

Company's Policy on Supply Chain

Preamble:

This policy has been embraced with reference from policy guidance provided under Annex D1.1 of RJC COP 07 as per specific recommendation offered under the OECD Guidance.

Policy statement	Ref of Supply Chain template
1. Venus Jewel operates only from two locations viz. Mumbai and Surat, India. It primarily procures rough diamonds at Surat facility and after manufacturing polished diamonds out of rough diamonds, it transfers polished diamonds to its Mumbai facility from where it is exported as well as sold locally. Venus Jewel confirms its commitment to – a. Respect human rights b. Avoid contributing to the finance of conflict and c. Comply with all the UN sanctions, resolutions and laws.	<u>Tool 1A.2.</u> <u>Clause 1</u>
2. With Venus Jewel being certified member of the Responsible Jewellery Council (RJC), we commit to proving and through independent third party verification - a. To respect human rights according to the Universal Declaration of Human Rights and International Labour Organization, Declaration on Fundamental Principles and Rights at Work; b. To refrain from engaging in or tolerate bribery, corruption, money laundering or finance of terrorism; c. To support transparency of government payments and rights-compatible security forces in the extractives industry; d. To refrain from providing direct or indirect support to illegal armed groups; e. To enable stakeholders to voice concerns about the supply chain including jewellery; f. To implement OECD 5-step framework as a management process for risk-	<u>Tool 1A.2.</u> <u>Clause 2</u>

Policy statement	Ref of Supply Chain template
based due diligence for responsible supply chains from conflict-affected and high-risk areas.	
3. We commit to use our influence to prevent abuses by others through best endeavours by communicating: a. Appropriate actions to restrain and build a zero tolerance mechanism towards bribery, corruption, money laundering or finance of terrorism; b. Appropriate measures to manage and restrict human rights violations and abuses, forbid any kind of inhuman and degrading behavior, treatment or any kind of cruelty or torture; c. Appropriate measures to restrict child labour or forces labour; d. Appropriate measures to circumvent adverse impact on ethical and legal framework in respect to human rights considerations including impact on the basic rights as to life, liberty, and personal security; e. Forbid situation of potential distinction of race, caste, creed, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership, or influential affiliation; f. Providing just and decent working conditions, legitimate and fair remuneration, to rest and reasonable limitation of working hours and periodic holidays. g. Apt measures to protect the right to privacy, social security, right to represent, to form and to join any union / association and to resign for protection of self-interests. h. The strict policy of Venus Jewel not contributing to conflict by respecting Human Rights and/or responsible business practices by not indulging in any business transaction/s with conflict-affected and high risk areas that may include inter-state insurgency and security disturbed areas, illegally and forcefully occupied states, unstable areas classified by UNSC, NSAG and other such bodies, armed conflict areas and other such high risk areas.	<u>Tool 1A.2.</u> <u>Clause 3</u>

Policy statement	Ref of Supply Chain template
4. Venus Jewel is committed to its policy on Business partners and 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.	<u>Tool 1A.2.</u> <u>Clause 4</u>
5. In adherence to its policy, Venus Jewel will immediately stop engaging with upstream suppliers, if it finds a reasonable risk that the respective supplier(s) is/are committing abuses described in paragraph 4. above or are sourcing from, or linked to, any party committing these abuses.	<u>Tool 1A.2.</u> <u>Clause 5</u>
6. Regarding direct or indirect support to non-state armed groups: In adherence to its policy, Venus Jewel buys or sells diamonds that are fully compliant with the Kimberley Process Certification Scheme and System of Warranties, 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 who illegally: a. control mine sites, transportation routes, points where diamonds are traded and upstream actors in the supply chain; or b. tax or extort money or diamonds at mine sites, along transportation routes or at points where diamonds are traded, or from intermediaries, export companies or international traders.	<u>Tool 1A.2.</u> <u>Clause 6</u>
7. In compliance to its policy, Venus Jewel, will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are sourcing from, or are linked to, any party providing direct or indirect support to non-state armed groups as described in paragraph 6. above.	<u>Tool 1A.2.</u> <u>Clause 7</u>

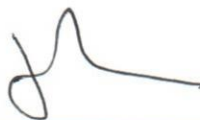
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8. Regarding public or private security forces: Venus Jewel upholds that the role of public or private security forces is to provide security to workers, facilities, equipment and property in accordance with the rule of law, including law that guarantees human rights. In accordance with its policies, Venus Jewel will not provide direct or indirect support to public or private security forces that commit abuses described in paragraph 4. or that act illegally, as described in paragraph 6. above.	<u>Tool 1A.2.</u> <u>Clause 8</u>
9. Regarding bribery and fraudulent misrepresentation of the origin of minerals: In compliance with its company policy, Venus Jewel 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 minerals.	<u>Tool 1A.2.</u> <u>Clause 9</u>
10. Regarding money laundering: In compliance with its company policy, Venus Jewel, will support and contribute to efforts to eliminate money laundering where it identifies a reasonable risk resulting from, or connected to, the extraction, trade, handling, transport or export of diamonds / colored gem stones.	<u>Tool 1A.2.</u> <u>Clause 10</u>

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