the complete and total release of all available information about a diamond and all material steps it has undergone prior to sale to the purchaser, irrespective of whether or not the information is specifically requested and regardless of the effect on the value of the diamond.
- Full disclosure to the purchaser will take place when offered for sale, such that
 - Full verbal disclosure will clearly take place during sale.
 - Full written disclosure will be conspicuously included on each bill of sale or receipt in plain language and readily understandable to the purchaser. Written disclosure will normally be in English language
- No misuse of terminology or mis-representations or attempts to disguise the product will be made in the selling, advertising and distribution of treated diamonds, synthetics and stimulants.
- The word 'diamond' will not be used in the case of names of firms, manufactures or trademarks; in connection with treated diamonds or diamond stimulants or synthetic diamonds."

" **Surbhi Diam Limited**" has adopted the following definitions:

Diamond: A diamond is a natural mineral consisting essentially of pure carbon crystallized with a cubic structure in the isometric system. Its hardness in the Mohs scale is 10; its specific gravity is approximately 3.52; it has a refractive index of 2.42 and it can be found in many colours.

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Synthetic: A synthetic is any object that has been either partially or wholly crystallized or re-crystallized due to artificial human intervention such that, with the exception of being non-natural, the product meets the requirements specified in the definition of the word 'diamond' above.

Treated Diamond: A treated diamond is any object or product that meets the requirements specified in the definition of the words 'diamond and synthetic' above, but has been subject to some form of treatment i.e. any process, enhancement changing, interfering with and/or contaminating the natural appearance or composition of a diamond other than historically accepted practices of cutting and polishing. This includes color and decolourisation treatment, fracture filling, laser and irradiation treatment and coating.

Stimulants: A diamond stimulant is any object or product used to imitate some or all of the properties associated with a diamond and includes any material, which does not meet the requirements specified in the definition of the word 'diamond' above.

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Policy Statement Bribery and Facilitation Payments

The policies relating to this section are part of the Business Policies adopted by Surbhi Diam Limited and are presented below for reference:

- a. Surbhi Diam Limited *is* committed to prohibit bribery in all business practices and transactions that are carried out by the company or on its behalf by business partners. The company will not offer, accept or countenance any payments, gifts in kind, hospitality, expenses or promises as such that may compromise the principles of fair competition or constitute an attempt to obtain or retain business for or with, or direct business to, any person; to influence the course of the business or governmental decision – making process.
- b. Surbhi Diam Limited considers Bribery Risk as it applies to its organization (including agents) to identify which areas pose high risks. Surbhi Diam Limited has developed appropriate methods to monitor conduct of employees and agents and eliminate bribery based on this understanding.
- c. The management of Surbhi Diam Limited facilitates the reporting of incidences of attempted bribery or inappropriate gifts within their organization and shall apply appropriate sanctions for bribery and attempted bribery in all forms.
- d. Surbhi Diam Limited ensures that no employee will suffer demotion, penalty or other adverse consequences for voicing a concern, or for refusing to pay a bribe or facilitation payment even if this action may result in the enterprise losing business.

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Policy Statement Community Engagement and Development

- The policies relating to this section are part of the Business Policies adopted by Surbhi Diam Limited and are presented below for reference:
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- Surbhi Diam Limited is committed to the development of communities where it operates, contributing to their social and economic welfare.

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Policy Statement Environmental protection, Use of Energy and natural resources

The policies relating to this section are part of the Business Policies adopted by Surbhi Diam Limited and are presented below for reference:

Surbhi Diam Limited is committed to effective environmental performance and will focus on the following initiatives:

- Conduct business in an environmentally responsible manner.
- Compliance with all applicable environmental laws and regulations
- The impact of our operations on the environment will be assessed and reviewed periodically to mitigate or eliminate such impact.
- Disposal procedures for waste generated will be clearly defined and practiced in line with standards that are set by law.
- Improvement of employee environmental awareness and performance through training.
- Efficient use of energy and natural resources to minimize waste generation through efforts that include recycling and prevention of pollution.
- Commitment to a continual improvement process in environmental management

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Policy Statement Health and Safety

The policies relating to this section are part of the Business Policies adopted by Surbhi Diam Limited and are presented below for reference:

Surbhi Diam Limited recognizes the need to develop a sustainable, value creating business and is committed to the following in the areas of workplace health and safety:

- Providing safe and healthy working conditions for all employees in accordance with applicable law and other relevant industry standards.
- Any adverse impact of our business processes on those who carry it out shall be identified and eliminated. Towards this end, we will systematically review our operations to identify sources of health and safety related risks.
- We will provide adequate and appropriate labeling and storage of all chemicals and cleaning materials and adopt methods to protect employees from exposure to airborne particles and chemical fumes
- Our review of our processes will use appropriate standards as required by prevailing laws, expert opinion, feedback from workers and our knowledge of best practices. The review will lead to formulation of clearly described work practices and safety drills and appropriate safeguards and isolation from mobile equipment. All our staff will be trained in the manner required to adhere to these work practices and drills.
- Workers shall not be under the influence of or abusing, drugs, alcohol and/ or other illegal substances.
- We will seek to substitute the use of material, which are known to cause an adverse impact on the health of workers or health of consumers in the course of its use.
- All workplaces will be constructed to meet safety standards with local regulations as the minimum standards that will be applicable.
- We will take adequate measures to safeguard our employees from fire and other workplace injuries.
- All products sold by Surbhi Diam Limited to consumers shall comply to applicable regulations of product health and safety.

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Policy Statement of Human Rights

The policies relating to this section are part of the Business Policies adopted by Surbhi Diam Limited and are presented below for reference:

- a) All employees in Surbhi Diam Limited will be treated with equality, respect and dignity.
- b) Surbhi Diam Limited believes in and respects fundamental human rights according to the United Nations Universal Declaration of Human Rights.
- c) Surbhi Diam Limited will not interfere in the right of employees to observe tenets or practices based on caste, race, national origin, gender, religion, disability, union membership, or political affiliation
- d) Surbhi Diam Limited strongly discourages any form of sexually coercive, threatening, abusive or exploitative behavior.
- e) Any reported incidents relating to direct or indirect physical, sexual, racial, religious, psychological, verbal, or any other form of harassment or abuse, or any other form of intimidation or degrading treatment will not be tolerated by the Group.
- f) Security personnel, if employed by Surbhi Diam Limited are trained to respect the human rights and dignity of all people and use of minimum force proportionate to the perceived threat.
- g) Human rights risk assessment shall be done annually covering internal and external stakeholders.
- h) The company shall conduct human right risk assessment and upon any violation observed internal or external stake holders, company shall develop and implement risk mitigation plan according to severity of incident. The company may seek assistance from external NGO's or experts to develop and implement mitigation plan and monitoring.
- i) The company shall provide support and consultation to external stakeholders upon written request by the business partners.

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Policy Statement Use of Security Personnel

The policies relating to this section are part of the Business Policies adopted by Surbhi Diam Limited and are presented below for reference:

Security personnel, if employed by Surbhi Diam Limited are trained to respect the human rights and dignity of all people and use of minimum force proportionate to the perceived threat.

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Ethical Business practice and Supply chain Compliance

The Policy promote the standards that we expect all of our suppliers to comply with when producing and supplying Diamonds to Surbhi Diam Limited, no matter where they operate in the world.

The senior management of Surbhi Diam Limited advocate this policy and we shall review as and when changes in the process or compliance requirement or any violation of sourcing policy or Changes in risk and due diligence criteria. We shall carry out review of this entire document at least annually.

We recognise that full compliance with these criteria may take time for some suppliers, and we are committed to working with our suppliers to implement improvement plans and help them achieve compliance.

Surbhi Diam Limited is committed to working in partnership with its suppliers to help achieve compliance with this Policy.

All the supplier should comply with national and international law and trade requirement like RJC with respect to Bribery and Corruption, Financial Offence, Labour Rights, Kimberley process and World Diamond Council – SoW, Product disclosure, Labour Rights, Working Condition, Child labour, Forced labour, Human rights, Discrimination, Fair wages and working hours, Environment compliance, Health and safety of the employees and visitor.

Policy – Supply Chain and Ethical Sourcing

At Surbhi Diam Limited, we take Ethical business practice, social and environmental factors into consideration in making decisions on the procurement of Rough or polish diamonds.

This Policy shows company’s commitment and its expectations for its product suppliers regarding actions to address Conflict Diamonds. We hereby inform all our suppliers to provide first mine of origin for the

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material they supply to us. We request all our suppliers not to supply any material that is subject to restriction as per EU Reg. 833/2014.

Surbhi Diam Limited expects its suppliers to have in place policies and due diligence measures that will enable us to reasonably assure that diamonds supplied to us containing conflict free diamonds are not belongs to Conflict-affected and high-risk areas – CAHRAs .

We being a responsible company, Surbhi Diam Limited supports the goal of the Dodd-Frank Act of preventing armed groups in the conflict affected and high risk countries from benefitting from the sourcing of Conflict diamonds from that region.

Surbhi Diam Limited is committed to working with its suppliers to educate them on these matters and concerning steps they can take to obtain increased transparency regarding the origin of diamonds mined or manufacture and sell to Surbhi Diam Limited. Surbhi Diam Limited reserves the right to evaluate the extent to which a supplier has failed to reasonably comply with this Policy.

Surbhi Diam Limited reserves the right to request additional documentation from its suppliers regarding the origin/source of diamonds sold to Surbhi Diam Limited.

Suppliers who do not reasonably comply with this Policy shall be reviewed by Surbhi Diam Limited 's for future business.

Surbhi Diam Limited is committed to ensuring that our supply chain is free of any diamonds which was procured for the support or benefit of armed and anti-social conflict groups or involving serious abuses of human rights and non-compliant with OECD Guidelines.

Surbhi Diam Limited clearly criticizes such activity and will reject any material which we believe was obtained involving serious human rights

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violations or which benefitted or supported armed rebels or terrorist groups through illegal finance or other activities.

The company shall carry out risk assessment for its supply chain and shall not enter into any business relationship or if may require then shall suspend/discontinue the engagement with any such supplier involved in dealing with Conflict-Affected and High-Risk areas, Any form of Human Right Violation; Torture, Cruel, In-Human and Degrading Treatment; Forced/Compulsory Labour; Child Labour; Abuses such as widespread Sexual Violence; War Crimes; other serious violations of International Humanitarian Law, Crime against Humanity; Genocide and/or To Bribe or To be Bribed. We strictly condemn and prohibit any Direct/Indirect support to public/private security forces which illegally Control, Tax or Extort money from Mining Sites, Transportation Routes and Upstream Sectors.

The Company shall carry out due diligence to assess risks related to procurement from the Conflict-affected and high-risk areas – CAHRAs and shall always source from compliant miners/traders.

We shall always set reasonable efforts to source Diamonds from miners and traders validated as being Conflict Free and require their direct and indirect suppliers to do the same;

We strive to work supportively with our customers and supply chain partners in implementing conflict free compliance programs for Diamond Supply chain.

Policy – Due Diligence and Risk Assessment

The company shall always undertake to ensure that the extraction and trade of diamond support peace and development, not conflict.

Surbhi Diam Limited remains committed to enhance its Supply Chain Due Diligence program through internal review and external assessments. We have zero tolerance policy for the supplier violating OECD due diligence guideline and we shall immediately stop commercial relationship if any of

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our business associates found non-compliant or High-Risk during our internal/external risk assessment.

All the suppliers are also requested to carry our risk assessment and due diligence for their suppliers and products they are sourcing.

Currently Surbhi Diam Limited procure it's diamonds from RJC CoP/Ethical business practice compliant miners/traders. However, we have established a strong due diligence process and we shall review it as an when we observed significant risk or upon receipt of any grievance or complaint but in normal course, we shall carry our due diligence process on annual basis.

Identify red-flags and Risk

The company has checked transaction methods and name and individuals of company on SDN list of USA treasury and EU sanction list. All the suppliers are found low in risk and in compliance with OECD requirement of CAHRA's.

Risk mitigation plan

- ✓ Company shall always deal with legitimate company.
- ✓ Always complete due diligence and risk assessment before establishing commercial relationships.
- ✓ Make sure that do transaction shall be carried out with business sense.
- ✓ Immediately stop commercial relationship upon any violation observed an report to concerned internal and external reporting authority.
- ✓ Continuously monitor suspicious transactions and red flag records
- ✓ Communication and awareness to suppliers

Supplier Risk Assessment /Due Diligence Report

We the senior management of Surbhi Diam Limited and compliance officer has verified all our supplier with respect to following ;

Date: 06/01/2025
Place: Hong Kong

Surbhi Diam Limited

Policy Document	Rev. No. 01
Doc. No. SDL-001	Date: 06-01-2025

OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

US OFAC Sanctions

EU Sanctions

Global Peace Index

Know Your Country

Transparency International (TI)

The Office of the United Nations High Commissioner for Human Rights (OHCHR)

<http://www.responsiblemineralsinitiative.org/minerals-due-diligence/risk-management/conflict-affected-and-high-risk-areas/>

Publication (Detailed report is with Compliance team and may produce to concerned parties upon request)

Compliance team of Surbhi Diam Limited has completed the due diligence and Risk assessment of all its Diamond supplier with respect to latest RJC guideline and OECD requirements and we found all our supplier are complying with requirements not found any risk pertaining to their business involvement in Conflict Affected and high risk Areas' (CAHR's). The company has also conducted ethical business compliance of its operations, and it is being regularly evaluated on quarterly basis. Compliance report for internal audit is being retained by the management of the company. Overall, the company has complied with ethical business practice and adhered to the implemented policies and procedures in last assessment period.

Date: 06/01/2025

Place: Hong Kong

Date: 06/01/2025

Place: Hong Kong