

Policy Statement of Child Labour

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

Policy Statement of Forced Labour

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

- a. The management of *ANKIT GEMS 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. *ANKIT GEMS 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.
- b. The following definitions will be applicable:
 - The Universal Declaration of Human Rights that states that *'No one shall be held in slavery or servitude'*

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

Policy Statement Kimberley Process/ WDC Warranties

The policies relating to this section are part of the Business Policies adopted by Ankit Gems Pvt. Ltd. are presented below for reference:

- a. Ankit Gems 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.
- b. The definition of 'Conflict Gem Stone Diamonds' as agreed by the Kimberley Process will be adopted i.e.
"Rough diamonds used by rebel movements or their allies to finance conflict aimed at undermining legitimate Governments, as described in relevant United Nations Security Council (UNSC) resolutions in so far as they remain in effect, or in other similar UNSC resolutions which may be adopted in the future, and as understood and recognized in United Nations General Assembly (UNGA) Resolution 55/56, or in other similar UNGA resolutions which may be adopted in the future."
- c. Wherever applicable, the following affirmative statement as recommended by the World Diamond Council's System of Warranties should be printed on all the invoices:
"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. The diamonds herein invoiced are exclusively of natural origin and untreated based on personal knowledge and/or written guarantees provided by the supplier of these diamonds"
- d. 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.
- e. Ankit Gems 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.

Policy Statement General Employment, Working hours, Remuneration

- f. *ANKIT GEMS PVT LTD.* complies with applicable national laws / regulations with respect to employment.
- g. *Ankit Gems 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.
- h. *ANKIT GEMS 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.
- i. *ANKIT GEMS 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.
- j. 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.
- k. *ANKIT GEMS 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.
- l. 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.
- m. *ANKIT GEMS PVT LTD.* is committed to addressing the legitimate grievances of its employees.
- n. *ANKIT GEMS 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.
- o. Information regarding applicable employment policies and working practices shall be communicated in a transparent manner to all employees.
- p. *ANKIT GEMS PVT LTD.* is fully committed to the pursuance of the provision of fair and conducive employment conditions, consistent with applicable laws and regulations.

Policy Statement Money Laundering and Finance of terrorism

The policies relating to this section are part of the Business Policies adopted by ANKIT GEMS PVT LTD. is presented below for reference:

- a. ANKIT GEMS 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.
- b. Strict compliance is required at all times, with all applicable national and, where appropriate, international laws / regulations with respect to money laundering, terrorism financing, bribery, corruption, smuggling, embezzlement, fraud, racketeering, transfer pricing and tax evasion.
- c. ANKIT GEMS 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.
- d. ANKIT GEMS 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.
- e. ANKIT GEMS 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.

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 *Ankit Gems Pvt Ltd.* and are presented below for reference:

- a. *Ankit Gems Pvt Ltd.* will not prevent employees from associating and collective bargaining
- b. Discrimination can mean distinction, exclusion or preference.
- c. Any form of discrimination relating to the hiring, discharge, pay, promotion and training of employees on the basis of race, ethnicity, caste, national origin, religion, age, disability, gender, marital status, physical appearance, sexual orientation, HIV status, Migrant status, membership of worker representative bodies, political affiliations, or any criteria that are unlawful is strongly discouraged by *Ankit Gems Pvt Ltd.* and any such reported incidents will be viewed as a serious violation of this Business Policies.
- d. *Ankit Gems 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.
- e. Individuals who are “Fit for Work” shall be accorded equal opportunities and shall not be discriminated against on the basis of factors unrelated to their ability to perform their job.
- f. *Ankit Gems 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.
- g. *Ankit Gems 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. *Ankit Gems 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 individuals, assuming they have not been involved in the violation, will not be tolerated.

Policy Statement of Product Integrity

- a. *Ankit Gems Pvt Ltd.* is committed to complying with relevant trading standard legislation and specific national and local regulations applicable to its products.
- b. The following essential Policies will be applicable in all transactions of *Ankit Gems Pvt Ltd.* involving diamonds, treated diamonds, synthetics and simulant
 - **Disclosure** - *Ankit Gems 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.

c. *Ankit Gems 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 in the definition of the words 'diamond' and 'synthetic' above, but has been subject to some form of treatment i.e. any process, enhancement changing, interfering with and/or contaminating the natural appearance or composition of a diamond other than historically accepted practices of cutting and polishing. This includes colour and decolourisation treatment, fracture filling, laser and irradiation treatment and coating.

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



Policy Statement Product Security

- a. Ankit Gems 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.
- b. The security and well being of employees, visitors and other relevant business partners is prioritized when establishing product security measures.

Disclosure of Treated Diamonds, Synthetics and Stimulants

Policy Statement

The policies relating to this section are part of the Business Principles adopted by Ankit Gems 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."

" **Ankit Gems 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, 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.

Policy Statement Bribery and Facilitation Payments

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

- a. ANKIT GEMS 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.
- b. ANKIT GEMS PVT LTD. considers Bribery Risk as it applies to its organization (including agents) to identify which areas pose high risks. ANKIT GEMS PVT LTD. has developed appropriate methods to monitor conduct of employees and agents and eliminate bribery based on this understanding.
- c. The management of ANKIT GEMS 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.
- d. ANKIT GEMS 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 *Ankit Gems Pvt Ltd.* and are presented below for reference:
- Ankit Gems Pvt Ltd. is committed to the development of communities where it operates, contributing to their social and economic welfare.

Policy Statement Environmental protection, Hazardous substances, waste and Emissions, Use of Energy and natural resources

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

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

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

Policy Statement health and Safety

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

ANKIT GEMS 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:

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

Policy Statement of Human Rights

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

- a) All employees in *ANKIT GEMS PVT LTD.* will be treated with equality, respect and dignity.
- b) *ANKIT GEMS PVT LTD.* believes in and respects the fundamental human rights according to the United Nations Universal Declaration of Human Rights.
- c) *ANKIT GEMS 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
- d) *ANKIT GEMS PVT LTD.* strongly discourages any form of sexually coercive, threatening, abusive or exploitative behavior.
- e) Any reported incidents relating to direct or indirect physical, sexual, racial, religious, psychological, verbal, or any other form of harassment or abuse, or any other form of intimidation or degrading treatment will not be tolerated by the Group.
- f) Security personnel, if employed by *ANKIT GEMS PVT LTD.* are trained to respect the human rights and dignity of all people and use of minimum force proportionate to the perceived threat.



Policy Statement Use of Security Personnel

The policies relating to this section are part of the Business Policies adopted by Ankit Gems Pvt Ltd. and are presented below for reference:

Security personnel, if employed by Ankit Gems Pvt Ltd. are trained to respect the human rights and dignity of all people and use of minimum force proportionate to the perceived threat.

Policy Statement Sexual Harassment at Workplace

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

- a) All employees in *ANKIT GEMS PVT LTD.* will be treated with equality, respect and dignity.
- b) *ANKIT GEMS PVT LTD* create and ensure a safe environment that is free of sexual harassment, including safety from persons/visitors coming into contact at the workplace
- c) *ANKIT GEMS PVT LTD* will not tolerate any sexual advances, requests for sexual favours, and verbal or physical conduct of a sexual nature are, implicitly or explicitly, made a term or condition of teaching/guidance, employment, participation, or evaluation of a person's engagement in any activity.
- d) *ANKIT GEMS PVT LTD* will not tolerate any sexual advances, and verbal, non-verbal and/or physical conduct such as loaded comments, remarks or jokes, letters, phone calls or e-mails, gestures, exhibition of pornography, lurid stares,
- e) Any reported incidents relating to direct or indirect physical, sexual, racial, religious, psychological, verbal, or any other form of harassment or abuse, or any other form of intimidation or degrading treatment will not be tolerated by the Group.
- f) *ANKIT GEMS PVT LTD* will take cognizance of complaints about sexual harassment, conduct enquiries, provide assistance and redressal to the victims, recommend punitive action or take immediate action against the harasser, if necessary.
- g) Security personnel, employed by *ANKIT GEMS PVT LTD.* are trained to respect the human rights and dignity of all people and use of minimum force proportionate to the perceived threat.

Policy on Supply Chain and Sourcing from Conflict Affected and High-Risk Areas

- a) *ANKIT GEMS PVT LTD* group recognizes that sourcing from conflict Affected and High-Risk Areas should be in accordance with OECD Framework.
- b) The Company shall procure natural rough diamonds from trusted supplier. The company shall complete the due diligence process prior to initiate business relationship. The Company shall purchase/sale diamonds that are fully compliant with KPCS
- c) *ANKIT GEMS PVT LTD* group are committed to adopt and implement supply chain in accordance with the OECD guidelines.
- d) As a management process the group shall adopt a risk-based due diligence process for responsible sourcing of minerals from conflict-affected and high-risk areas.
- e) *ANKIT GEMS PVT LTD* group will neither tolerate nor profit from, contribute to, assist or facilitate violation while sourcing from conflict affected regions.
- f) *ANKIT GEMS PVT LTD* group shall only buy or sell diamonds that are fully compliant with the Kimberley Process certification Scheme and, as such will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring diamonds from, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates.
- g) *ANKIT GEMS PVT LTD* group will immediately stop engaging with supplies if we find a reasonable risk that they are committing abuses or are sourcing from, or linked to, any party committing violations or providing direct or indirect support to non-state armed groups.
- h) *ANKIT GEMS PVT LTD* group shall train relevant employees on supply chain & Due Diligence Requirement and OECD guidelines at regular intervals. We shall also provide support to our business partners and stakeholders for the same.

- i) *ANKIT GEMS PVT LTD* group will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of minerals, or to misrepresent taxes, fees and royalties paid to governments for the purpose of extraction, trade, handling, transport and export of diamonds.
- j) *ANKIT GEMS PVT LTD* group 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 and export of diamonds.
- k) The company shall assign the responsibility of Supply Chain and Due diligence compliance to senior personnel of the organization to prevent any risk of illegal activities or breach of it. The company shall implement the management strategy to respond to identified risk if any. Compliance officer shall report to senior management in case of any such violation of this policy.

POLICY ON PUBLIC GRIEVANCES

ANKIT GEMS GROUP keeping in view of the increasing importance of public grievances, have introduced the common grievance cell under the group compliance officer to look in to matter of reporting noncompliance against any of the company policy or raising red flag against any of its business entity or individual involved in activities which will bring industry in disrepute.

PUBLIC GRIEVANCE COMMUNICATION DETAILS

1. **Compliance Officer:** Mr. Rajesh Kanadia / Kamlesh Thakkar
2. **Communication by Address:** EE-6011/EC 6100, Bharat Diamond Bourse,
Bandra Kurla Complex, Bandra East, Mumbai – 400051.
3. **Contact Number :** +91 9619495961
4. **Email address:** rajesh.kanadia@ankitgems.com / kamlesh.thakkar@ankitgems.com

ANNUAL HUMAN RIGHTS REPORT AND RESPONSIBLE SOURCING

As part of our commitment to responsible business practices, respect for human rights, and ethical sourcing, the Company's COP 6 & COP 7 Annual Human Rights Report and Annual Reporting on Responsible Sourcing and Due Diligence Mechanism are available upon request.

For any queries or requests related to these reports,
please contact:

Compliance Officer: Mr. Rajesh Kanadia / Mr. Kamlesh Thakkar

Email: rajesh.kanadia@ankitgems.com , Email: kamlesh.thakkar@ankitgems.com

We are committed to maintaining transparency, accountability, and continuous improvement in our human rights and responsible sourcing practices.