

**2026**



# **CORE JEWELLERY PRIVATE LIMITED**

**ETHICAL BUSINESS POLICY DOCUMENT MANAGEMENT**



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| Doc. No. CORE JEWELLERY PVT. LTD. 001 |          | Date: 10-04-2026 |

## DOCUMENT APPROVAL

The following is a description of the policies and approval of policies and procedures that apply to the business partners, internal and external stake older and employees. These are defined as group level policies and company level policies should not contradict this policy document.

Scope of Materials: Diamonds/Coloured Gemstones/Gold/Silver/Platinum Group Metals/ Lab Grown Material

Applicable Standard: RJC CoP 2024/RJC CoC 2024 and RJC LGMS 2025.

| Company Name             | Applicable Standards                        |
|--------------------------|---------------------------------------------|
| CORE JEWELLERY PVT. LTD. | RJC CoP 2024/RJC CoC 2024 and RJC LGMS 2025 |
| CORE JEWELLERY PVT. LTD. | RJC CoP 2024                                |

This Policy Document (CORE JEWELLERY PVT. LTD. 001) is to define rules and regulation and way of working for the operations and activities of the company the Company CORE JEWELLERY PVT. LTD. 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 the Company, CORE JEWELLERY PVT. LTD. 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 holders are advised to report any issues violating this document.

The Company is committed to the highest standards of ethical conduct and integrity in its business activities. Every employee and individual acting on the Company's behalf is responsible for maintaining the Company's reputation and for conducting company business honestly and professionally.

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## RJC Compliance Policy

CORE JEWELLERY PVT. LTD., the Company is a member of Responsible Jewellery Council – RJC and committed for ethical business practices and compliance with Code of Practices in all its business activities.

The management of CORE JEWELLERY PVT. LTD., the Company shall implement responsible ethical, social and environmental practices throughout the diamond supply chain, from mine to retail. We are a responsible entity of diamond supply chain believe in consumer confidence in our trade and request our business partners to follow same. As a part of best endeavors and responsible business entity, we anticipate co-operation of our business partners in adopting the standard and ensuring that the entire diamond supply chain is compliant with respect to business, social and environmental responsibilities. CORE JEWELLERY PVT. LTD., being RJC member with Jewellery manufacturing activity shall comply with RJC Code of Practice and Chain of Custody requirements. CORE JEWELLERY PVT. LTD. diamonds being diamond trading company is complying with RJC Code of Practice.

We strongly encourage all our business partners to follow and implement the various requirements of the RJC code of practice and other prevailing trade standards.

More information about the Compliance Program is available on <http://www.responsiblejewellery.com>.

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## Policy on Corporate Social Responsibility

Social responsibility allows the company's business interests to be reconciled with the legitimate interests of the different stakeholders that may be affected, and also assumes the impact of the company's activities on the community in general and the environment.

CORE JEWELLERY PVT. LTD., the Company maintains a high standards and ethical value when it comes to business. We only deal to those who abide the law and with a high ethical reputation in this industry. As a member of Responsible Jewellery Council (RJC), we follow the practical guidance on performing due diligence pertaining to responsible supply chain management of diamond when sourcing from conflict-affected and high risk areas.

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 the Company, 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

CORE JEWELLERY PVT. LTD., the Company 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 (the Company) to disclose its CSR Policy, programs/projects undertaken, and the expenditure made towards CSR activity. Following activities shall be carried out;

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

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## Whistle-Blower Policy

CORE JEWELLERY PVT. LTD, the Company 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 involve 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 the 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 tortured or threaten by any individual.

The business policies of the 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 Email.

kamal@corejewellery.com

shripal\_06@yahoo.co.in

In case if employee wants to register their grievance externally , they can contact the relevant

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department using following link [DIRECTORATE OF PUBLIC GRIEVANCES https://dpg.gov.in](https://dpg.gov.in) or <https://giepc.org> or else search on google for website of relevant department.

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 fully kept confidential, 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. The company shall take all reasonable action with respect to any such report in 15 working days and put all possible efforts to completion of timely investigation and resolution of complaints and grievances.

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

The company has provided training to management and personnel about the complaints and grievance mechanism, including instructions on the respectful handling of all grievances.

Senior management along with experience compliance team shall be involved at the appropriate level who understand the sensitivities of the situation.

The company shall ensure that the mechanism or any resultant resolutions do not waive or preclude the individual's or group's right to have the same grievance addressed through other available external mechanisms, including administrative, judicial or other non-judicial remedies.

Retain records of complaints and grievances, including responses and outcomes, in a manner that protects the confidentiality and integrity of those filing the grievance, including where anonymity has been requested.

Upon resolution of grievance/suggestion feedback is invited to determine whether corrective actions can be implemented to prevent or mitigate similar grievances in the future.



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## Equality, Diversity & Inclusion Policy Statement.

CORE JEWELLERY PVT. LTD, the Company recognizes that we are all unique, whether in terms of our background, personal characteristics, experience, skills or motivations, and the Company value its people for the differences they bring. These differences, this diversity is powerful.

CORE JEWELLERY PVT. LTD, the Company is committed to building a culture that values openness, fairness, and transparency with a workforce that is truly representative of communities in which it operates and where employees feel respected and able to achieve their potential. Fostering an inclusive culture helps everyone to benefit from a wider range of different perspectives, experiences, and skills. The Company believes that this creates a happier, more productive working environment for all.

This policy statement applies to anyone working for the Company. This includes employees, workers, contractors, and apprentices. The policy also relates to job applicants and is relevant to all stages of the employment relationship.

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## Ethical Business Policy Statement

CORE JEWELLERY PVT. LTD, the Company is committed to the highest standards of ethical conduct and integrity in its business activities. Every employee and individual acting on the Company's behalf is responsible for maintaining the Company's reputation and for conducting company business honestly and professionally.

This policy outlines the Company's position on prohibiting and preventing bribery, fraud, dishonesty, and illegal activity. The Senior Management take a zero-tolerance approach and are committed to enforcing effective systems throughout the company to prevent, monitor and eliminate any form of dishonesty and consider that such activities have a detrimental impact on business by undermining good governance and distorting free markets.

This policy applies to all employees of the Company, and business partners and external stakeholders. Every employee and associated person acting for, or on behalf of, the Company is responsible for maintaining the highest standards of business conduct. Any breach of this policy will be treated as grounds for serious disciplinary action, and / or constitute a contractual and criminal matter for the individual concerned. The Company is committed to transparency and believes that fair conduct helps to foster deep relationships of trust between the Company and our business partners and customers and as such a breach of this policy may also cause serious damage to the reputation and standing of the Company.

In compliance with statutory legislations and to embed commitment to integrity and honesty the Company will not sanction the following: –

Give or offer any payment, gift, hospitality, or other benefit in the expectation that a business advantage will be received, or to reward any business received.

Accept any offer from a third party that is known or suspected to be made with the expectation that the Company will provide a business advantage for their business or anyone else.

Give or offer any payment to a Government official in any country to facilitate or speed up a routine or necessary procedure.

Tangible assets and intangible assets such as computer systems, bespoke processes, software, intellectual property, trade secrets and confidential information shall not be used for unauthorized or unlawful purposes or for personal gain.

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Engage in any business practice which is unethical or amounts to unfair competition.

Unlawfully or inadvertently acquire, use or disclose to any third party any proprietary information or intellectual property of another party.

Engage in any activity or business practice whether unilaterally or in conjunction with any other party which is in breach of any applicable competition and/or anti-trust law in the relevant jurisdiction.

Unlawfully induce any party to breach a contract with any third party.

Make false statements about a competitor's products and/or services.

Engage in business with service providers, agents or representatives that do not support our ethical business objectives.

The success of the Company's measures depends on all employees, and those acting for the Company, playing their part in helping to detect and eradicate dishonesty. Therefore, all employees and others acting for, or on behalf of, the Company are encouraged to report any suspected dishonesty in accordance with the procedures. The Company will support any individuals who make such a report, if it is made in good faith.

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## Modern Slavery Statement

This statement sets out the Company actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

As part of the diamond supply chain, we recognize that we have a responsibility to take a robust approach to slavery and human trafficking and we continue to take our responsibility very seriously during the coronavirus pandemic.

The senior management is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

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## Quality Policy Statement

It is the objective of CORE JEWELLERY PVT. LTD. to succeed in business by delivering Client satisfaction and value for money.

To realise this policy objective, Directors and senior management are committed to:

Determining our clients' needs through collaborative working, to understand their specific requirements and provide high quality products and services that will at least meet their expectations, if not exceed them.

Ensuring we work in partnership with ethical supply chains to ensure the sustainability of our business, exercising social responsibility, whilst reducing, if not eliminating, any adverse impacts of our business on people or our environment.

Encouraging engagement with all staff to identify opportunities that improve our operating practices, involve them in process enhancements and embrace their enthusiasm to develop more efficient working methods and foster advancement.

Measuring and monitoring our processes and performance to ensure that we operate efficiently and economically and continually improve.

Providing adequate resources, including management representatives, to fulfil the Company's commitments.

Maintaining and continually improving our Business Management System meeting the requirements of customers and other applicable standards we subscribe to.

Complying with all relevant legislation and where possible improving on these requirements.

Promoting a culture of quality awareness and responsibility, through effective leadership, communication and training.

Identifying the needs and expectations of our Interested Parties relevant to our Management Systems and considering how they affect our business.

This policy is communicated to all persons working for or on behalf of the Company and is made available to other interested parties upon request.

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## Information Security & Data Protection Policy Statement

CORE JEWELLERY PVT. LTD. shall ensure appropriate technical and organizational measures are taken to prevent unauthorized or unlawful processing of personal data and commercially sensitive information, and to safeguard against accidental loss or destruction of, or damage to same.

To reassure our business partners and other interested parties of our commitment to protecting, securing and controlling systems and data, the company security controls are verified by independent experts and certified to the Government backed scheme 'Cyber Essentials'.

The Company will act to ensure that measures are implemented to protect the integrity of information, such measures shall include:

Protecting computer networks, all desktop and portable computers and handheld devices with user log-in credentials, complex passwords and, where appropriate, biometrics.

Protecting networks from any damaging executables or scripts introduced by portable media, not limited to, but such as memory sticks and optical storage.

Utilization of Anti-Virus, Anti-Malware and Anti-Adware programs that are updated to the latest database definitions.

Firewalls to protect against unwanted intrusion into networks, servers, computers and hand held devices.

Maintaining information to ensure that it is accurate and complete.

Copies of back-ups are kept off-site using controlled and secure procedures. Adherence to contracts with our clients that contain strict no-publicity clauses and thus photographic media taken on clients' premises and sites will not be used or displayed without explicit permission to do so.

Communicating Confidentiality Agreements and Non-Disclosure Agreements to relevant personnel.

Promoting good security practices and training those whom we employ, providing guidance, awareness and advice on the importance of protecting confidential and sensitive information.

Limited and monitored employee access to Social media and networking. Enacting disciplinary action against any employee who jeopardizes the security and confidentiality of information/data entrusted to the company.

Communication Logs that are only accessible by authorized personnel shall be retained for the purpose of fault diagnosis and user support.

By implementing the above security measures, we shall comply with business, contractual, and regulatory requirements, including those of the General Data Protection Regulation.

This policy is communicated to our supply chain, relevant interested parties and all those working for, or on behalf of, the company.

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## Policy Statement of Child Labour

- No form of child labour should be employed at CORE JEWELLERY PVT. LTD.
- The minimum age for employment that will be applicable is fifteen (As per ILO Convention No. 138).
- 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.
- If a child is found working at CORE JEWELLERY PVT. LTD. either own or subcontracted, the responsibility of rehabilitation will be undertaken by the management.
- 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 CORE JEWELLERY PVT. LTD. and are presented below for reference:

The management of CORE JEWELLERY PVT. LTD. 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. CORE JEWELLERY PVT. LTD. 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.

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 CORE JEWELLERY PVT. LTD. are presented below for reference:

CORE JEWELLERY PVT. LTD. 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.

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."

Wherever applicable, the following affirmative statement as recommended by the World Diamond Council's System of Warranties should be printed on all the invoices:

"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."

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.

CORE JEWELLERY PVT. LTD. 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

- CORE JEWELLERY PVT. LTD. complies with applicable national laws / regulations with respect to employment.
- CORE JEWELLERY PVT. LTD. 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.
- CORE JEWELLERY PVT. LTD. 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.
- CORE JEWELLERY PVT. LTD. 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.
- 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.
- CORE JEWELLERY PVT. LTD. 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.
- 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.
- CORE JEWELLERY PVT. LTD. is committed to addressing the legitimate grievances of its employees.
- CORE JEWELLERY PVT. LTD. 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.
- Information regarding applicable employment policies and working practices shall be communicated in a transparent manner to all employees.
- CORE JEWELLERY PVT. LTD. 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 CORE JEWELLERY PVT. LTD. is presented below for reference:

CORE JEWELLERY PVT. LTD. 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.

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.

CORE JEWELLERY PVT. LTD. 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.

CORE JEWELLERY PVT. LTD. 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.

CORE JEWELLERY PVT. LTD. 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.

### Key Regulations

In India, gems and jewellery dealers with an annual turnover of ₹2 crore or more must comply with the Prevention of Money Laundering Act (PMLA), 2002. Mandatory compliance includes KYC for transactions above ₹2 lakh, reporting cash transactions exceeding ₹10 lakh to FIU-India, maintaining records for 5 years, and monitoring high-risk clients to prevent terrorist financing.

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## Key Regulations and Compliance Requirements.

**Applicability:** Dealers in precious metals and stones (DPMS) with a turnover exceeding ₹2 crore in the previous financial year.

### Mandatory Reporting (FIU-India):

**Cash Transactions:** All cash transactions totalling over ₹10 lakh, whether in one or multiple linked transactions.

**Suspicious Transactions:** Any transaction suspected to involve proceeds of crime must be reported within seven working days.

### Know Your Customer (KYC) Norms:

Mandatory for all cash transactions of ₹2 lakh and above.

Required documentation includes Aadhaar, PAN card, or equivalent KYC documents to verify the client's identity.

**Record Maintenance:** Transaction records must be maintained for at least 5 years.

**Internal Compliance:** Businesses must develop internal policies to identify high-risk clients and train staff to detect suspicious activities.

**Penalty:** Non-compliance can lead to actions by the Enforcement Directorate (ED), including fines or seizure of properties involved in money laundering, as per the PMLA Regulations via Indian Jeweller.

### Other Applicable Laws

**Unlawful Activities (Prevention) Act (UAPA), 1967:** Prohibits doing business with individuals on sanctioned or terrorist lists.

**Income Tax Act, 1961:** Restricts cash transactions over specific limits (e.g., Section 269ST prohibits cash receipt of ₹2 lakh or more from a person in a day).

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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 the Company and are presented below for reference:

CORE JEWELLERY PVT. LTD. will not prevent employees from associating and collective bargaining

Discrimination can mean distinction, exclusion or preference.

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 CORE JEWELLERY PVT. LTD. and any such reported incidents will be viewed as a serious violation of this Business Policies.

CORE JEWELLERY PVT. LTD. 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.

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.

CORE JEWELLERY PVT. LTD. 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.

CORE JEWELLERY PVT. LTD. 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. CORE JEWELLERY PVT. LTD. 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 individual, assuming they have not been involved in the violation, will not be tolerated.

CORE JEWELLERY PVT. LTD. strictly prohibit all forms of discrimination, harassment and bullying and violation. No employees or visitors shall be allowed to discriminate, harassment be it verbal or physical and bullying any individual. The group requests all individual to behave respectfully and adhere to the policy.

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The group ensure that there are equal opportunities for all individuals who are fit to work provided for all aspects of employment, including recruitment, wages, benefits, promotions, training, transfer, termination, and retirement.

Freedom of association is a fundamental right in India, guaranteed under the Constitution, which allows employees to form unions and associations to protect their interests, and employers to form associations. For companies in India, this right is primarily regulated by constitutional provisions, statutory labor laws, and upcoming consolidated labor codes.

### Key Applicable Regulations and Laws

**Constitution of India (Article 19(1)(c)):** Guarantees all citizens the fundamental right to form associations, unions, or cooperative societies.

**Trade Unions Act, 1926:** The primary legislation governing the registration, management, and rights of trade unions.

**Industrial Disputes Act, 1947:** Governs the resolution of disputes between employers and employees and recognizes the role of unions in collective bargaining.

**Industrial Relations Code, 2020 (Upcoming):** This code, once fully in effect, will replace the Trade Unions Act, 1926, and introduce formal concepts like "negotiating unions" or "negotiating councils" based on membership percentage (51% or more for sole representation).

**State-Specific Legislations:** Certain states have specific laws, such as the Maharashtra Recognition of Trade Unions and Prevention of Unfair Labour Practices Act, 1971 and the Kerala Recognition of Trade Unions Act, 2010.

### Key Principles and Obligations for Companies

**Right to Form and Join:** Workers have the right to form and join unions of their choice without previous authorization or fear of intimidation.

**Non-Interference:** Employers must not interfere in the formation or functioning of employee unions and must respect their rights to collective bargaining.

**Recognition of Unions:** While the Trade Unions Act does not explicitly mandate union recognition, the Industrial Relations Code, 2020, will formalize the process of identifying a negotiating union or council.

**Unfair Labour Practices:** Employers are restricted from discriminating against workers for union membership, including dismissals or retaliatory actions.

**Freedom of Association Policies:** Many companies in India adopt specific "Freedom of Association and Collective Bargaining Policies" to ensure compliance with International Labour Organization (ILO) standards and UN Global Compact principles.

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## Policy Statement of Product Integrity

CORE JEWELLERY PVT. LTD. is committed to complying with relevant trading standard legislation and specific national and local regulations applicable to its products.

The following essential Policies will be applicable in all transactions of the Company involving diamonds, treated diamonds, synthetics and stimulant

**Disclosure** - CORE JEWELLERY PVT. LTD. 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.

**CORE JEWELLERY PVT. LTD. 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.

**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

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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.

**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.

**Lab Grown Material:** Any reference to lab-grown materials within this standard shall be understood as meaning lab-grown diamonds and lab-grown colored gemstones (emeralds, rubies and sapphires), used within the jewellery and watch supply chain, and within an RJC member’s certification scope. This includes any lab-grown materials that are: • whole or partial, composite (assembled), constructed, restructured; • coatings (on natural or lab-grown stones); and • rough, polished and recycled.

## Policy Statement Product Security

CORE JEWELLERY PVT. LTD. is committed to establish and implement product security measures within the premises and during shipments to protect against product theft, damage or substitution.

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 CORE JEWELLERY PVT. LTD. 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."

**CORE JEWELLERY PVT. LTD.** 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.

**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,

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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.

This control system is applicable for company, a trading company and Scope of the materials are laboratory grown diamonds with Gold/Silver Jewellery. The company has implemented policy and procedure for the segregation of Laboratory grown diamonds with other materials including natural diamonds. The entity deals in laboratory grown diamonds studded Jewellery. Following are the identified contaminations points where laboratory grown diamonds could contaminate with natural diamonds or natural diamond studded Jewellery;

Contamination during Transportation Inventory

Dispatch and Sales documentation

The company has implemented robust segregation system within premises to ensure that at no level laboratory Grown Diamonds and contaminated with natural diamonds.

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## Policy Statement Bribery and Facilitation Payments

The policies relating to this section are part of the Business Policies adopted by CORE JEWELLERY PVT. LTD. and are presented below for reference:

1. CORE JEWELLERY PVT. LTD 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.
2. CORE JEWELLERY PVT. LTD considers Bribery Risk as it applies to its organization (including agents) to identify which areas pose high risks. the Company has developed appropriate methods to monitor the conduct of employees and agents and eliminate bribery based on this understanding.
3. The management of CORE JEWELLERY PVT. LTD 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.
4. CORE JEWELLERY PVT. LTD 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.

## Policy Statement Community Engagement and Development

The policies relating to this section are part of the Business Policies adopted by CORE JEWELLERY PVT. LTD and are presented below for reference:

CORE JEWELLERY PVT. LTD 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 CORE JEWELLERY PVT. LTD and are presented below for reference:

CORE JEWELLERY PVT. LTD is committed to effective environmental performance and will focus on the following initiatives:

1. Conduct business in an environmentally responsible manner.
2. Compliance with all applicable environmental laws and regulations
3. The impact of our operations on the environment will be assessed and reviewed periodically to mitigate or eliminate such impact.
4. Disposal procedures for waste generated will be clearly defined and practiced in line with standards that are set by law.
5. Improvement of employee environmental awareness and performance through training.
6. Efficient use of energy and natural resources to minimize waste generation through efforts that include recycling and prevention of pollution.
7. 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 CORE JEWELLERY PVT. LTD and are presented below for reference:

CORE JEWELLERY PVT. LTD recognizes the need to develop a sustainable, value creating business and is committed to the following in the areas of workplace health and safety:

1. Providing safe and healthy working conditions for all employees in accordance with applicable law and other relevant industry standards.
2. 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.
3. 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
4. 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.
5. Workers shall not be under the influence of or abusing, drugs, alcohol and/ or other illegal substances.
6. 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.
7. All workplaces will be constructed to meet safety standards with local regulations as the minimum standards that will be applicable.
8. We will take adequate measures to safeguard our employees from fire and other workplace injuries.
9. All products sold by CORE JEWELLERY PVT. LTD 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 CORE JEWELLERY PVT. LTD. and are presented below for reference:

1. All employees in CORE JEWELLERY PVT. LTD. will be treated with equality, respect and dignity.
2. CORE JEWELLERY PVT. LTD. believes in and respects fundamental human rights according to the United Nations Universal Declaration of Human Rights.
3. CORE JEWELLERY PVT. LTD. 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
4. CORE JEWELLERY PVT. LTD. strongly discourages any form of sexually coercive, threatening, abusive or exploitative behavior.
5. Any reported incidents relating to direct or indirect physical, sexual, racial, religious,
6. 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.
7. Security personnel, if employed by CORE JEWELLERY PVT. LTD. are trained to respect the human rights and dignity of all people and use of minimum force proportionate to the perceived threat.
8. Wherever any violation of human rights are observed, the company shall take mitigation action and if needed hire an external non-governmental organization for the implementation.
9. Human rights risk assessment shall be done annually covering internal and external stakeholders.
10. The group shall conduct human right risk assessment and upon any violation observed internal or external stakeholders, 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.
11. The group 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 CORE JEWELLERY PVT. LTD and are presented below for reference:

Security personnel, if employed by CORE JEWELLERY PVT. LTD are trained to respect the human rights and dignity of all people and use of minimum force proportionate to the perceived threat.

## Provenance Claims

The policies relating to this section are part of the Business Principles adopted by CORE JEWELLERY PVT. LTD. and are presented below for reference: "The company shall ensure all its Provenance Claims made will be fully valid along with available evidence to support the Claim(s)"

Origin - Geographical origin of material, for example country, region, mine or corporate ownership of the Mining Facility/ies; and/or DTC Diamonds...

Source - Type of source, for example recycled, mined, artisanally mined, or date of production; and/or

Provenance Claims may also relate to origin, sources or practices that are specifically excluded from the supply chain, such as through a 'negative warranty'.

The company shall ensure that all claims and statements (made to consumers or other businesses) on practices in the supply chain and the origin or source of Diamonds, Synthetics, Gold and / or Platinum through the use of both descriptions and symbols are valid.

The company shall ensure that there will be no attempt to mislead consumers through illustrations, descriptions, expressions, words, figures, depictions or symbols relating to the Provenance Claim(s).

The company shall ensure that all the relevant employees are aware about the provenance claim and its procedures. The group has implemented policy and procedure for following provenance claim.

"Based on written assurance from our suppliers, CORE JEWELLERY PVT. LTD, states that diamonds have not been originated from the MBADA and Marange resources of Zimbabwe. The diamonds herein invoiced are not sourced from artisanal mines."

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## Policy of Lab Grown Material

The requirements for establishing responsible business practices throughout the jewellery and watch supply chain, for handling laboratory grown materials

The LGMS is comprised broad objectives:

1. To improve legal and regulatory compliance, strengthen public reporting and secure a commitment to responsible business practices.
2. To increase the use of due diligence in supply chains to uphold human rights, support community development, promote anti-corruption efforts and manage sourcing risks.
3. To adequately control and disclose information about products and so avoid misleading or deceptive marketing practices.
4. To protect the health and safety of both people and environments and to use natural resources efficiently.
5. To better comply with international labour conventions and ensure responsible working conditions.
6. Any reference to lab-grown materials within this standard shall be understood as meaning lab-grown diamonds and lab-grown coloured gemstones (emeralds, rubies and sapphires), used within the jewellery and watch supply chain, and within an RJC member's certification scope. This includes any lab-grown materials that are: • whole or partial, composite (assembled), constructed, restructured; • coatings (on natural or lab-grown stones); and • rough, polished and recycled
7. Members shall disclose information on the physical characteristics of the products listed in LGMS 27.1 in compliance with applicable law. Unless a conflict with applicable law exists, members shall apply the following requirements to support disclosure about physical characteristics: a. Laboratory grown materials: Wholly or partially laboratory-grown materials shall be disclosed as 'laboratory grown', 'laboratory created', '[manufacturer name] – created', and/or 'synthetic'. Abbreviations such as 'lab-grown' or 'lab-created' are also acceptable. The description shall be equally as conspicuous as the word 'diamond' or the name of the colored gemstone. i. In the case of coating, the material being coated must be disclosed as 'coated [name of material]'
8. Composites: Composite (or assembled) lab-grown materials constructed of two or more parts shall be disclosed as 'composite', 'assembled', 'doublet' or 'triplet', and by the correct name of the material of which it is composed. The use of the term 'diamond/ gemstone' or 'laboratory/created/synthetic diamond/gemstone' in relation to such stones is unacceptable. The description shall be equally as conspicuous as the name of the material used. Members shall not use terms and definitions that are misleading in relation to composite (assembled) stones and/or conceal information about their parts. c. Reconstructed stones: Reconstructed stones using lab-grown materials shall be disclosed as such and the description shall be equally conspicuous as the name of the material. d. Simulants (or imitation): Any product used to imitate the appearance of lab-grown materials without having their chemical composition, physical properties and/or their structure shall be disclosed as 'imitation' or 'simulant' along with the correct name of the material of which it is composed, for example, 'x compound', 'glass', 'plastic'. The description shall be equally as conspicuous as name of the lab-grown material. Simulants must not be referred to as laboratory grown or laboratory created. e. Descriptions of polished lab-grown materials: Describe the dimension or carat weight, color, clarity and cut of lab-grown diamonds and colored gemstones in accordance with the recognized guidelines appropriate to the particular jurisdiction. f. Enhancements: Any part of the growth/manufacturing process or subsequent enhancements to the created material that are deemed to be unstable and/or non permanent in nature shall be disclosed. g. Product health and safety information: Any relevant health and safety information about the materials listed in LGMS 27.1 in jewellery products sold by members to end consumers shall be disclosed. This includes irradiated lab-grown materials.



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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/Gold/Silver/Platinum/Lab Grown Materials to CORE JEWELLERY PVT. LTD. no matter where they operate in the world. We hereby inform all our suppliers to provide first mine of origin for the 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.

The senior management of CORE JEWELLERY PVT. LTD. 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.

CORE JEWELLERY PVT. LTD. 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.

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## Policy – Supply Chain and Ethical Sourcing

At CORE JEWELLERY PVT. LTD. , 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.

CORE JEWELLERY PVT. LTD. expects it's 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, CORE JEWELLERY PVT. LTD. 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.

CORE JEWELLERY PVT. LTD. 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 the CORE JEWELLERY PVT. LTD. CORE JEWELLERY PVT. LTD reserves the right to evaluate the extent to which a supplier has failed to reasonably comply with this Policy.

CORE JEWELLERY PVT. LTD reserves the right to request additional documentation from its suppliers regarding the origin/source of diamonds sold to CORE JEWELLERY PVT. LTD.

Suppliers who do not reasonably comply with this Policy shall be reviewed by the CORE JEWELLERY PVT. LTD's for future business.

CORE JEWELLERY PVT. LTD. 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.

CORE JEWELLERY PVT. LTD. clearly criticizes such activity and will reject any material which we believe was obtained involving serious human rights 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/Jewellery Supply chain.

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## Policy – Due Diligence and Risk Assessment

The company shall always undertake to ensure that the extraction and trade of diamond/colored gemstone/gold/silver/pgm support peace and development, not conflict.

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

The company has established this complaints procedure to hear concerns about circumstances in the supply chain/ethical business practice. Compliance officer is responsible for implementing and reviewing this procedure. Concerns can be raised by interested parties via email or telephone to: [Compliance Officer - Mr. Chirag Shah] [Contact Number – 022 40771000 E-mail – chirag@corejewellery.com]

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

Currently CORE JEWELLERY PVT. LTD procure it's diamonds/gold/silver/pgm/colored gemstone 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 CORE JEWELLERY PVT. LTD. and compliance officer has verified all our supplier with respect to following;

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

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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 the Company has completed the due diligence and Risk assessment of all its metals and Minerals supplier with respect to latest RJC guideline and we found all our supplier are complying with requirements did not find any risk pertaining to their business involvement in Conflict Affected and high risk Areas' (CAHR's).

**RJC CoP/CoC Annual Compliance - 2025:** The company has carried out ethical business practice and carried out policy and procedure review with respect to its implementation. The company has complied with the latest RJC Code of Practice /Chain of Custody and LGMS and all its requirement. **Ethical**

**Standard/Commitment--** No practice or conduct observed during the assessment period that brings the diamond industry into disrepute. All businesses practices have adhered to national laws and applicable rules and regulation during the assessment period.

We have conducted risk assessment and due diligence of all our suppliers and customers with respect to latest OECD requirements and RJC guideline and we found all our supplier are complying with requirements did not find any risk pertaining to their business involvement in Conflict Affected and high-risk Areas' (CAHR's).

| Sr# | Description                                                                 | Comments |
|-----|-----------------------------------------------------------------------------|----------|
| 1   | Is the company dealing with any illegitimate customers/suppliers?           | No       |
| 2   | Any violation of CAHRA's during last one year?                              | No       |
| 3   | Dealing with any illegitimate business partners?                            | No       |
| 4   | Any incident of Human right violation or financial offence observed?        | No       |
| 5   | Suppliers are complying with OECD requirements?                             | Yes      |
| 6   | Any material sourced from Violated area?                                    | No       |
| 7   | Any unethical business practice observed in any business partners activity? | No       |
| 8   | Over all Suppliers Risk assessed in assessment period?                      | Low      |

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## Due Diligence and Risk Assessment Report

| N o. | Steps                                                                                                                                                    | Source of Verification                                                                                                                                                                                                                                                                                       | Classifica tion of Risk | Risk Mitigation Action                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|------|----------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1    | Serious abuses associated with the extraction, transport or trade of Minerals                                                                            | To ensure these all ethical assurance of the seller we verify through supplier information questionnaire, UN social security information, supplier diamond sourcing practice policies other procedures along with their due diligence report and KYC documents along with the declarations pertaining to it. | Low                     | Any confrontation with such violation by any of supplier;<br>The management of the company shall immediately inform to Ministry of mines of Local government.<br>The company shall procure materiel from socially compliant suppliers and company shall verify details in Public domains to validate compliance with the risk defined.<br>The company shall obtain self-declaration from the supplier for the compliance of OECD guidelines. Updated list of Conflict affected areas :<br><a href="https://www.knowyourcountry.com/copy-of-country-reports">https://www.knowyourcountry.com/copy-of-country-reports</a><br><a href="https://www.knowyourcountry.com/human-trafficking">https://www.knowyourcountry.com/human-trafficking</a> |
|      | 1) any forms of torture, cruel,inhuman and degrading treatment;                                                                                          |                                                                                                                                                                                                                                                                                                              | Low                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|      | 2) any forms of forced or compulsory labor;                                                                                                              |                                                                                                                                                                                                                                                                                                              | Low                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|      | 3) the worst forms of child labor;                                                                                                                       |                                                                                                                                                                                                                                                                                                              | Low                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|      | 4) other gross human rights violations and abuses such as widespread sexual violence;                                                                    |                                                                                                                                                                                                                                                                                                              | Low                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|      | 5) war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.                                        |                                                                                                                                                                                                                                                                                                              | Low                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 2    | Direct or indirect support to non-state armed groups                                                                                                     |                                                                                                                                                                                                                                                                                                              | Low                     | We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 3    | Direct or indirect support to public or private security forces who illegally control, tax or extort money from mine sites, transportation routes and S. |                                                                                                                                                                                                                                                                                                              | Low                     | We will immediately alert relevant central government authority (e.g. Ministry of Mines) of abusive and exploitative practices occurring in the supply chain;<br>In areas in which minerals are illegally taxed or extorted, we will take immediate steps to ensure that upstream intermediaries and consolidators disclose downstream or publicly                                                                                                                                                                                                                                                                                                                                                                                           |

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|  |  |  |  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|--|--|--|--|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  |  |  |  | <p>the payments made to public or private security forces for the provision of security. We will engage with intermediaries and consolidators to help build their capabilities to document the behavior of security and payments to security forces.</p> <p>While sourcing from areas of artisanal and small-scale mining (“ASM”), support the formalization of security arrangements between ASM communities, local government, and public or private security forces, in cooperation with civil society and international organisations, as appropriate, to ensure that all payments are freely made and proportionate to the service provided, clarify rules of engagement consistent with the Voluntary Principles on Security and Human Rights, the UN Code of Conduct for Law Enforcement Officials and the UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials;</p> <p>We will support the establishment of community forums to share and communicate information.</p> <p>We will support the establishment of a trust or other similar fund, where appropriate, through which security forces are paid for their services;</p> <p>We will build partnership with international organisations or civil society organisations, as appropriate, to support capacity-building of security forces</p> |
|--|--|--|--|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

|   |                                                                    |                                                                                       |     |                                                                                                                                                                                                                                                                                                                                                                                                         |
|---|--------------------------------------------------------------------|---------------------------------------------------------------------------------------|-----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   |                                                                    |                                                                                       |     | <p>consistent with the Voluntary Principles on Security and Human Rights, on mine sites, and UN Code of Conduct for Law Enforcement Officials or the UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials</p>                                                                                                                                                              |
| 4 | Bribery and fraudulent misrepresentation of the origin of minerals | Official notifications by DeBeers, Regulatory department notifications and circulars, | Low | <p>We will cooperate through associations, assessment teams or other suitable means to build capabilities of suppliers, in particular SMEs, to conduct due diligence for responsible supply chains of minerals from conflict-affected and high-risk areas. Immediately stop commercial relationship and inform to relevant financial Intelligence Unit of the region and relevant government bodies</p> |

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|   |                                                                            |                                                                                                                                                                                                                  |     |                                                                                                                                                                                                                                                                                                                                                   |
|---|----------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5 | Money laundering and non-payment of taxes and royalties due to governments | Data bank from World bank, UN security notifications, <a href="https://www.un.org/sc/ctc/news/keyword/aml/">https://www.un.org/sc/ctc/news/keyword/aml/</a> Supplier diamond sourcing questionnaire, KYC Checks. | Low | We will develop supplier, customer and transactional red flags to identify suspicious behavior and activities;<br>We will identify and verify the identity of all suppliers, business partners and customers;<br>We will report suspicious behavior of criminal activity to local, national, regional and international law enforcement agencies. |
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### Key Performance indicators for Human rights

| Sr#        | Objects (KPI's)                                                                                                                                                                  | Outcome                                                                                                                                                               | Results  |
|------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|
| 1          | <b>Investment and Procurement Practices</b>                                                                                                                                      |                                                                                                                                                                       | Low Risk |
|            | Any suppliers and contractors found violation human rights at workplace?                                                                                                         | No                                                                                                                                                                    |          |
|            | Employees are trained on aspects of human rights that are relevant to operations?                                                                                                | Yes, all employees are trained twice in a year on Human rights aspects.                                                                                               |          |
|            | Any Sourcing from Conflict affected and High-Risk Areas in Assessment year?                                                                                                      | No sourcing from CAHRA's                                                                                                                                              |          |
| 2          | <b>Non-Discrimination</b>                                                                                                                                                        |                                                                                                                                                                       | Low Risk |
|            | Total number of incidents of discrimination and actions taken.                                                                                                                   | No discrimination incidents in last one year                                                                                                                          |          |
| 3          | <b>Freedom of Association and Collective Bargaining</b>                                                                                                                          |                                                                                                                                                                       | Low Risk |
|            | Operations identified in which the right to exercise freedom of association and collective bargaining may be at significant risk, and actions taken to support these rights.     | The company has open door management principle for any individual                                                                                                     |          |
| 4          | <b>Child Labour</b>                                                                                                                                                              |                                                                                                                                                                       | Low Risk |
|            | Operations identified as having significant risk for incidents of child labor, and measures taken to contribute to the elimination of child labor.                               | The entity has not hired any child labour during assessment period and no indirect child labour abuse observed                                                        |          |
| 5          | <b>Forced and Compulsory Labor</b>                                                                                                                                               |                                                                                                                                                                       | Low Risk |
|            | Operations identified as having significant risk for incidents of forced or compulsory labor, and measures taken to contribute to the elimination of forced or compulsory labor. | No incident of any forced or compulsory or bonded labour observed during interaction with employees. No such incident reported in suggestion/complaint register.      |          |
| 6          | <b>Security Practices</b>                                                                                                                                                        |                                                                                                                                                                       | Low Risk |
|            | Percentage of security personnel trained in the organization's policies or procedures concerning aspects of human rights that are relevant to operations.                        | Security guards are used only for the protection of company assets and never used to suppress or bully any individuals. They are also trained on Human Right aspects. |          |
| 7          | <b>Indigenous Rights</b>                                                                                                                                                         |                                                                                                                                                                       | Low Risk |
|            | Total number of incidents of violations involving rights of indigenous people and actions taken.                                                                                 | No violation or threats incident observed during assessment period.                                                                                                   |          |
| Conclusion |                                                                                                                                                                                  | AMP reviewed and verified by the compliance head and management of the company found all Key Indicators are Low Risk.                                                 |          |

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## Internal Policy On Prevention of Sexual Harassment in The Workplace 2026-27

CORE JEWELLERY PVT. LTD., a company incorporated under the Companies Act, 1956 registered office at Unit GJ04 / IT12, SDF VII, SEEPZ SEZ, Andheri East, Mumbai-400 096

This policy is for all employees of CORE JEWELLERY PVT. LTD. This Protection of Women from Sexual Harassment Policy (POSH) aligns with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013; and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013.

In the event, any part of this policy is contrary to any law(s) in force, such part shall be deemed to be null and void. In the event this policy doesn't cover any legal compliance requirement on the subject, the same shall be deemed to be a part of this policy and the Organization shall be duty-bound to follow the same.

### INTRODUCTION

CORE JEWELLERY PVT. LTD is an equal employment opportunity company and is committed to providing a working culture based on respect and teamwork. The company's values dictate a workplace that is free from coercion, harassment and inequity. The company also believes that all its employees have the right to be treated with dignity. Sexual harassment is therefore unacceptable and regarded as misconduct as per this policy. In order to deal with sexual harassment at the workplace and as required under 'The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("the Act"), this policy provides for protection against sexual harassment at the workplace, for the prevention and redressal of complaints of sexual harassment and to enforce strong disciplinary action in the event of any such incident.

This policy document details the relevant terms and definitions relating to sexual harassment in the workplace; the complaint and redressal mechanisms; and relevant guidelines for all employees.

#### I. Policy Objectives

- The objective of the anti-sexual harassment policy is to foster a professional, open and trusting workplace.
- To provide an appropriate policy document in compliance with the Act as well as in line with global policies and practices, which can be implemented effectively, monitored and communicated effectively to all employees.
- To promote gender equality and a safe, discrimination-free work environment for all employees.
- To encourage employees to understand their responsibilities and take an active role in preventing harassment.

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- To provide a safe atmosphere for employees who can depend upon the organization's support in resolving their concerns on sexual harassment at work regardless of position or status.

## II. **Scope and effective date:**

- The rules for anti-sexual harassment detailed herein shall be applicable to all employees, trainees, probationers, contract workers, retainers of CORE JEWELLERY PVT. LTD.
- This policy is applicable to all, including full-time employees, workers, volunteers, probationers and trainees including those on deputation, part-time employees, contract workers, consultants or otherwise (whether in the office premises or outside while on assignment).
- The policy may be amended from time to time, based on changes in CORE JEWELLERY PVT. LTD internal policies, or changes to the Act, or its rules, or applicable law. As such, a hard copy of this Policy may not reflect the most recent status.

## III. **General guidelines:**

The Company's fundamental policy is that we will treat all the employees of CORE JEWELLERY PVT. LTD with dignity and respect. Any act constituting sexual harassment of any employee, trainee, contractor, vendor or customer is strictly prohibited.

### Definition

For this purpose, sexual harassment includes any form of unwelcome sexually determined behaviour (whether directly or by implication) as:

1. Physical contact and advances
2. A demand or request for sexual favors
3. Sexually colored remarks
4. Showing pornography
5. Any other unwelcome physical, verbal/non-verbal conduct.

The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment –

- i. Implied or explicit promise of preferential treatment in their employment; or
- ii. Implied or explicit threat of detrimental treatment in their employment; or
- iii. Implied or explicit threat about their present or future employment status; or
- iv. Interferes with their work or creating an intimidating or offensive or hostile work environment for them; or
- v. Humiliating treatment likely to affect their health or safety.

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**For a further explanation of what kinds of acts constitute sexual harassment, please read the FAQ's.**

- “Employee” means a person employed at a workplace for any work on regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor with or, without knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether terms of employment are expressed or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.
- “Internal Committee (IC)” means the committee constituted by CORE JEWELLERY PVT. LTD to investigate complaints of sexual harassment, in the manner prescribed under the law.
- “Respondent” means a person against whom a complaint of sexual harassment as set out in this policy has been made.
- “Workplace” includes any place visited by the Employee (as defined above) arising out of or during the course of the employment including transportation provided by for undertaking such journey.
- “Aggrieved woman” means, in relation to a workplace, a woman, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.

#### **Internal Complaints Committee (ICC):**

1. The Complaints Committee will comprise of minimum 4 members and will be headed by the designated Presiding Officer of the Complaints Committee who would have to be a woman working at a senior level position within the company.
2. The Presiding Officer would then appoint the balance members of whom not less than 50 percent have to be women.
3. At least two persons from among the employees who have the knowledge of law, social work or concern for women shall be nominated as members of the committee.
4. One member of the committee shall be an external non-governmental organizations or associations committed to the cause of women or a person familiar with the issues related to women. Such a member is entitled to be reimbursed daily allowance of Rs.200 per day and actual travelling expenses up to three tier AC and local conveyance to attend the meeting.
5. If the company has more than one branch or office the ICC shall be formed for all offices/branches.
6. If a senior level employed woman is not available for the post of PO in a particular workplace such a woman from another office/ branch of the company can be appointed.
7. The PO and members shall hold office up to three years from the date of nomination.

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8. PO or members of ICC may be removed from the post, if he/ she reveal the identity of aggrieved person, respondent, witnesses or discloses the content of enquiry; or convicted for any offence or any enquiry is pending; or found guilty of misconduct through disciplinary proceedings or has abused his/ her position. The ICC shall initiate procedure to take necessary action against such a member or PO.

#### **Redressal Procedure in case of Sexual Harassment:**

1. Complaint procedure
  - I. An aggrieved employee (an employee being sexually harassed by a co-employee/superior) can make a written complaint to ICC within three months from the date of incident of harassment describing therein the incident of sexual harassment.
  - II. If the aggrieved employee is not able to make a written complaint the PO shall render necessary assistance in making a written complaint.
  - III. If an aggrieved employee is unable to make a complaint due to ill health or death her legal heir may make the complaint.
2. Conciliation & Settlement
  - I. The committee at the request of aggrieved employee may settle the matter between her and the respondent through conciliation.
  - II. There shall not be any monetary compensation as a basis for conciliation.
  - III. If a settlement is arrived on account of conciliation the committee shall forward a copy of it to the management as the case may be for its implementation.
  - IV. The committee shall provide copy of the settlement to aggrieved employee and the respondent.
  - V. Further enquiry by the committee is not required if a settlement is arrived and implemented.
3. Enquiry into the complaint
  - I. Where the settlement is not initiated /arrived under as stated in the above clause of conciliation, the committee shall enquire into the complaint in the following manner.
  - II. Where the respondent is an employee the committee shall inquire into the complaint in accordance with the provisions of service rules.
  - III. If service rules do not exist, then as per the norms prescribed by the government by notification.
  - IV. Where the aggrieved employee informs the committee that any terms of settlement agreed under conciliation and settlement has not been fulfilled by the respondent. The committee shall give an
  - V. opportunity to the aggrieved employee and respondent to present their case, and a copy of enquiry report shall be given to them, to enable them make representation if any against the report of findings.

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- VI. When the respondent is convicted of the offence under this Act by the court of law, notwithstanding anything contained in section 509 of IPC, the court may order payment of monetary compensation by respondent to the aggrieved woman.
- VII. The committee shall have the powers of a civil court under code of civil procedure 1908, in conducting the enquiry

#### 4. Action after the completion of the enquiry

- I. On completion of the enquiry the committee shall submit the report of findings to the management within ten days and copies of the report shall be provided to the aggrieved employee and the respondent.
- II. Where the committee comes to the conclusion that the allegation of sexual harassment is not proved, it shall recommend to the management not to take any action against the respondent.
- III. Where the committee comes to the conclusion that allegation of sexual harassment is proved, it shall recommend to the management to take action against the respondent, as per the standing order or service rules applicable to the respondent.
- IV. Where the standing order or service rules are not made, action may be initiated as prescribed by the government. The committee shall recommend to the management to take any action against the respondent, including, a written apology, warning, reprimand or censure, withholding of promotion, withholding of pay rise or increments, terminating the respondent from service or undergoing a counselling session or carrying out community service.
- V. The committee may direct for the payment of monetary compensation to aggrieved employee or her legal heirs, by deducting from the salary of the respondent. In determining the amount of compensation. Further enquiry by the committee is not required if a settlement is arrived and implemented.
- VI. The committee shall have regard to the pain or distress suffered by the aggrieved person, the loss in the career opportunity, the money spent for availing medical treatment, the financial status of the respondent, and the feasibility of such payment in lump sum or in instalment.
- VII. If the management is not able to deduct from the salary of the respondent due to absence from duty or cessation of employment, the committee may direct the respondent to pay the compensation to the aggrieved person or to the legal heirs.
- VIII. In case the respondent fails to pay the compensation determined by the committee, it shall send a recovery order to the District Officer of the Local Complaints Committee (LCC), to collect the amount as land revenue from the respondent and pay to the aggrieved employee.
- IX. The management shall take action on the report of findings of the committee within sixty days from the date of its receipt.

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- Appeal against the action taken: Any employee, who is aggrieved by the implementation of recommendation of the committee or by the non implementation of it, may prefer an appeal as per the service rules/ standing order, or as per the procedure prescribed by the government; within ninety days from the date of recommendation.
- False Complaints: When the committee comes to the conclusion that any person has given false complaint, or produced false evidence in the enquiry, it may recommend to the management., that action should be initiated as per standing order/ service rules against such person, or action as per the procedure prescribed by the government.
- Confidentiality of the employees involved and enquiry: The contents of proceedings under this Policy and the action taken should not be revealed to public, press or any mass media. Whoever reveals such information shall be punished as per the service rules or as per the procedure prescribed by the government
- RETALIATION: This policy recognizes retribution or retaliation in the context of reporting acts of sexual harassment as a serious violation. The report and investigation of allegations of retaliation will follow the procedures set forth in this Policy and will be treated as an additional complaint and investigated similarly. Any person found to have retaliated against an individual for reporting harassment, or for participating in an investigation of allegations of such conduct, may expect the Company to impose severe disciplinary action.
- **Miscellaneous:** No employee, making a genuine complain, shall be victimized. Witnesses, if any, shall also not be victimized for giving evidence.

### Complaint Mechanism

#### How to file a complaint?

1. All the complaints under this Policy shall be made in writing to the IC within 3 (*three*) months from the date of the incident and in case of a series of incidents, within 3 months from the date of the last incident. (The IC can extend the period for a further period of 3 (*three*) months in special circumstances by recording the reasons for the same.)
2. Complaints can be sent by email, phone call, registered post, or handed over in person to any IC member.
3. The complaint shall be submitted along with supporting documents, if any and the names and addresses of the witnesses, if any. Annexure 5 contains a sample draft.
4. If for any reason, the complainant cannot make the complaint in writing, the IC members shall render all reasonable assistance to the complainant to draft the complaint.
5. Any person who knows about the incident may also file a complaint with the consent of the complainant.
6. If the complainant is unable to make the complaint due to any physical or mental incapacity or death or otherwise, the legal heir or any of the following may make the complaint on their behalf: A relative or

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friend of the complainant; or A special educator; or A qualified psychiatrist or psychologist; or The guardian or authority under whose care, the complainant is receiving treatment if any; or Any person who knows about the incident together with any one of the above-mentioned people or with the consent of the legal heir in case the complainant is dead.

### **Inquiry**

1. Within 3 working days of receiving a complaint, the IC shall meet to determine whether the case falls in the realm of the policy.
2. A Complaint Register (soft copy) bearing the date of opening of such cases shall be maintained by the IC. All complaints received shall be numbered and entered in the Complaint Register with date of receipt of the Complaint. Annexure 7.
3. Complaints sent by registered post shall bear the correct name and address of the complainant and respondents and witnesses thereof.
4. Within 5 working days, the IC shall intimate the date, time and place of the hearing of the complaint to the Complainant.
5. Within 7 working days of receipt of the complaint, the IC shall send the details of the complaint along with the date, time and place of the hearing to the Respondent.
6. In case of conciliation, the terms shall be informed to the Respondent.
7. In case of inquiry, the Respondent shall file his reply to the complaint within 10 working days from the date of receipt of the complaint along with the list of supporting documents and names and addresses of the witnesses, if any.
8. The IC shall permit either party to include, introduce and add new documents as evidence even during the oral hearing.
9. The IC shall provide a reasonable opportunity to the Complainant and the Respondent to present and defend their case.
10. The IC shall have the right to summon as many times the Complainant, or the Respondent against whom the complaint is made, or any other witnesses for the purpose of supplementary testimony or any clarification.
11. The parties shall not be allowed to bring any legal practitioner to represent them in their case at any stage of the proceedings before the IC.
12. The IC must complete its investigation within a period of 90 days.

### **Powers Of The Committee**

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1. The IC shall have the same powers vested in a civil court under the Code of Civil Procedure, 1908 including but not limited to summoning and enforcing attendance of any person, requesting the discovery and production of documents.
2. The IC shall act in accordance with the principles of natural justice and ensure all parties are treated with dignity and respect and are given an opportunity to be heard and ensure the inquiry is conducted in a fair and impartial manner.
3. The IC can either terminate the inquiry proceedings or pass an ex parte order if either the complainant and/or the respondent fails to present themselves during the proceedings without sufficient cause for 3 consecutive hearings.
4. The IC can suo-motto take cognisance if they are aware of the alleged Sexual Harassment.

## RESPONSIBILITIES

### Employee responsibilities

- CORE JEWELLERY PVT. LTD. expects all its employees to comply with its policy and code of conduct towards creating a respectful and dignified work-environment for all. Employees must:
- Familiarize themselves completely with this policy and its contents.
- Co-operate with any measures introduced to promote equal opportunities.
- Make sure they understand and respect the sensitivities of co-workers and other people in the workplace.
- Refrain from discriminatory, offensive or disrespectful behavior, or any behavior which is in contradiction to the letter or the spirit of this policy.
- Make sure they extend support to any person who they suspect is being harassed in addition to reporting any such instance of sexual harassment to the appropriate person/s.
- Maintain confidentiality regarding any aspect of a complaint or an inquiry of which they may have information or may be included.
- Personal relationships – Employees are required to formally inform HR and their direct supervisors if they are involved in a personal relationship of a romantic nature with a co-worker.

### Manager responsibilities

As representatives of the Employer, CORE JEWELLERY PVT. LTD managers are expected to present exemplary behavior, as well as play a strong supporting and guiding role for team members and others in adhering to this policy. Managers must

- Provide a safe place for their employees and team members and foster a
- discrimination-free environment.
- Communicate and provide support in understanding this policy.

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- Handle any complaint that they receive with tact and maturity and take prompt action and communicate such issues to the appropriate person/s.
- Refrain from playing favourites, colluding, campaigning, gossiping or attempting to induce or pressure or otherwise interfere with such complaints or employees to influence an outcome.

- **ADDENDUM**

- **FAQs**

- 1) What is considered sexual harassment?

Sexual harassment can include (but is not limited to) any one or more of the following unwelcome acts or behavior(whether directly or by implication), such as -

- An unwelcome act of inappropriate physical intimacy, like grabbing, brushing, touching etc.
- An unwelcome remark with sexual connotations, like sexually explicit comments or compliments / jokes with sexual connotations/ making sexist remarks etc.
- Sharing of any sexually explicit visual material, in the form of pictures / cartoons / screen savers on computers /any offensive written material or sms's /WhatsApp messages / pornographic e-mails, etc.
- Engaging in any other unwelcome conduct of a sexual nature, which could be verbal, or even non-verbal, like staring to make the other person uncomfortable, making offensive gestures, kissing sounds, etc.
- Making an unwelcome demand or request (whether directly or by implication) for sexual favours from another person
- A superior requesting or implying a request for sexual favours from a junior in return for advancement or benefits or negative threats whether direct or implied.
- A person in power making intrusive inquiries or references about the private lives of employees, or persistently asking them out
- A group of workers joking about sexual conduct (even amongst themselves) in an attempt to humiliate or embarrass another person
- Acts or conduct by a person in authority that renders the environment at workplace hostile or intimidating to a person belonging to the other sex

Please remember that in cases of sexual harassment, the intent of the perpetrator is irrelevant; and it is the

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impact on the aggrieved person that is considered pertinent.

1. What should I do if I think I am being sexually harassed?

Please let an IC member know right away. Unfortunately, ignoring sexual harassment does not make it go away. Please read the policy on workplace sexual harassment and make a written complaint of the behaviour.

2. Can I make an anonymous complaint?

No. CORE JEWELLERY PVT. LTD will not be able to investigate complaints anonymously, as the identities of both the victim and the alleged perpetrator, as well as any witnesses, are critical to a fair and impartial enquiry. Please bear in mind that CORE JEWELLERY PVT. LTD will protect the confidentiality of all parties involved as prescribed under the law, and will also treat retaliation as a serious offence. So make your complaints officially and without any fear.

3. I'm being harassed by someone who is not an employee, but who visits CORE JEWELLERY PVT. LTD. to conduct business. Is there anything I can do?

Yes, you can report the issue as Sexual Harassment. The policy applies to the extended workplace, as well as situations involving an external stakeholder.

4. Will my complaint be treated confidentially?

CORE JEWELLERY PVT. LTD will make every practicable effort to handle inquiries, complaints and related proceedings in a manner that protects the privacy of all parties.

Each situation is resolved as discreetly as possible, with information

shared only with those who need to know in order to investigate and resolve the matter. The organization will be sensitive to the feelings and situation of the alleged victim and anyone who reports sexual harassment. However, the organization will need to address the issue and try and get as much information as possible while keeping the information confidential. All employees are also constrained to follow confidentiality to the

maximum possible extent.

5. How will a false allegation of sexual harassment be handled?

When someone intentionally reports information or incidents that they know to be untrue, or lies to make a claim, or makes a malicious complaint, or provides false or forged documents during a complaint or an inquiry; it is considered a fraudulent claim. Strict Disciplinary action may be imposed on individuals who make false allegations of sexual harassment upon enquiry of the same. Failure to prove a claim of harassment is not equivalent to a false allegation.

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6. What if a visitor to the office, a woman, feels / is sexually harassed by an employee?

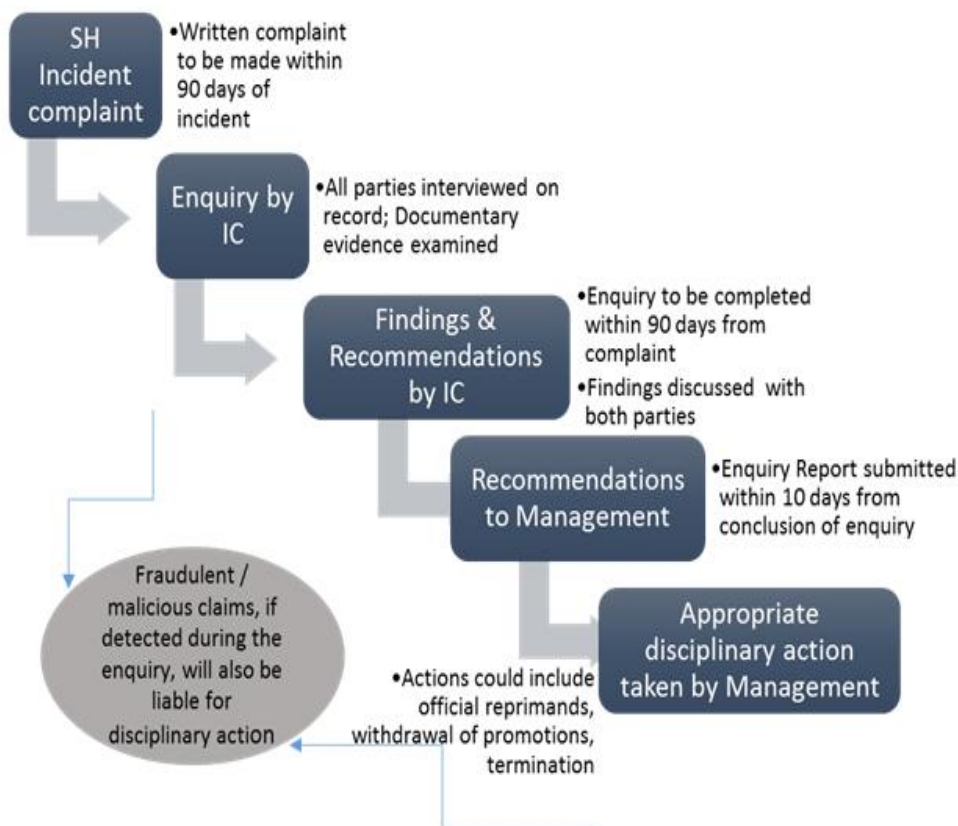
Protection under this Act applies to all women in workplaces. Therefore, even a visitor or customer to the office is covered under the law. If you are told of any such incident or complaint, please report the matter to a member of the IC or HR immediately.

7. What else can I do?

- Feel empowered to set your own boundaries. Say "NO" emphatically and clearly when you are asked to do things, go places, respond to questions, or engage in situations that make you uncomfortable. Do not worry about offending the other person or damaging relationships. Take care of yourself first and ensure you communicate directly and clearly if you are uncomfortable with any inappropriate behavior.
- Be aware of situations and people around you. Don't ignore other's warnings about particular people or locations or social settings.
- Trust your own instincts about possible danger. In an uncomfortable situation remove yourself from the situation immediately. Regardless of your previous behavior or signals, you have the absolute right to halt any inappropriate or unwelcome exchange at any time.

8. THE REDRESSAL PROCESS – EXPLAINED.

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## IC MEMBER GUIDELINES

All IC members must consider the prevention of sexual harassment in the workplace as their responsibility and obligation; and must proactively initiate measures to achieve the same, including communicating to employees, and sensitizing and educating them through periodic trainings. In addition, they must

- Familiarize themselves with the details of the Act, and its rules; and any other amendments or notifications that may be made.
- meet regularly to update themselves on and review the details of any complaints that may have been made, and inquiries conducted
- Be responsible for submitting an annual report on all complaints of this nature to both the Management as well the District Officer, in the manner prescribed.
- keep in mind the covert and insidious nature of sexual harassment, and stay sensitive to the practical and societal difficulties in reporting such acts
- be sensitive to the difficulties in providing direct or corroborative evidence of such incidents

Further, while conducting an investigation, IC members shall follow their own code of conduct:

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1. Shall be cognizant of the implicit and explicit power equations between all parties, including organizational hierarchy and influence as well as the relative socio-economic differences, while evaluating testimonies and evidence.
2. Shall not conduct any enquiry or allow any evidence about the complainant's personality, character, personal life, general behavior or personal and sexual history.
3. Shall guard against any bias in their own perception or investigation.
4. Shall keep both parties reasonably informed at their discretion about the status of the complaint and enquiry.
5. Shall stay impartial to both parties, and follow the principles of natural justice in its enquiries
6. Shall evaluate all testimonies and evidence applying a balance of probabilities.

**EMPLOYER GUIDELINES:** CORE JEWELLERY PVT. LTD. is committed to providing a safe and respectful working environment and a harassment-free atmosphere. By means of this policy and other measures, it shall:

1. Ensure the communication of this policy, and any other relevant information, to all its employees.
2. Organize workshops and training programs at regular intervals for sensitizing the employees regarding the provisions of the policy.
3. Provide necessary facilities to the IC for dealing with complaints and conducting inquiries.
4. Assist in securing the attendance of respondent and witnesses before the ICC and make available any information the IC may require in conducting its enquiry.
5. Provide assistance to the aggrieved person if they choose to file a complaint in relation to the offence under the Indian Penal Code
6. Where sexual harassment occurs as a result of an act or omission by any third party or outsider, CORE JEWELLERY PVT. LTD. shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
7. In case the degree of offence is deemed coverable under the Indian Penal Code, then appropriate action shall be initiated by the Management, for making a Police Complaint.
8. Encourage all its vendors and other relationships to be compliant with the Act, and communicate CORE JEWELLERY PVT. LTD 's commitment to a harassment-free workplace both officially and informally to all its vendors.
9. To take such actions based on the findings and recommendations of the Internal Committee (IC) as per the Act.
10. Proffer protection against retaliation to complainants, witnesses, committee members and other employees involved in prevention and complaint resolution.

#### Interim Reliefs to The Complainant

1. During the pendency of the proceedings and upon the receipt of a written request from the complainant and/or if the IC deems fit, the IC can recommend to the Management by way of an interim order, interim relief keeping in mind the nature and gravity of the misdemeanour. Annexure B.

#### Inquiry Report and Action

1. Upon completion of inquiry proceedings, the IC within a period of 10 working days shall provide its decision i.e. guilty or not guilty.
2. If it is found that the Respondent is guilty then the IC shall make recommendations to the Management for further action against the Respondent. Annexure B.

#### Malicious Complaints

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1. Upon the completion of a detailed inquiry, if the IC concludes that the complainant and/or witness has malicious intent or knows it to be false or that the documents presented were either false or misleading, the IC shall take action against the complainant. Annexure B.
2. The malicious intent on the part of the complainant and/or witness shall be established only after an independent inquiry is conducted.
3. Provided, however, mere inability to substantiate the complaint or provide adequate proof shall not attract any action against the complainant and/or witness.

#### **Appeal**

1. Any party who is aggrieved by the order passed by the IC can file an appeal before the Industrial tribunal/Labour Officer (district level) within a period of 90 days of the passing of the order

#### **Confidentiality**

1. All the complaints received under this Policy shall be kept in strictest confidence by the IC members and the Management.
2. Details of the complainant, names of witnesses or any documents shall not be disclosed to any other person in the Organisation, any third party, the general public, the press or the media.
3. If the complainant so desires, then the identity of the complainant shall be kept secret at all times.
4. No detrimental action shall be taken against any witness to the proceedings unless it is proven upon due inquiry that such witness had given false statements with either malicious intent or knowing it to be false.
5. No person who is aware of a complaint and inquiry proceedings, whether a party or not, shall disclose the details of the complaint to any other person in the Organisation, any third party, the general public, the press or the media.
6. Any person who is found guilty of violating these provisions related to confidentiality may be terminated by the Organisation with immediate effect without any compensation whatsoever.
7. Information may be disseminated regarding justice to aggrieved persons under this Policy without disclosing the name, address, identity, or any other particulars leading to the identification of the persons involved.

#### **Review and Updates:**

This policy will be reviewed periodically to ensure compliance with legal requirements and best practices. Changes will be communicated to all employees.

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### Land Rights Policy

CORE JEWELLERY PRIVATE LIMITED, is committed to doing business in ethically way and has a zero tolerance for illegal activities and land displacements of any legitimate land tenure holders for the purpose of acquiring land for the business of the company.

Specifically, we will be committed to:

1. Zero tolerance for land displacements of any peoples;
2. Fair and legal negotiations for land acquisitions' and
3. Use of appropriate grievance mechanisms for future dispute resolutions.

The Company will:

1. Adhere to legal requirements for acquiring land of each country in which we operate.
2. When the company is acquiring land, engage in fair and legal negotiations on land transfers and acquisitions. The company will follow and implement the Free, Prior, and Informed Consent (FPIC), principals, which can be summarized as:
3. Free – consent to the sale of land is given voluntarily and absence of “coercion, intimidation or manipulation”
4. Prior – consent is sought sufficiently in advance of any authorization or commencement of activities from existing land owner.
5. Informed – Ensures that necessary information is provided to the land right holder(s) prior to seeking consent to acquire the land.
6. Consent – Refers to the collective decision made by the land rights-holder (s) and reached through the customary decision- making processes of the affected peoples or communities.

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### CORE JEWELLERY PRIVATE LIMITED CONFLICT MINERAL POLICY

CORE JEWELLERY PRIVATE LIMITED, is fully committed to the responsible sourcing of our products and the respect of human rights, and we expect the same from our suppliers around the world. We continually strive to assure our customers, employees, investors, and other stakeholders that our supply chain avoids action that may directly or indirectly finance armed conflict and serious human rights violations around the world including the Democratic Republic of Congo and its adjoining countries.

CORE JEWELLERY PVT. LTD. has been at the forefront of responsible sourcing in the diamond and Jewellery supply chain and is a certified member of the Responsible Jewellery Council (RJC), an organization that is committed to prompting responsible ethical, human rights, social and environmental practices throughout the Jewellery supply chain. As an active participant, we fully support the RJC's membership Code of Practices and Chain of custody standards.

CORE JEWELLERY PVT. LTD has also been active in cross-sector coalitions and working groups to ensure that companies respect human rights and avoid contributing to armed conflict. CORE JEWELLERY PVT. LTD. supports the Organization for Economic Cooperation and Development (OECD) due diligence guidelines supplement for gold, the London Bullion Market Association (LBMA) Responsible Gold Guidance, and the Dodd Frank Wall Street Reform and Consumer Protection Act, Section 150, relating to our supplies of gold.

To comply with the conflict-free sourcing requirements:

CORE JEWELLERY PVT. LTD. requires and audits statements from our vendors that gold they are providing is obtained from verifiable sources that can be audited and traced back to LBMA. The review and substantiation of these claims will take place from time to time as CORE JEWELLERY PVT. LTD. renews its certification with RJC along with the provenance Bolt on for conflict free metals.

1. CORE JEWELLERY PVT. LTD. does not deal in Tantalum, Tungsten or TIN.
2. CORE JEWELLERY PVT. LTD. requires its vendors provide a statement verifying same as above and to maintain accurate towards that can be audited upon request. If a seller supplies, will supply or expects to supply any good to CORE JEWELLERY PVT. LTD. that contain any amount of metal (i.e. silver, steel, platinum, gold, tin, tantalum, tungsten, etc.) Seller will include the warranty statement on all invoices and supporting documentation such as delivery notes.
3. If seller deliver goods without the proper warranty statement documentation, the product will either be held until the proper documentation is obtained, or be returned to Seller at Seller's sole cost and expense, such determination to be made by CORE JEWELLERY PVT. LTD. The warranty statement will similar to :

The Seller warrants that any product containing gold, tin, tungsten or tantalum have been supplied in compliance with the accepting sourcing protocols as governed by the RJC and compliant with Dodd-Frank regulations.

Date : 10.04.2026

Place: Mumbai

*Bhavesh Meghani*

Bhavesh Meghani  
Head Admin

