

**Supply Chain Policy
& Supplier Code of Conduct**



(Effective From: 01st April 2025)

1. Purpose

This policy and code of conduct (CoC) establishes the fundamental standards of responsible business conduct that we expect all suppliers, contractors, service providers, and business partners to adhere to when conducting business with the company. We believe that our vendors and suppliers are not just external entities but valued partners and an integral part of our business ecosystem. The success of our operations and our ability to meet global standards of quality, ethics, and compliance is closely tied to the commitment and integrity of our supply chain partners. We recognize that effective and sustainable compliance can only be achieved when we work hand in hand. By aligning our practices and values, and ensuring mutual adherence to these standards, we can collectively drive responsible business conduct and long-term success.

This ensures that all suppliers align with our commitment to human rights, fair labour practices, environmental responsibility, business ethics, and regulatory compliance and have a similar approach to responsible business.

2. Scope

This Supply Chain Policy and Supplier Code of Conduct applies to:

- All operations of Fine Jewellery Manufacturing Limited, Fine Euro BV & FJIL Inc [collectively mentioned hereafter as the 'Companies']
- All suppliers, subcontractors, service providers, vendors, and third-party agents engaged in business with the companies in any capacity.
- **Suppliers of the companies' suppliers**
- All business activities, operations, and transactions conducted in relation to the companies, including sourcing, manufacturing, packaging, logistics, and distribution.

Suppliers are expected to implement and monitor compliance mechanisms to ensure full adherence to this Policy/ CoC throughout their business operations.

3. Commitments & Expectations from Suppliers

The companies are certified members of the Responsible Jewellery Council (RJC) and the Companies abide by all expectations of RJC Code of Practice Standard (COP) and OECD's due diligence guidance. "Responsibly sourced" means that suppliers will avoid contributing to human rights abuses and/or conflict through their sourcing practices. We also commit to using our influence to prevent abuses by others. Failure to comply with our Code of Conduct may result in the termination of any agreement as a last resort.

3.1 Regarding serious abuses associated with the extraction, transport or trade of metals / minerals:

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

- a) Torture, cruel, inhuman and degrading treatment.
- b) Forced or compulsory labour, including all forms of modern slavery such as human trafficking, servitude and debt bondage. The worst forms of child labour.
- c) Human rights violations and abuses; or

- d) War crimes, violations of international humanitarian law, crimes against humanity or genocide.

3.2 Regarding labour rights

We are committed to upholding the dignity and respect of all individuals within our workforce and value chain. We maintain a zero-tolerance stance toward any form of modern slavery in any part of our supply chain nor any form of labour rights violations, including but not limited to child labour, forced labour, human trafficking, discrimination, and harassment. We ensure the provision of fair wages and reasonable working hours, and we respect our employees' rights to freedom of association without fear of discrimination, retaliation, or sanction. We expect all suppliers and business partners to comply fully with applicable labour laws & standards applicable to their businesses.

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

We only buy or sell

- i) Gold, platinum and other precious metals fully compliant with a defined standard for conflict-free sourcing (including, but not limited to, Responsible Minerals Initiative conformance, RJC Code-of-Practices certification, OECD Due Diligence for Responsible Supply Chains, World Gold Council Conflict-free Standard)
- ii) diamonds that are fully compliant with the Kimberley Process Certification Scheme (KPCS)

and, as such, will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring precious metals & diamonds from, making payments to, or otherwise helping or equipping nonstate armed groups or their affiliates who illegally:

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

We expect our suppliers and business partners to carry out procurement in a responsible and conflict free manner from known sources not subjected to legal sanctions across the globe.

All suppliers are expected to have their goods produced, transited or sold from locations not in the EU CAHRA list, and if otherwise, provide relevant documentation on conflict-free sourcing (e.g. World Diamond Council System of Warranties document, KPCS Certification, OECD/ RJC Third-Party Due-Diligence).

All suppliers are required not to supply any precious or semi-precious metals or stones that originate from sanctioned Russian sources. To this effect, all suppliers of diamonds and precious metals to include with each supply a declaration to the effect that "No diamonds or precious metals of Russian origin purchased after February 24, 2022, are present in our supplies". This declaration should continue till modification or discontinuance of the same is communicated by us.

3.4 Regarding public or private security forces:

We affirm that the role of public or private security forces is to provide security to workers, facilities, equipment and property in accordance with the rule of law, including law that guarantees human rights. We encourage our suppliers to follow these or similar best practices.

3.5 Regarding bribery and fraudulent misrepresentation of the origin of metals / minerals:

We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of metals / minerals, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of metals / minerals. We expect our suppliers and businesses partners to abide by all facilitation payment regulations applicable to their domiciles & businesses. We also expect suppliers who are involved in mining & extraction comply with the Extractive Industries Transparency Initiative (EITI) standard and report on payments if any.

We expect suppliers to uphold fair-market principles and avoid any form of collusion or anti-competitive practices. Practices such as coordinated pricing or bid-rigging undermine ethical business conduct and will not be tolerated.

We expect suppliers to engage respectfully and ethically, without using threats, pressure, or intimidation to obtain business advantage. Coercive conduct is incompatible with responsible and sustainable business practices.

Suppliers must avoid situations where personal interests interfere with their work or decisions. Any conflict of interest must be shared with us right away. We are legally obligated to provide clear, accurate, and verifiable information concerning the methods and resources utilized, the locations of production, and the characteristics of the products or services supplied (including materials such as lab-grown, treated and simulant diamonds). Our suppliers must not make any false or misleading claims, whether by omission or misrepresentation, and accept full responsibility for the accuracy of all disclosures made.

To evidence compliance to the above, our suppliers must maintain at the minimum, proper transaction documents (sale and purchase documents), documented KYC due diligence system and standard terms of business with all suppliers. Suppliers should also disclose all treatments conducted on their sold goods.

All suppliers of natural diamonds must include the warranty statements relating to the World Diamond Council (WDC) System of Warranties in all invoices and delivery notes. All suppliers of laboratory grown diamond are required not to include any natural diamonds or any material which is not laboratory grown diamond. All suppliers of Natural Color Gemstones must ensure that they are natural and segregated from Lab Grown Gemstones (LGG's).

3.6 Regarding money laundering:

We will support and contribute to efforts to eliminate money laundering where we identify a reasonable risk resulting from, or connected to, the extraction, trade, handling, transport or export of metals / minerals.

3.7 Regarding environmental stewardship

We are committed to building a sustainable future, with a strong focus on reducing environmental footprint and promoting social responsibility. We abide by applicable local and international environmental laws, regulations, & best professional standards, and have obtained all requisite environmental permits. We expect its suppliers & business partners to comply with all regulatory requirements applicable to their businesses & domiciles. We also encourage our suppliers to demonstrate environmental stewardship by actively working to reduce material & energy consumption, greenhouse gas (GHG) & non-GHG emissions, water usage, and waste generation, while also taking measures to minimize natural resource consumption and biodiversity loss.

We commit to establishing and maintaining appropriate measures for the safe handling, storage, & disposal of chemicals and waste, in compliance with applicable environmental, health, and safety regulations.

We encourage all our business partners to reduce the usage of precious natural resources such as water and power, and to minimize the generation of waste and single-use plastics in their operations and in the supplies delivered to us. We are open to suggestions and welcome opportunities for collaborative initiatives on this subject.

3.8 Regarding community and employee well-being

We are committed to have a positive impact on our employees, partners, neighbouring communities and other stakeholders in the regions in which it operates. We also commit to maintaining best health and safety practices within our own operations and in the areas where communities can be impacted.

We are open to evaluating and working on opportunities for community well-being, with our supply chain partners

3.9 Regarding Data and Intellectual Property

We are committed to complying with all applicable data security & protection regulations and any other equivalent national regulations in the markets we operate in. We ensure data protection by implementing adequate technical and security measures to prevent any form of data loss, theft, damage, unauthorised modification or access, or attack. We expect our suppliers to abide by the same and ensure equivalent measures as indicated above. We require our suppliers and business partners to respect and safeguard our Intellectual Property Rights and Rights to Use, and to implement appropriate controls to prevent any unauthorized access, use, or disclosure.

Supplier to inform us if there are any on going litigations or litigations in future regarding the goods or services being supplied by them or any Environment, Social or Governance aspects of their business.

3.10 Subcontracting

We expect our suppliers not to subcontract any of their obligations to us without prior written authorization. In instances where subcontracting is approved, the subcontractors shall be subject to this Policy and are expected to fully adhere to the standards and requirements set forth herein.

4. Compliance with the Policy & Code of Conduct

We expect our suppliers to abide by our Supply Chain Policy & Supplier CoC or/and have an equivalent Supply Chain Policy/ Supplier CoC for their own operations & suppliers. We believe that above expectations are the basic and bare minimum responsible sourcing and compliance

requirements which any responsible business should follow. Therefore, we expect all our suppliers to comply with the same and let us know in the situation of any exception. This includes considering commitments, defining policies & procedures for responsible business in all above aspects, providing support to their workforce & communities, abiding by all regulations applicable to their operations, and participating in capacity building activities whenever expected.

Suppliers shall provide full cooperation and support for any third-party audits, certifications, or compliance reviews by organizations including, but not limited to, the Responsible Jewellery Council (RJC), industry certification bodies, or regulatory authorities.

In case of non-conformity with this Policy & CoC by any stakeholder defined in the Scope, we reserve the right to require corrective action for violations, suspend purchases, refuse to take delivery under any purchase order, and return any goods or services until non-conformities have been corrected. We expect all business partners and suppliers to undertake appropriate corrective actions in the event of any policy violations, as a condition for future engagement. We will offer support in implementation of such actions to the extent reasonably possible, subject to available resources and capacity. We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are

- a) committing abuses described in section 3.1 or are sourcing from, or linked to, any party committing these abuses
- b) sourcing from, or are linked to, any party providing direct or indirect support to nonstate armed groups as described above.

We will also not provide any direct or indirect support to public or private security forces that commit abuses described in section 3.1 or that act illegally as described in section 3.2.

Interested parties, including affected stakeholders and whistleblowers can raise concerns about the business, organizations, individuals or activities in its supply chains. Management will extend full support to employees / associates who report and themselves does not participate in bribery, human right violation or any unethical practices. In case of any queries on the above you can contact us at:

Grievance Reporting Person: Mr. Jignesh Hemani Email - ID: compliance@fine-jewellery.com

This Policy will be subject to review by the Senior Management and revision, as and when necessary.

Thanking you,

Acknowledgement

We hereby acknowledge the receipt of this Supply Chain Policy & Supplier CoC. We confirm understanding of and commitment to abide by the same to the extent applicable to our operations and business.

Please sign below to acknowledge your understanding of, and commitment to, this Supply Chain Policy and Code of Conduct

Name of Supplier: _____

Name of Authorised Representative: _____

Signature of Authorised Representative: _____

Date: _____