



# Ethical Supply-Chain Policy

# SUPPLY CHAIN POLICY

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1. This policy confirms **SHIVAM JEWELS**'s commitment to respect human rights, avoid contributing to the finance of conflict and comply with all relevant UN sanctions, resolutions and laws.
2. **SHIVAM JEWELS** is a certified member of the Responsible Jewellery Council (RJC). As such, we commit to proving, through independent third-party verification, that we:
  - a) respect human rights according to the Universal Declaration of Human Rights and International Labour Organization Fundamental Rights at Work;
  - b) do not engage in or tolerate bribery, corruption, money laundering or finance of terrorism;
  - c) support transparency of government payments and rights-compatible security forces in the extractives industry;
  - d) do not provide direct or indirect support to illegal armed groups; and
  - e) enable stakeholders to voice concerns about the jewellery supply chain.
  - f) are implementing the OECD 5-Step framework as a management process for risk based due diligence for responsible supply chains of minerals from conflict-affected and high-risk areas.
3. Regarding serious abuses associated with the extraction, transport or trade of diamonds/coloured gemstones:

We will neither tolerate nor profit from, contribute to, assist or facilitate the commission of:

- a) torture, cruel, inhuman and degrading treatment;
- b) forced or compulsory labour;
- c) the worst forms of child labour;

- d) human rights violations and abuses; or
- e) war crimes, violations of international humanitarian law, crimes against humanity or genocide.

4. Regarding direct or indirect support to non-state armed groups:

We only sell or purchase diamonds/coloured gemstones 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/coloured gemstones from, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates who illegally:

- a) control mine sites, transportation routes, points where diamonds/coloured gemstones are traded and upstream actors in the supply chain; or
- b) tax or extort money or diamonds/coloured gemstones at mine sites, along transportation routes or at points where diamonds/coloured gemstones are traded, or from intermediaries, export companies or international traders.

5. Regarding public or private security forces:

We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of diamonds/coloured gemstones, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of diamonds.

6. Regarding money laundering:

We 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/coloured gemstones.

7. A senior manager and current compliance officer, Mr. Arunkumar Mangaldas, has been assigned responsibility for ensuring supply chain compliance.
8. **SHIVAM JEWELS** will ensure that training of management and all relevant employees is done at least annually.
9. **SHIVAM JEWELS** is also committed to be audited by an independent third party to ensure adequate testing of the system to ensure that the verification and documentation process is secure.
10. **SHIVAM JEWELS** communicates this sourcing policy to our suppliers and customers and makes it publicly available for review. Additionally, Company Name requires the customer to acknowledge the policy and commit to providing information, documentation, and accommodations for site visits as necessary to complete our due diligence as outlined in our basic due diligence and enhanced due diligence policies.
11. If **SHIVAM JEWELS** should discover, through its ongoing due-diligence that our customer is engaging in suspect practices or practices do not meet our responsible sourcing requirements, we would immediately suspend sourcing from the identified supplier and develop a plan to mitigate the identified risks. Should the mitigation fail to resolve a matter to our satisfaction or we uncover activities which indicate extreme abuses, dishonesty, or situations where a supplier is unwilling to assist in our due-diligence, Company Name will immediately discontinue any activity with that entity.
12. **SHIVAM JEWELS** is also committed to be audited by an independent third party to ensure adequate testing of the system to ensure that the verification and documentation process is secure. Through these audits, **SHIVAM JEWELS** displays transparency and our customers gain audit-based assurance that **SHIVAM JEWELS**'s supply chain due diligence policy is verifiable and effective.
13. **SHIVAM JEWELS** communicates this sourcing policy to our suppliers and customers and make it publicly available for review. Additionally, **SHIVAM**

**JEWELS** requires the customer to acknowledge the policy and commit to providing information, documentation, and accommodations for site visits as necessary to complete our due diligence as outlined in our basic due diligence and enhanced due diligence policies.

14. The company shall review this policy on yearly basis or if there is a changed in sourcing practices.

Partner  
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**SHIVAM JEWELS**

Date: January 1<sup>st</sup>, 2021

