

**REVE DIAMONDS DMCC
POLICIES &
PROCEDURES
2025**

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REVE DIAMONDS DMCC

Unit No: AU-05-E, Gold Tower (AU), Plot No: JLT-PH1-I3A, Jumeirah Lakes Towers, Dubai, UAE
Phone: +97145852868; Email: sapna@revedmcc.com

Responsible Business Practices Policy

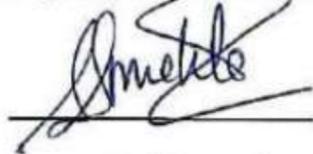
This Policy is endorsed at the highest level of Reve Diamonds DMCC and reflects our commitment to conducting our business in an ethical, socially responsible and sustainable manner.

We expect all employees, suppliers, and business partners to adhere to the principles outlined in this policy. These principles include respect for human rights, ethical conduct, environmental stewardship, and compliance with all applicable laws and regulations.

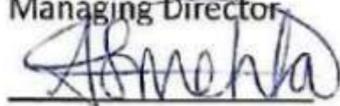
Policy Statements:

- **Human Rights:** We are committed to respecting and upholding the fundamental human rights of all individuals, including our employees, suppliers, and communities impacted by our operations. We will not tolerate any form of discrimination, forced labor, child labor, or other human rights abuses.
- **Ethical Conduct:** We conduct our business with honesty, integrity, and transparency. We adhere to high ethical standards in all our dealings with customers, suppliers, and other stakeholders, and expect the same in return. We prohibit bribery, corruption, and any other unethical behaviour.
- **Environmental Stewardship:** We are dedicated to minimizing our environmental footprint and promoting sustainable practices throughout our supply chain and operations. We strive to conserve natural resources, reduce waste, and mitigate the environmental impacts of our activities.
- **Compliance:** We comply with all applicable laws, regulations, and industry standards governing our business operations. We are committed to maintaining a culture of compliance and accountability, and we expect our employees and business partners to uphold legal and regulatory requirements.
- **Continuous Improvement:** We are committed to continuous improvement in our responsible business practices. We will regularly assess our performance, set measurable goals, and implement initiatives to enhance our social, environmental, and ethical performance.

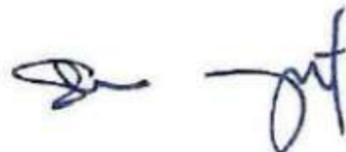
At Reve Diamonds DMCC, we recognize the need to operate in a responsible and ethical manner, and expect the same from all our customers, suppliers and other stakeholders.



Sapna Sachin Mehta
Managing Director



Arav Sachin Mehta
Executive Director



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Strategy to Promote Responsible Business Practices

Compliance Officer: Arav Mehta

1. Identify Significant Business Partners

- Use last 24 month purchase and sales data to identify key customers and suppliers

2. Perform Risk Assessment

- Check levels of risk for various criteria including AML, human rights, sourcing procedures, child labor, health and safety and more.
- Check industry accepted accreditations and certifications

3. Determine Level of Influence Over Partner

- Analyze the relationship with partner, as well as where we stand versus them in terms of responsible business practices.
- Where influence is high, try to make them engage in more responsible practices. Where influence is low, share our updates and progress.

4. Share Responsible Business Practices:

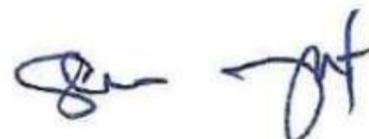
- Share key highlights of responsible business practices we have adopted and engaged in every year, through any means available

Approved by: Sapna Mehta

Signature: 



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Procedure for Monitoring Changes in Law and Ensuring Compliance

1. **Stay Updated with Changes in Legal Requirements:**
 - Constantly review new government sources of information including AML@economy.ae and the Executive Office for Control & Non-Proliferation.
2. **Assessment of Legal Changes:**
 - Upon identification of any legal changes, conduct a thorough assessment to understand their potential impact on the company's current policies and procedures.
3. **Internal Review and Policy Update:**
 - Review existing company policies and procedures to identify areas of misalignment with the new legal requirements.
 - Revise policies and procedures to ensure full compliance with the updated legal framework.
 - Seek help from legal experts or external counsel if required.
4. **Approval and Implementation:**
 - Submit the updated policies and procedures for internal approval by senior management.
 - Communicate the changes to all relevant departments and employees, ensuring understanding and adherence.
5. **Training and Awareness:**
 - Provide training sessions for employees as needed to ensure they are fully informed of new legal requirements and the updated policies and procedures.
6. **Ongoing Monitoring and Compliance:**
 - Continuously monitor the effectiveness of the changes, ensuring that the company remains in compliance with UAE law
 - These procedures should be followed immediately upon identification of relevant legal changes and as part of an annual review.

Approved by: Sapna Mehta

Signature:



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KYC Due Diligence Procedures

1. Introduction

Reve Diamonds DMCC is committed to ensuring the highest standards of compliance with regulatory requirements and the prevention of financial crime, including money laundering and the financing of terrorism. This KYC (Know Your Customer) Due Diligence Procedures document outlines the measures we adopt to verify the identity of our clients and to assess and manage potential risks.

This Policy applies to all employees and representatives of the Company involved in client onboarding, transaction monitoring, and regulatory compliance.

2. Purpose of the KYC Due Diligence Procedures:

The primary purpose is to:

- Prevent the Company from being involved in money laundering (ML) or financing of terrorism (CFT).
- Verify the identity of clients before establishing a business relationship.
- Identify and verify the source of funds and source of wealth of clients.
- Ensure compliance with local and international regulations, including those set by the Financial Action Task Force (FATF) and the UAE Central Bank.
- Maintain accurate and up-to-date records of clients and transactions.

3. Regulatory Framework

Reve Diamonds DMCC adheres to the following laws and regulations:

- UAE Federal Law No. 20 of 2018 on Anti-Money Laundering (AML) and Countering the Financing of Terrorism (CFT).
- Guidelines and regulations issued by the UAE Central Bank.
- International best practices as outlined by the Financial Action Task Force (FATF).
- Other applicable laws and regulatory guidelines.

4.1. Client Onboarding

a. Legal Entity:

When onboarding a legal entity (corporate client), the following documents and information must be provided for the identity verification process:

1. **KYC Form in UAE Format** – A completed KYC form, specific to the UAE regulatory requirements, to collect the necessary details about the company and its owners.
2. **Trade License** – A copy of the current trade license or commercial registration certificate issued by the relevant UAE or foreign authorities (e.g., the Department of Economic Development).



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3. **Tax/VAT Registration** – Proof of tax or VAT registration, if applicable, to verify the company's tax compliance status.
4. **Passport/ID of Company Owners/Directors** – Copies of valid passports or government-issued ID cards for all individuals holding a significant ownership or controlling position within the entity (typically directors, shareholders with over 25% ownership, etc.).
5. **Share Certificate** – A copy of the share certificate(s) detailing the ownership structure of the company, specifically identifying the shareholders and their respective ownership percentages.
6. **Certificate of Registration / Incorporation** – A certificate of registration/incorporation or other equivalent official registration documents that confirm the legal existence of the entity.
7. **Politically Exposed Person (PEP) Declaration** – A declaration to identify any individuals who hold or have held prominent public positions (e.g., government officials, senior politicians, etc.) or are related to such persons. This is crucial to assess any heightened risk and trigger enhanced due diligence (EDD).
8. **Undertaking Letter** – A signed letter from the company undertaking that they are not operating in any sanctioned countries.
9. **Source of Funds Letter** – A letter from the company confirming the source of its funds and wealth, including details about its revenue generation, operations, or any other legitimate sources of income.
10. **Screen on Intellegings Platform** – Once items 1-9 are received, the Company will be added to the Intellegings platform, which screens against all local and international watchlists. This is to ensure that no director or shareholder of the Company is blacklisted or involved in any bad activities.
11. **Risk Assessment** – Once all items 1-10 are received, the Company will perform a risk assessment on the customer/supplier in order to determine the level of risk and whether or not to onboard them.

b. Individual:

When onboarding an individual client, the following documents and information are required for the identity verification process:

1. **KYC Form in UAE Format** – A completed KYC form specific to the UAE regulatory framework, capturing necessary personal details of the individual.
2. **Passport/ID** – A copy of a valid government-issued identification document (e.g., passport, national ID card, or driver's license) to verify the individual's identity.
3. **Proof of Residency/Address** – A document confirming the individual's residential address, such as a utility bill, bank statement, or government-issued.

4.2. Enhanced Due Diligence (EDD)

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For higher-risk clients, whether individuals or legal entities, the Company will conduct Enhanced Due Diligence (EDD) procedures. EDD may be triggered by the following factors:

- Politically Exposed Persons (PEPs).
- High-risk jurisdictions (countries or regions with high levels of corruption, terrorism, etc.).

5. Ongoing Monitoring

The Company is committed to conducting ongoing monitoring of client accounts to detect and prevent suspicious activities.

- **Transaction Monitoring:**
Transactions will be regularly reviewed to detect unusual or potentially suspicious behaviour. Transactions that do not align with the client's profile or expected activity will be flagged for investigation.
- **Periodic Reviews:**
Clients' profiles will be reviewed periodically, especially in cases where there are material changes to the client's risk level or business activity.
- **Suspicious Activity Reporting:**
If any suspicious activities are detected, these will be reported to the appropriate authorities in accordance with regulatory requirements.

6. Client Information Updates

The Company requires clients to inform the Company of any changes to their personal or business information. Clients are required to provide updated documents whenever there are material changes, including:

- Changes in ownership or management for corporate clients.
- Changes in address, contact details, or identity documents for individual clients.

7. Data Protection and Confidentiality

Reve Diamond DMCC ensures that all personal and financial information collected from clients is handled with the highest level of confidentiality and stored securely. The Company will not disclose any client information unless required by law or as part of regulatory obligations.

- All client records will be kept for a minimum of 5 years after the end of the business relationship, or as required by local regulations.

8. Training and Awareness

The Company will provide ongoing training to its employees to ensure they understand and comply with the KYC and AML/CFT regulations. Training includes:

- Identifying suspicious activity.

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- Understanding client risk profiles.
- Procedures for reporting suspicious transactions.

Employees will be tested regularly to ensure their knowledge is up-to-date.

9. Consequences of Non-Compliance

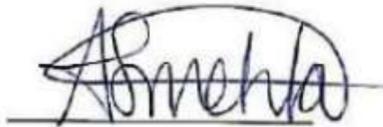
Failure to comply with these KYC Due Diligence Procedures may result in the termination of the business relationship with the client and potential legal consequences for the Company and its employees. Non-compliance may also expose the Company to significant reputational and financial risks.

10. Review of the KYC Procedures

This KYC Due Diligence Procedures document will be reviewed periodically to ensure it remains compliant with current regulations, best practices, and the Company's business operations. Updates to the policy will be communicated to all relevant employees and stakeholders.



Sapna Sachin Mehta
Managing Director



Arav Sachin Mehta
Executive Director



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Supply Chain & Due Diligence Policy

Policies

1. Introduction:

At Reve Diamonds DMCC, we are committed to supporting responsible sourcing practices in our supply chain, particularly to avoid sourcing from conflict-affected and high-risk areas (CAHRAs).

This Supply Chain Policy outlines our commitment to ethical sourcing, risk mitigation, and compliance with industry standards, including the Kimberley Process Certification Scheme (KPCS) and System of Warranties (SoW) requirements for diamonds.

2. Responsible Sourcing from CAHRA's:

We recognize the importance of responsibly sourcing diamonds and other gemstones to mitigate the risks associated with conflict financing and human rights abuses in conflict-affected and high-risk areas. We are committed to:

- Conducting due diligence to identify and assess the risks of sourcing from CAHRAs, including but not limited to regions known for conflict diamonds, child labor, forced labor, and environmental degradation.
- Implementing measures to mitigate these risks, including engaging with suppliers, conducting regular audits and assessments, and promoting transparency and traceability in our supply chain.

3. Kimberley Process Certification Scheme (KPCS):

For diamonds, we adhere to the requirements of the Kimberley Process Certification Scheme (KPCS), an international initiative aimed at preventing the trade of conflict diamonds. We do not source rough diamonds ourselves, but ensure that all our polished diamonds are only sourced from KPCS-compliant suppliers.

4. System of Warranties (SoW) Requirements:

We also adhere to the System of Warranties (SoW) requirements established by the World Diamond Council (WDC) for the sale of polished diamonds. We require our suppliers to provide written assurances that their diamonds are sourced from legitimate sources and are not involved in funding conflicts or human rights abuses.

5. Risk Associated with CAHRA's:

Sourcing from conflict-affected and high-risk areas (CAHRAs) presents several risks that need to be carefully considered and managed. Some of the key risks associated with CAHRAs include:

1. **Conflict Financing:** Sourcing from CAHRAs may inadvertently contribute to the financing of conflicts and armed groups, as revenues from the trade of natural resources, including

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diamonds and other minerals, can be used to fund armed conflict, violence, and human rights abuses.

- 2. Human Rights Violation:** CAHRAs are often associated with widespread human rights violations, including forced labor, child labor, and other forms of exploitation. Sourcing from these areas increases the risk of indirectly supporting or benefiting from these unethical practices.
- 3. Labour Rights Abuses:** Workers in CAHRAs may be subjected to unsafe working conditions, inadequate wages, and other labor rights abuses. This can include forced labor, child labor, discrimination, and lack of access to basic rights and protections.
- 4. Environmental Degradation:** The extraction and processing of natural resources in CAHRAs can lead to environmental degradation, including deforestation, pollution of air and waterways, and habitat destruction. This can have long-term ecological impacts on local ecosystems and biodiversity.
- 5. Legal and Regulatory Risks:** Sourcing from CAHRAs may pose legal and regulatory risks, including violations of international sanctions, trade restrictions, and anti-money laundering laws. Non-compliance with relevant regulations can result in legal consequences, financial penalties, and reputational damage.
- 6. Reputational Damage:** Engagement in practices associated with CAHRAs can tarnish a company's reputation and brand image. Consumers, investors, and other stakeholders increasingly demand transparency and ethical sourcing practices, and any association with human rights abuses or conflict can lead to loss of trust and credibility.
- 7. Security Risks:** Operating in or sourcing from CAHRAs may expose companies and their personnel to security risks, including violence, theft, extortion, and kidnapping. Ensuring the safety and security of employees, suppliers, and stakeholders becomes paramount in such environments.

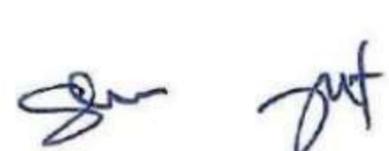
Overall, the risks associated with sourcing from conflict-affected and high-risk areas are multifaceted and require careful assessment, mitigation, and management strategies to ensure ethical and responsible business practices.

Due Diligence & Mitigation

Reve Diamonds DMCC has adopted the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs). We follow a structured 5-step framework and integrate Know Your Counterparty (KYC) and Human Resources (HR) procedures to ensure a comprehensive approach.

Step 1: Establish Strong Company Management Systems

- **Policy Adoption:** All policies have been carefully drafted and employees have bought into them with various internal meetings and training.
- **Internal Oversight:** Compliance Officer monitors supply chain due diligence and risk escalation.
- **Supplier Specificity:** Only suppliers that ensure compliance with KPCS, SoW, and non-involvement in human rights abuses are onboarded.
- **KYC Alignment:** Conduct thorough counterparty KYC including:
 - Trade licenses

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- Corporate structure/Ultimate beneficial owner checks
- Passport copies
- Declaration and undertakings
- Sanctions screening

Step 2: Identify and Assess Supply Chain Risks

- **Risk Assessment:** Carry out a risk assessment and only onboard suppliers that demonstrate low level of risk in terms of their supply chain sourcing.
- **Transaction Monitoring:** Flag high-risk countries or transactions with insufficient documentation.

Step 3: Design and Implement Risk Mitigation Strategies

- **Engagement Plans:** For medium-risk suppliers, implement improvement plans with time-bound milestones (e.g., achieving RJC or equivalent certification).
- **Suspension Protocols:** If a supplier is found to be non-compliant and uncooperative, transactions will be paused until corrective actions are taken.
- **Human Rights Safeguards:** Ensure that any supplier or subcontractor can demonstrate adherence to labor rights (e.g., no forced/child labor), with spot checks conducted by third-party auditors where feasible. De Beers Sightholder and RJC certification are deemed sufficient to confirm this.

Step 4: Internal Audit of Supply Chain Due Diligence

- **Internal Spot Checks:** Random sampling of shipments and invoices for verification of origin, documentation consistency, and declared provenance.
- **Reviews:** Reviews of supply chain due diligence and documentation.

Step 5: Report and Communicate

- **Incident Logging:** Maintain a log of any supply chain risk incidents, investigations, or corrective actions. Any indication of non-compliance, unethical sourcing, or provenance misstatement will trigger an internal investigation.
- **Risk Confirmation:** If a risk is confirmed, Reve Diamonds DMCC will:
 - Suspend the transaction
 - Alert legal authorities or industry bodies if needed
 - Take remedial action with the supplier or terminate the relationship

Public Accessibility:

We are committed to transparency and accountability in our supply chain practices. This Supply Chain Policy is publicly accessible on our company website and other relevant communication channels. We encourage stakeholders, including customers, investors, and the general public, to review our policy and learn about our commitment to responsible sourcing.

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Continuous Improvement:

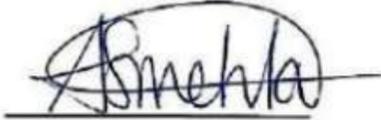
We are committed to continuously improving our supply chain practices and promoting responsible sourcing throughout our industry. We will regularly review and update this policy to reflect changes in regulations, industry standards, and best practices.

Conclusion:

At Reve Diamonds DMCC, we believe that responsible sourcing is essential to the integrity and sustainability of our business. Through our Supply Chain Policy, we reaffirm our commitment to ethical sourcing practices, risk mitigation, and compliance with industry standards to ensure the integrity of our products and contribute to positive social and environmental outcomes.



Sapna Sachin Mehta
Managing Director



Arav Sachin Mehta
Executive Director



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Provenance Claims Policy & Procedures

Statement of Commitment

At Reve Diamonds DMCC, we recognize that transparency, trust, and integrity are fundamental to our success and our reputation in the global diamond trade. We are committed to making accurate, responsible, and verifiable provenance claims for all diamonds we trade.

We affirm that any statement made regarding the origin, treatment status, or ethical sourcing of our diamonds will be:

- Truthful,
- Documented,
- Verifiable, and
- Aligned with international industry standards and regulations.

We will not make any provenance claim unless we possess and maintain sufficient documentation to support it.

Provenance Claims Assessment

Reve Diamonds DMCC extensively assesses each of its invoices to check for provenance claims related to conflict-free and ethical sourcing, natural and untreated origin, non-Russian origin and country of rough/manufacturing origin.

1. Conflict-Free and Ethical Sourcing

- **Language Used:**
 - "The diamonds herein invoiced have been purchased from legitimate sources not involved in funding conflict..."
 - "The seller hereby guarantees that these diamonds are conflict free..."
 - "Confirms adherence to the WDC SoW Guidelines..."
 - "The seller warrants that these products have been supplied in compliance with the Signet Responsible Sourcing Protocol (SRSP)."
 - "The diamonds have not been obtained in violation of applicable national laws and/or sanctions by the U.S. Department of Treasury's Office of Foreign Assets (OFAC)."

✓ This is a provenance claim, as it speaks to the ethical origin and legality of the diamonds.

2. Natural Origin and Untreated

- **Language Used:**

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- "The diamonds herein invoiced are exclusively of natural origin and are untreated based on personal knowledge and/or written guarantees provided by the supplier..."

✓ **This is a provenance claim**, as it refers to the nature and treatment status of the diamond, implying a traceable and verified supply chain.

3. Non-Russian Origin

- **Language Used:**
 - "The invoice does not contain any diamond (or product containing diamonds) which originated from, manufactured in or transited through Russia..."

✓ **This is a provenance claim**, particularly relevant for sanctions compliance and often required in G7 countries.

4. Country of Rough or Manufacturing Origin

- Several invoices mention the country of rough origin or country of manufacturing origin

✓ **This is a provenance claim**, as it refers to the specific country of mining or polishing.

Supporting Documentation

For every claim that we make on our sales and consignment invoices, we ensure that we have the same from our suppliers on our purchase invoices. These will be matched and tallied regularly to ensure compliance.

A. Documents Checked:

- **Supplier invoices:**
 - SoW Declarations
 - Written guarantees
 - Untreated and natural origin declarations
 - Non-Russian declarations
 - Country of rough origin / country of manufacturing origin declarations
- **Supplier packing lists:**
 - Country of rough origin / country of manufacturing origin declarations
- **Supplier letters:**

Signature *DE*

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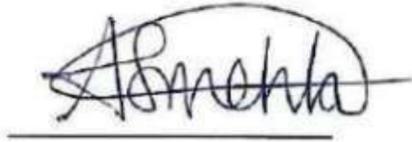
- Non-Russian declaration with sign and stamp
- Certificates:
 - GIA/HRD/IGI reports confirming natural and untreated origin

B. Internal Controls & Due Diligence

- Maintenance of a due diligence system that records:
 - Supplier KYC
 - Internal policy on sourcing practices
 - Periodic supplier audits or reviews
- Ensure all staff issuing invoices are aware of provenance claims, and match them to purchase invoices to ensure they are fully traceable with documentation
- Compliance officer must review random samples and verify the documentation regularly
- Evidence will be provided to any customers that are seeking proof or verification to substantiate our provenance claims. Since most of evidence is in the form of supplier invoices, names might be redacted to ensure confidentiality and operational integrity.
- Maintain all records



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Product Disclosure Policy & Procedures

1. Conflict-Free Sourcing

Reve Diamonds DMCC strictly adheres to the **Kimberley Process Certification Scheme (KPCS)** and the **World Diamond Council's System of Warranties (WDC SoW)** to ensure all diamonds are sourced ethically and responsibly.

Invoice Statement:

"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."

Verification Measures:

- We require all our **suppliers** to include the same WDC SoW statement on their invoices.
- We only procure diamonds from reputable, vetted suppliers with documented supply chain compliance.
- All processes are conducted in line with UAE Federal Law No. 20 of 2018 on Anti-Money Laundering and Combating the Financing of Terrorism and Illegal Organisations.

2. Disclosure of Natural and Untreated Origin

Reve Diamonds DMCC exclusively deals in **natural, untreated diamonds**. We ensure full transparency and consumer protection through the following:

Invoice Statement:

"The diamonds herein invoiced are exclusively of natural origin and are untreated based on personal knowledge and / or written guarantees provided by the supplier of these diamonds."

Verification Measures:

- All incoming diamonds are screened using **diamond verification equipment** to ensure there are no lab-grown stones.
- Diamonds with inscriptions are **checked physically** to match certificates and ensure natural origin.
- We require all our suppliers to include the same statement on their invoices.
- As per the UAE's regulations on consumer protection and fair trading practices, misrepresentation of product origin may result in fines, trade license suspensions, or criminal proceedings under the UAE Commercial Transactions Law.



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3. G7 Russian Origin Compliance

For shipments to **G7 countries**, we comply fully with the ban on Russian-origin diamonds, including those that may have been transformed outside the Russian Federation.

Declaration on all G7-bound shipments:

"I certify that the non-industrial diamonds in this shipment were not mined, extracted, produced, or manufactured wholly or in part in the Russian Federation, notwithstanding whether such diamonds have been substantially transformed into other products outside of the Russian Federation."

Verification Measures:

- This declaration is **required from all suppliers** for every relevant shipment.
- Terms of business contracts explicitly require **ongoing compliance** and written assurance.
- Supporting documentation (purchase invoices) is retained for **audit and traceability**.
- Non-compliance with G7 origin requirements may result in penalties under UAE Customs and Ministry of Economy regulations, including the confiscation of goods or export prohibitions.

4. Provision of Complete Diamond Information to Customers

To ensure transparency and customer confidence, all customers must receive comprehensive details about the diamonds they purchase.

Disclosure Methods:

- Diamond information should be provided **either through a gemological certificate (e.g., GIA, HRD, IGI), a detailed packing list, or by listing all critical attributes directly on the invoice.**
- These attributes must include (as applicable): shape, carat weight, color, clarity and certificate number.

Importance:

- Enables informed purchasing decisions
- Reduces chances of misunderstanding or dispute
- Reinforces trust in Reve Diamonds DMCC's ethical practices

Record Keeping:

- Copies of all certificates and/or packing lists must be retained alongside the invoice.
- Sales teams must ensure that no sale is completed without issuing at least one of the three forms of disclosure documentation.

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REVE DIAMONDS DMCC

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5. Ongoing Oversight

- All staff involved in purchasing, quality control, and sales are trained in the importance of disclosure and compliance.
- Regular **internal reviews** are conducted to verify consistency and address any updates to regulatory requirements.
- Accurate and complete record-keeping is mandatory and will be retained for a minimum of five years in compliance with UAE Federal Law No. 2 of 2015 on Commercial Companies and FTA tax audit requirements.
- Any staff found intentionally misrepresenting product information or failing to uphold this policy may face disciplinary action including termination and potential legal consequences.



Sapna Sachin Mehta
Managing Director



Arav Sachin Mehta
Executive Director



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Natural Diamond Testing & Verification Protocol

1. Purpose

To ensure the integrity and authenticity of all diamonds handled by Reve Diamonds DMCC through a systematic and reliable verification process. This protocol minimizes the risk of synthetic diamonds entering the supply chain and ensures compliance with international and local standards.

2. Scope

This protocol applies to all natural polished diamonds purchased, returned, received from certification/memo, or prepared for sale.

3. Verification Process

3.1. When Diamonds Are Tested

All diamonds are tested at the following stages:

- Upon **initial purchase** from a supplier
 - Upon **return** from external processes (e.g., IGI certification, customer memo, repair)
 - **Before final sale** to a customer or retailer
-

3.2. Testing Methodology

- The **Yehuda Sherlock Holmes Watson** diamond verification machine is used as the primary tool for detecting synthetic diamonds.
 - This machine is recognized for its high accuracy in identifying lab-grown diamonds using advanced spectroscopy.
 - If the diamond emits a blue color glow around it, it is confirmed as natural. If any other color is shown, it needs further verification.
 - If a diamond is flagged for **referral or requires further verification**, it will be sent to the IGI (**International Gemological Institute**) for professional lab analysis and reporting.
-

3.3. Physical and Certificate Matching

- All diamonds must be weighed on a calibrated **digital carat scale** to verify that the weight matches the accompanying certificate.
- The **laser inscription** must be cross-checked manually using a 10x or higher magnification loupe to ensure that it matches the certificate number and diamond details.

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4. Documentation and Record Keeping

- Any discrepancies (mismatched inscription, weight variance, machine referral) must be recorded and investigated.
- Results of third-party verifications (e.g., IGI reports) must be stored and linked to the respective diamond in the inventory system.
- Yehuda subscription allows for storage of data related to diamond testing. This can be provided to customers upon request.

5. Staff Training

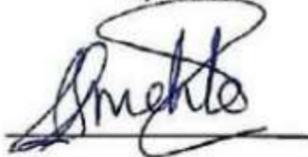
- All relevant staff will receive training on proper machine usage, interpretation of results, and manual verification techniques.
- Annual refresher training will be held to incorporate any machine/software updates or protocol improvements.

6. Non-Conformance Protocol

- If a diamond fails the Watson test or shows inconsistency with its certificate:
 - It is immediately quarantined and removed from saleable inventory.
 - Sent to IGI for further testing.
 - If it is determined to be a synthetic diamond, the supplier is notified, and a formal investigation is initiated.

7. Review & Continuous Improvement

- This protocol will be reviewed **annually** or upon the acquisition of new verification technology.
- Adjustments will be made based on audit results, industry developments, or regulatory updates.



Sapna Sachin Mehta
Managing Director



Arav Sachin Mehta
Executive Director



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Anti-Bribery and Corruption Policy

1. Policy Statement:

Reve Diamonds DMCC is committed to conducting its business ethically, with integrity, and in compliance with all applicable laws and regulations, including those related to anti-bribery and corruption. Reve Diamond DMCC prohibits any form of bribery, corruption, or unethical inducements in all of its business activities, including but not limited to, interactions with government officials, clients, suppliers, and other third parties.

2. Compliance with Laws and Regulations:

- The Company and its employees shall comply with all relevant anti-bribery and corruption laws and regulations of the United Arab Emirates (UAE), including but not limited to the UAE Penal Code and any other applicable international laws.
- Employees are required to familiarize themselves with the provisions outlined in Articles 234-239 of the UAE Penal Code, which specifically address anti-bribery and corruption offenses, and ensure strict adherence to these provisions in all business dealings.

3. Prohibited Conduct:

- **Bribery and Corruption:** No employee, contractor, consultant, agent, or representative of the Company shall directly or indirectly offer, promise, give, request, or accept any bribe, kickback, or improper inducement, whether monetary or non-monetary, to or from any individual, company, government official, or any other entity, with the intent to obtain or retain business or gain any improper advantage.
- **Facilitation Payment:** Facilitation payments, often referred to as "grease payments," are strictly prohibited. Employees shall not make or accept facilitation payments to expedite routine governmental actions or obtain preferential treatment.
- **Gifts, Entertainment, and Hospitality:** While the exchange of gifts, entertainment, and hospitality is a common business practice, employees must exercise caution to ensure that such gestures are reasonable, proportionate, and comply with applicable laws and regulations. Gifts, entertainment, or hospitality shall not be offered or accepted if they could influence, or be perceived to influence, business decisions or create a conflict of interest.
- **Conflict of Interest:** Employees must avoid situations where their personal interests' conflict with the interests of the Company. Any actual or potential conflicts of interest must be disclosed promptly to the appropriate management or the Compliance Officer.



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4. Reporting Violations & Whistleblower Protection:

Employees who suspect or become aware of any violations of this policy are required to report such conduct immediately to their supervisor or the Compliance Officer.

Any employee who reports in good faith will be protected from dismissal, demotion, harassment, or any other form of retaliation. All claims will be taken seriously and investigated promptly and impartially.

5. Training and Awareness:

The Company will provide regular training sessions and communication initiatives to ensure that all employees understand their obligations under this policy and are equipped to identify and address potential risks of bribery and corruption in their respective roles.

6. Consequences of Violations:

Violations of this policy may result in disciplinary action, up to and including termination of employment or contract, as well as civil or criminal penalties in accordance with applicable laws and regulations.

7. Review and Amendment:

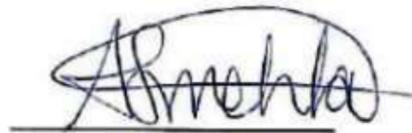
This policy shall be reviewed periodically and may be amended as necessary to ensure its effectiveness and alignment with the Company's objectives, changes in legislation, and evolving best practices in the field of anti-bribery and corruption.

8. Conclusion:

Reve Diamond DMCC is committed to upholding the highest standards of ethical conduct and integrity in all aspects of its business operations. By adhering to this Anti-Bribery and Corruption Policy, employees and representatives contribute to maintaining the Company's reputation for honesty, transparency, and trustworthiness.



Sapna Sachin Mehta
Managing Director



Arav Sachin Mehta
Executive Director



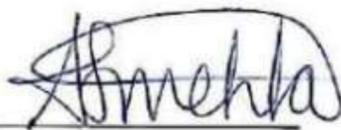
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Procedure for Identifying and Monitoring Bribery Risks

1. **Establish Anti-Bribery Policies**
 - Communicate a zero-tolerance policy across the company.
 - Train employees regularly on anti-bribery laws and conduct.
2. **Identify High-Risk Areas**
 - Review all business functions like procurement, sales, and finance for bribery risks.
3. **Assess Third-Party Risk**
 - Perform due diligence on customers, suppliers, contractors, and agents.
 - Use a risk rating system to evaluate potential bribery risks.
 - Identify any Politically Exposed Persons (PEP) during KYC onboarding procedure.
4. **Monitor and Report**
 - Implement internal controls to track suspicious transactions.
 - Encourage whistleblowing and maintain an audit trail of all activities.
5. **Regular Risk Reviews**
 - Annually reassess risk areas and update risk management strategies.
 - Conduct periodic internal audits.
6. **Take Corrective Actions**
 - Investigate any bribery allegations promptly.
 - Implement corrective actions, including sanctions and legal action if necessary.
7. **Continuous Improvement**
 - Gather feedback and adjust policies as needed.
 - Regularly update training and monitoring processes.



Arav Sachin Mehta
Compliance Officer

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Zero Cash Acceptance Policy

Applies to: All employees, agents, representatives, and third-party partners of Reve Diamonds DMCC.

Legal Requirement:

As per UAE Cabinet Decision No. (10) of 2019 and guidance from the UAE Ministry of Economy:

- The maximum cash acceptance threshold for Designated Non-Financial Businesses and Professions (DNFBPs) is AED 55,000.
- Any cash transaction at or above this limit must be:
 - Reported through a Cash Transaction Report (CTR) to the UAE Financial Intelligence Unit (GoAML portal)
 - Accompanied by full KYC/ID verification
 - Properly documented and retained
- However, even below AED 55,000, DNFBPs need to remain vigilant, record all cash transactions, and perform risk-based assessments.

1. Policy Statement

Though legally allowed with the right procedures, Reve Diamonds DMCC enforces a **strict zero-cash acceptance policy**. We do not accept, process, or transact in cash under any circumstance, regardless of the amount involved.

All transactions must be conducted through traceable and auditable channels such as:

- Bank transfers
- Cheques (from UAE licensed banks)

2. Scope

This policy applies to:

- All domestic and international clients,
- All purchases, sales, deposits, and fees,
- All employees, agents, and external representatives.

3. Prohibited Transactions

The following are strictly prohibited:

- Accepting any cash payment for goods or services

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- Making payments to third parties in cash
- Splitting payments to avoid reporting thresholds
- Converting digital payments into cash on behalf of clients

4. Reporting Violations

Any employee who is:

- Offered cash by a client,
- Aware of an attempted circumvention of this policy, or
- Witnessing cash-related misconduct,

must report it immediately to the Compliance Officer or through the internal whistleblower channel. Failure to report may result in disciplinary action

5. Sanctions for Breach

Violation of this policy will result in:

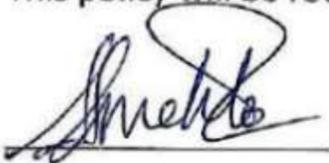
- Disciplinary action, up to and including termination,
- Reporting to UAE regulatory authorities,
- Criminal or civil liability under UAE AML laws.

6. Training and awareness

All staff will receive annual training on AML/CFT compliance and this policy. This policy will also be included in onboarding for all new hires.

7. Review

This policy will be reviewed upon changes in UAE regulations.



Sapna Sachin Mehta
Managing Director



Arav Sachin Mehta
Executive Director



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Investigation & Sanctions Protocol for Corrupt Practices

A. Triggering an Investigation

- Receipt of a report via the whistleblower system or compliance team.
- Suspicion raised during audits, due diligence, or internal reviews.

B. Investigation Process

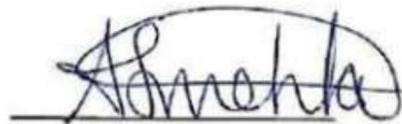
1. **Initial Assessment** (within 3 business days):
 - Determine if there is sufficient information to proceed.
2. **Full Investigation:**
 - Appoint an internal or external investigator.
 - Review documentation, communications, and financial records.
 - Interview relevant employees and third parties.
3. **Findings Report:**
 - Final report submitted to management within 15 working days.
 - Decision on breach and recommendation of actions.

C. Potential Sanctions

Breach Type	Sanction Options
Minor Violation (e.g., accepting a small unauthorized gift)	Written warning, mandatory training
Moderate Violation (e.g., undeclared conflict of interest)	Suspension, probation, retraining
Major Violation (e.g., payment of bribes, facilitation payments, or concealment)	Termination, legal referral, reporting to authorities



Sapna Sachin Mehta
Managing Director



Arav Sachin Mehta
Executive Director

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Human Rights Policy

1. Commitment to Human Rights

At Reve Diamonds DMCC, we are dedicated to ensuring that all our operations, from sourcing to selling, respect human rights and are in line with UN guiding principles. This includes maintaining a zero-tolerance policy for forced labour, child labour, and any form of exploitation within our supply chain and business practices.

2. Responsible Sourcing

- **Conflict-Free Diamonds:** We exclusively source polished diamonds from trusted suppliers who are certified by the Kimberley Process and comply with international standards for conflict-free sourcing. We ensure that none of our diamonds come from conflict-affected and high-risk areas where human rights violations are prevalent.
- **Due Diligence:** As part of our daily operations, we continuously vet our suppliers, reviewing their compliance with human rights regulations and their impact on local communities. We prioritize suppliers who share our commitment to ethical business practices and human rights.

3. Employee Training

We provide ongoing training for our employees to raise awareness about human rights and their responsibilities in upholding these standards in their daily tasks. This training empowers our team to identify potential human rights violations and report them promptly.

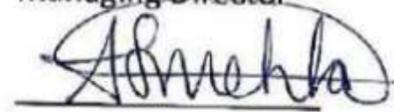
4. Continuous Improvement

We regularly review our operations to ensure our human rights practices stay current and effective. Feedback from suppliers, employees, and stakeholders is considered in our process to continually enhance our standards.

5. Transparency & Reporting

We believe in open communication. Reve Diamonds DMCC provides stakeholders with regular updates on our efforts to ensure human rights in our operations, including our sourcing practices and supply chain integrity.


Sapna Sachin Mehta
Managing Director


Arav Sachin Mehta
Executive Director



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Human Rights Due Diligence Process

1. Commitment to Human Rights

- **Objective:** Demonstrate a clear commitment to human rights, ensuring that operations are free from practices that violate human rights.
- **Actions:** We established Human Rights Policies and Procedures that we always strive to adhere to.

2. Risk Assessment

- **Objective:** Identify potential human rights risks within our operations and supply chain.
- **Actions:**
 - We map our supply chains and assess the regions and industries where we source from for human rights risks.
 - We conduct internal assessments to understand risks within our business activities.

3. Supplier Evaluation

- **Objective:** Evaluate the human rights practices of suppliers and partners.
- **Actions:**
 - We require suppliers to adhere to our human rights standards, as outlined in our policies.
 - We made sure that we are partnering only with reputable companies by doing enhanced due diligence.

4. Action and Mitigation

- **Objective:** Take action to address and mitigate human rights risks.
- **Actions:**
 - For identified risks, we develop clear action plans to address them.
 - We must engage with suppliers or partners where risks are identified, and encourage corrective measures.
 - For severe cases, we must consider shifting away from suppliers or business practices that contribute to human rights abuses.

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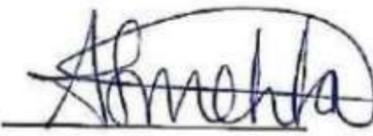
5. Monitoring and Review

- **Objective:** Continuously track the effectiveness of human rights due diligence efforts.
- **Actions:**
 - Must regularly review our human rights due diligence process, and update policies or practices as necessary.
 - Have a face-to-face discussion to ensure compliance with human rights standards.
 - Engage employees and suppliers in feedback processes to identify potential gaps.

6. Reporting and Transparency

- **Objective:** Ensure transparency and accountability.
- **Actions:**
 - Share findings from due diligence efforts and actions taken to improve human rights practices with key stakeholders.
 - Provide clear channels for employees, suppliers, and stakeholders to report any human rights violations or concerns.


Sapna Sachin Mehta
Managing Director


Arav Sachin Mehta
Executive Director



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Child Labor & Forced Labor Policy

1. Purpose

Reve Diamonds DMCC is fully committed to upholding human rights, including the rights and welfare of children and all workers, and to strictly complying with the laws and international standards prohibiting **child labor and forced labor**. This policy outlines our position on these issues and the measures in place to ensure compliance.

2. Legal Framework (UAE Law)

Under Federal Decree-Law No. 33 of 2021 (UAE Labor Law) and subsequent cabinet decisions:

- The minimum age for employment in the UAE is 15 years.
- Persons aged between 15 and 18 are considered "young workers" and may only be employed under strict conditions, including:
 - No hazardous work
 - Limited working hours
 - Medical fitness certification
 - Parental or guardian consent

Forced labor, including any work or service that is extracted from any person under the menace of any penalty and for which the person has not offered themselves voluntarily, is strictly prohibited under UAE law and international standards.

Reve Diamonds DMCC takes a stricter stance in line with international best practices.

3. Company Policy

Reve Diamonds DMCC maintains a **zero-tolerance policy for both child labor and forced labor**.

- We only employ individuals aged 18 years and above.
- We do not engage in, support, or benefit from child labor or forced labor in any form.
- We expect all suppliers, contractors, and partners to uphold the same standards and to ensure that child labor and forced labor are not present in any part of their operations or supply chains.

4. Age and Employment Verification Procedures

To ensure compliance, Reve Diamonds DMCC:

- Verifies age documentation (such as passport, Emirates ID, or birth certificate) for all prospective employees before hiring.
- Screens for any signs of coercion, deception, or involuntary work conditions during recruitment.
- Maintains copies of verified documents in employee personnel files.

5. Monitoring and Audits

- Internal reviews and audits of recruitment records and working conditions are conducted periodically to ensure compliance.
- Due diligence is carried out on suppliers and partners to assess their labor practices.
- Any suspected violation—whether of child labor or forced labor—will be investigated promptly and appropriate corrective actions taken, including reporting to relevant authorities if required.

6. Reporting Violations

Any employee or third party who becomes aware of a potential issue related to child labor or forced

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labor must report it immediately to the Executive Director or HR Manager. Reports will be treated confidentially and investigated thoroughly, without retaliation.

7. Non-Compliance Consequences

Any confirmed breach of this policy will result in:

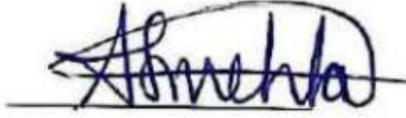
- Disciplinary action, up to and including termination of employment or contract
- Termination of agreements with suppliers or agencies violating the policy
- Reporting to relevant legal authorities as applicable under UAE law

8. Policy Review

This policy will be reviewed annually or as needed to reflect updates in UAE legislation, international standards, or internal business practices.



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Managing Director



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Anti-Human Trafficking Policy

1. **Commitment to Combat Human Trafficking**

Reve Diamonds DMCC is committed to preventing human trafficking in all its forms and ensuring our operations align with UAE laws, including Federal Law No. 51 of 2006. We maintain a zero-tolerance policy towards human trafficking, forced labour, and other forms of exploitation in our business activities.

2. **Definition of Human Trafficking**

Human trafficking includes various forms of exploitation, such as sexual exploitation, forced labour, servitude, and coerced service. The UAE law defines and criminalizes these practices under Federal Law No. 51 of 2006, which we fully adhere to in all our operations.

3. **Company Stance**

We unequivocally condemn human trafficking and exploitation. We ensure our supply chains and business activities are free from any form of human trafficking.

4. **Compliance with UAE Laws**

Reve Diamonds DMCC is committed to complying with all UAE regulations related to human trafficking, ensuring we meet and exceed the legal standards set out in Federal Law No. 51 of 2006 and subsequent amendments.

5. **Prevention Measures**

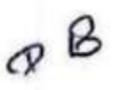
- **Supplier Due Diligence:** We rigorously vet our suppliers and partners to ensure they adhere to ethical practices and share our commitment to preventing human trafficking.
- **Employee Awareness:** We train employees to recognize signs of human trafficking and encourage them to report suspicious activities to the proper authorities.

6. **Reporting Mechanisms**

- **Whistleblower Protection:** We offer a confidential reporting system for employees, suppliers, and stakeholders to report any suspected human trafficking activities without fear of retaliation.
- **Cooperation with Authorities:** Reve Diamonds DMCC cooperates fully with UAE law enforcement and authorities to investigate and address any human trafficking concerns.

7. **Continuous Improvement**

- **Review & Monitoring:** This policy will be periodically reviewed to ensure its effectiveness and alignment with legal, regulatory, and industry standards.

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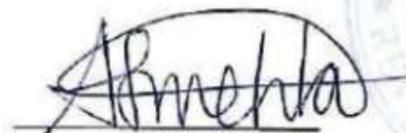
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- **Ongoing Education:** We are committed to continuously educating ourselves and our partners about the risks and signs of human trafficking and how to prevent it.

8. Conclusion

Reve Diamonds DMCC reaffirms its commitment to preventing human trafficking and exploitation. By adhering to this policy and collaborating with stakeholders and authorities, we aim to contribute to the global effort to eradicate human trafficking.


Sapna Sachin Mehta
Managing Director


Arav Sachin Mehta
Executive Director



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Workplace Harassment Policy and Procedures

1. Policy Statement

Reve Diamonds DMCC is committed to fostering a safe, inclusive, and respectful work environment for all employees. All forms of violence and harassment in the workplace are strictly prohibited. This policy reflects our zero-tolerance approach toward any conduct that undermines the dignity or safety of individuals.

2. Scope

This policy applies to all employees, contractors, visitors, interns, and any third parties interacting with Reve Diamonds DMCC, whether on-site, remote, or during company-related events or travel.

3. Prohibited Conduct

Violence and harassment in the workplace include, but are not limited to:

- Corporal punishment
- Harsh, degrading, or humiliating treatment
- Sexual harassment or physical harassment
- Mental, physical, verbal, or sexual abuse
- Retaliation for complaints or reports made in good faith
- Coercion or threats
- Intimidation or bullying
- Any direct or indirect form of harassment

These behaviors are unacceptable in all workplace facilities and during any work-related interactions.

4. Responsibilities

Employers and Managers

- Ensure a workplace free from violence and harassment
- Communicate this policy clearly and regularly to all employees
- Model respectful behavior at all times
- Respond promptly and appropriately to any complaints or concerns

All Employees

- Treat colleagues, clients, and partners with dignity and respect
- Refrain from engaging in any form of harassment or violence
- Report incidents or concerns promptly and in good faith
- Cooperate fully with any investigations



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5. Procedures for Reporting and Addressing Incidents

5.1 Reporting Mechanisms

Employees can report any incidents of workplace violence or harassment through one of the following channels:

- Directly to their immediate supervisor or manager
- To the Human Resources department
- Via the company's grievance mechanism

5.2 Support for Victims

Reve Diamonds DMCC is committed to supporting victims of workplace violence and harassment by:

- Providing immediate protection from further harm
- Offering access to counseling or external support services (where applicable)
- Making reasonable accommodations during investigations (e.g., changes in work assignments or location)

5.3 Investigation and Resolution

All reported incidents will be:

- Investigated promptly, impartially, and confidentially
- Handled with sensitivity and in a manner that protects all parties involved
- Documented thoroughly with findings and outcomes recorded

The accused will be given an opportunity to respond to or appeal against the allegations.

5.4 Disciplinary Action

If a violation is confirmed, disciplinary action will be taken against the perpetrator. This may include:

- Verbal or written warnings
- Suspension
- Termination of employment
- Legal reporting (if applicable)

False accusations made maliciously will also result in disciplinary action.

6. Gender-Based Violence and Harassment

Reve Diamonds DMCC recognizes that gender-based violence requires specific attention. Policies and procedures include:

- Ensuring the victim's confidentiality and safety

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- Taking immediate steps to prevent retaliation or further harm
- Providing gender-sensitive support services
- Applying strict disciplinary measures to confirmed perpetrators

7. Communication and Training

This policy and its procedures will be:

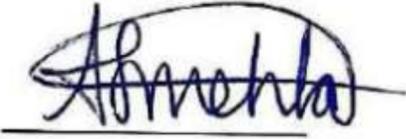
- Communicated to all employees upon hiring and when updates occur
- Included in the employee handbook

8. Review and Monitoring

The policy will be reviewed annually by HR and senior management to ensure it remains effective, compliant with local laws, and aligned with best practices.



Sapna Sachin Mehta
Managing Director



Arav Sachin Mehta
Executive Director



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REVE DIAMONDS DMCC

Unit No: AU-05-E, Gold Tower (AU), Plot No: JLT-PH1-I3A, Jumeirah Lakes Towers, Dubai, UAE
Phone: +97145852868; Email: sapna@revedmcc.com

Policy on Violence, Harassment and Abuse

1. Policy Statement

We are dedicated to maintaining a workplace free from all forms of violence, harassment, bullying, and abuse. We foster a culture of respect, dignity, and professionalism where every individual feels safe and valued.

2. Scope

This policy applies to all employees, contractors, visitors, and other individuals associated with Reve Diamonds DMCC, regardless of their role or level within the organization.

3. Definitions

- **Violence:** Physical force or threats that cause harm or discomfort.
- **Harassment:** Unwelcome conduct, verbal, physical, or visual, that creates a hostile or offensive work environment.
- **Abuse:** Emotional or psychological harm, including manipulation or coercion.

4. Prohibited Conduct

- **Sexual Harassment:** Any unwelcome sexual advances, comments, or gestures.
- **Bullying:** Repeated, unreasonable behaviour meant to intimidate, degrade, or humiliate someone.
- **Physical Violence:** Any form of physical assault or threat of violence.
- **Psychological Harassment:** Verbal abuse, intimidation, or behaviour that causes emotional distress.

5. Reporting Procedure

- Employees who experience or witness any violation of this policy should report it immediately to their supervisor, HR, or any designated authority.
- All reports will be handled confidentially and investigated thoroughly. Appropriate corrective actions will be taken in line with applicable laws.

6. Consequences of Violations

Violations may result in disciplinary action, including termination of employment or contract, and possible legal consequences as per UAE laws.

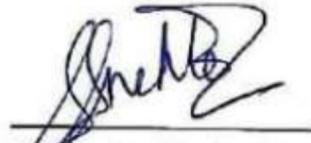
7. Support and Resources

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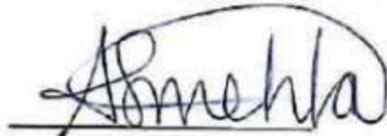
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- Confidential counselling and employee assistance programs will be available to individuals affected by violence, harassment, or abuse.
8. **Education and Awareness**
Regular training will be provided to employees to raise awareness of their rights and responsibilities under this policy, promoting a culture of respect and inclusion.
9. **Review and Continuous Improvement**
- This policy will be reviewed periodically to ensure its alignment with Federal Decree-Law No. 33 of 2021 and any other relevant UAE regulations, with amendments made as necessary.


Sapna Sachin Mehta
Managing Director




Arav Sachin Mehta
Executive Director

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Health and Safety Policy and Procedures

1. Policy Statement

At Reve Diamonds DMCC, we are committed to providing and maintaining a safe, healthy, and supportive working environment for all employees, contractors, and visitors. We aim to eliminate or minimize risks to health, safety, and welfare as far as is reasonably practicable, in accordance with relevant UAE labor laws and international best practices.

2. Scope

This policy applies to:

- All employees (permanent, temporary, and part-time)
- Contractors and service providers
- Visitors to our premises

3. Responsibilities

- **Senior Health and Safety Manager:**
Arav Mehta is appointed as the Senior Manager responsible for overseeing this policy.
- **All Employees:**
Each individual has a duty to take reasonable care of their own health and safety and that of others who may be affected by their actions.

4. General Conditions for a Safe and Healthy Workplace

- Maintain clean, hygienic workspaces, toilets, pantry, and common areas.
- Provide adequate lighting, ventilation, potable water and ergonomically safe furniture.
- Ensure secure storage of waste disposal.

5. Hazard Identification and Mitigation

- Conduct regular workplace risk assessments to identify potential hazards (e.g., fire hazards, electrical safety issues).
- Maintain a Hazard Register and update it after incidents, or changes in layout/processes.
- Implement risk mitigation measures such as signage and clear pathways.

6. Emergency Preparedness

- Ensure working fire alarms, smoke detectors, and fire extinguishers are maintained.
- Clearly display evacuation plans and emergency contacts.

7. First Aid and Medical Response

- A fully stocked **First Aid Kit** shall be available and regularly checked.
- Emergency contact numbers must be visibly displayed.

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8. Cleanliness and Hygiene

- Cleaning of all office spaces, especially toilets and eating areas, shall be carried out regularly.
- Hand sanitizers, tissues, and soap shall be available in common areas.
- Potable drinking water will be available constantly, and water filters will be replaced and serviced as required.
- Food items can be stored in fridge placed in the pantry.

9. Staff Engagement and Communication

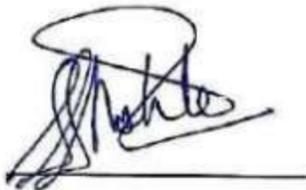
- Employees will be consulted on any safety-related changes that directly affect them.
- Feedback mechanisms (e.g., suggestion box or email to Arav Mehta) will be maintained for safety improvement ideas.
- Health and safety concerns can be raised anonymously.

10. Training and Awareness

- All new staff will receive induction training covering health and safety protocols.
- Ongoing annual safety refresher training will be mandatory for all staff.
- Specialized training (e.g., fire extinguisher use, evacuation procedures, manual handling) will be provided as needed.

11. Monitoring and Review

- This policy will be reviewed annually or upon significant change to operations or legislation.
- Incident reports, audit findings, and staff feedback will be used to improve health and safety performance.



Sapna Sachin Mehta
Managing Director



Arav Sachin Mehta
Executive Director



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Health and Safety Policy and Procedures

At Reve Diamonds DMCC, the health and safety of our employees, contractors, and visitors is our top priority. We are committed to providing a safe work environment by preventing accidents, injuries, and occupational illnesses.

Health and Safety Policy

1. Compliance

We comply with all relevant health and safety laws, regulations, and industry standards to ensure maximum protection for all stakeholders.

2. Risk Management

We conduct regular risk assessments to identify potential hazards, evaluate their risks, and implement control measures to minimize them. This includes preventive actions to eliminate or mitigate identified risks.

3. Training and Education

We provide ongoing health and safety training to all employees, ensuring they are equipped with the knowledge and skills to safely carry out their work and recognize potential risks.

4. Responsibility and Accountability

Clear roles and responsibilities for health and safety are assigned at every level of the organization. Employees, supervisors, and managers are held accountable for adhering to safety policies and procedures.

5. Communication

We foster open communication about safety concerns, encourage reporting of hazards or near misses, and involve employees in safety improvement initiatives.

6. Emergency Preparedness

We develop emergency response plans and conduct drills for various scenarios, ensuring employees are prepared for emergencies like fires, medical incidents, or chemical spills.

7. Continuous Improvement

We regularly review and assess our health and safety performance to identify areas for improvement. Our practices evolve in line with changes in health and safety regulations to ensure a culture of continuous improvement.

Health and Safety Procedures

1. Risk Assessment and Hazard Identification

Regularly assess and identify hazards in the workplace, documenting and prioritizing them based on risk level.

2. Safe Work Practices

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- Develop and communicate safe work procedures for all tasks.
 - Provide training on safe methods, proper equipment handling, and emergency protocols.
- 3. Emergency Preparedness and Response**
- Create emergency plans for various scenarios (e.g., fire, medical emergencies, chemical spills).
 - Conduct regular drills to ensure employees are familiar with evacuation procedures and emergency protocols.
- 4. Incident Reporting and Investigation**
- Establish clear procedures for reporting accidents, near misses, and hazards.
 - Investigate incidents promptly to identify root causes and implement corrective actions.
- 5. Training and Education**
- Provide comprehensive health and safety training to all employees, including contractors and temporary workers.
 - Focus on hazard recognition, safe work practices, and regulatory compliance.
- 6. Safety Inspections and Audits**
- Conduct regular inspections to identify potential safety hazards.
 - Track findings and ensure corrective actions are taken promptly.
- 7. Contractor Safety Management**
- Ensure that contractors adhere to health and safety standards while on company premises.
 - Conduct safety orientations and monitor contractor activities.
- 8. Documentation and Recordkeeping**
- Maintain accurate records of all health and safety activities, such as risk assessments, training, and incident reports.
 - Ensure records are up-to-date and accessible for review.
- 9. Communication and Consultation**

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- Encourage open communication with employees regarding safety matters.
- Foster employee participation in safety meetings and initiatives, and encourage them to raise concerns or report hazards.

10. Review and Continuous Improvement

- Regularly evaluate health and safety performance, policies, and procedures.
- Seek feedback from employees and stakeholders to identify areas for improvement and ensure ongoing compliance with regulatory changes.


Sapna Sachin Mehta
Managing Director


Arav Sachin Mehta
Executive Director



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Health and Safety Incident Investigation & Response Procedures

1. Purpose

To establish a consistent and effective process for reporting, investigating, documenting, and responding to health and safety incidents, including near-misses, to prevent recurrence and promote continuous improvement in workplace safety.

2. Scope

These procedures apply to all employees, contractors, and visitors at Reve Diamonds DMCC.

3. Definitions

- **Incident:** An unplanned event that results in or could have resulted in injury, illness, damage, or loss.
- **Near-Miss:** An unplanned event that did not result in injury or damage but had the potential to do so.

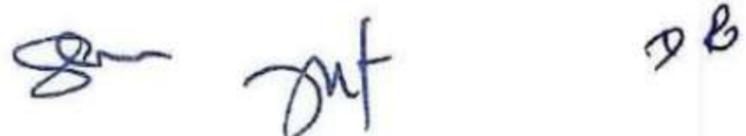
4. Responsibilities

Role	Responsibility
All Staff	Immediately report any incident or near-miss to the Health & Safety Manager.
Health & Safety Manager (Arav Mehta)	Lead investigations, document findings, recommend corrective actions, and maintain incident records.
Administrative Assistant (Janry Mitz Tenencia)	Assist with documentation, gathering statements, and follow-up.
Managing Director (Sapna Mehta)	Review investigation findings and approve corrective actions if needed.

5. Procedures

5.1 Immediate Response

1. Ensure the safety of all personnel involved—call emergency services if required.
2. Provide first aid where appropriate.
3. Secure the area to prevent further harm.

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4. Notify the Health & Safety Manager immediately.
-

5.2 Incident Reporting

1. Complete an **Incident Report Form** within 24 hours.
 2. Include details such as:
 - o Date/time and location
 - o Individuals involved
 - o Description of the incident
 - o Witness statements (if applicable)
 - o Photos or evidence, if available
-

5.3 Investigation Process

1. The Health & Safety Manager (with assistance from Janry) conducts an initial assessment within 48 hours.
 2. Identify:
 - o Root cause(s) of the incident
 - o Contributing factors (e.g. equipment, environment, human error)
 - o Safety procedures or controls that failed or were missing
 3. Evaluate potential consequences if the incident had escalated.
 4. Document findings using the **Incident Investigation Form**.
-

5.4 Corrective and Preventive Actions

1. Develop corrective actions to eliminate or reduce the hazard.
 2. Assign responsibility and timeline for implementation.
 3. Communicate outcomes and safety reminders to all staff.
 4. Update policies, risk assessments, or training as needed.
-

5.5 Follow-Up

1. Monitor that corrective actions are completed on schedule.
 2. Review effectiveness of actions taken.
 3. If applicable, re-inspect the area or process to confirm improvement.
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5.6 Serious Incidents

For serious or potentially reportable incidents (e.g., injury, fire, structural failure), the following also applies:

- Report to Dubai Civil Defence or other relevant authorities, if required.
- Notify building management.
- Prepare an internal incident briefing for senior management.

6. Recordkeeping

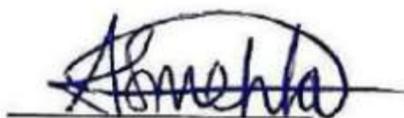
All incident reports and investigation documentation must be retained for at least 5 years. These records are confidential and reviewed periodically during internal audits.

7. Continuous Improvement

- All incidents and near-misses will be reviewed immediately in safety committee meetings.
- Trends and lessons learned will be used to inform training, emergency drills, and risk assessments.



Sapna Sachin Mehta
Managing Director



Arav Sachin Mehta
Executive Director



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Procedures for Handling Medical Emergencies and Transport

Objective:

To ensure the safety, well-being, and prompt medical attention for employees, contractors, or visitors who may experience medical emergencies while on the premises of Reve Diamonds DMCC.

1. Identifying Medical Emergencies:

A medical emergency refers to any situation where an individual experiences a sudden and serious medical condition that requires immediate attention. These include, but are not limited to:

- Cardiac arrest or heart attack
- Severe bleeding
- Burns
- Choking
- Fainting, dizziness, or loss of consciousness
- Respiratory distress or difficulty breathing
- Allergic reactions (e.g., anaphylaxis)
- Seizures

2. Immediate Actions for Responding to a Medical Emergency:

Step 1: Assess the Situation

- Quickly assess the situation to determine the severity of the emergency. Ensure your safety and the safety of others before approaching the affected individual.
- If the individual is unresponsive or in severe distress, immediately alert others for assistance.

Step 2: Alert the Health & Safety Manager (Arav Mehta)

- Notify Arav Mehta, the Health & Safety Manager, as he is responsible for coordinating medical emergencies. Arav will take charge of managing the situation and guiding any further actions.

Step 3: Call Emergency Services

- If the emergency is serious and requires immediate medical attention, dial **999** (UAE emergency services) to request an ambulance and inform them of the situation. Provide your location (Gold Tower, JLT, Dubai) and any details about the nature of the emergency.
 - **Police:** 999
 - **Ambulance:** 998
 - **Fire Department/Civil Defence:** 997

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Step 4: First Aid Response

- If trained and it is safe to do so, begin administering basic first aid (CPR, controlling bleeding, treating shock, etc.).
- **Arav Mehta** and **Janry Mitz Tenencia** have basic training in first aid and will lead any immediate first aid interventions.

3. Transport Arrangements:

Step 1: Arrange for Safe Transport

- **If the individual is stable** and requires transport to a medical facility, Arav or Janry will arrange for transport via an emergency vehicle (ambulance) or a private vehicle, depending on the severity of the condition.
- **If the individual is in critical condition**, an ambulance will be dispatched by the emergency services, and they will be transported to the nearest medical facility

Step 2: Provide Escort and Support

- If necessary, one or more employees (preferably Arav or Janry) will accompany the affected individual to the hospital to provide support and communication with emergency responders.
- Ensure the individual's personal details and emergency contact information are available for the medical team.

4. Post-Emergency Actions:

Step 1: Incident Reporting

- After the emergency is handled, Arav will document the incident in the company's **Health & Safety Incident Log**, including:
 - Date, time, and nature of the medical emergency
 - Actions taken (first aid administered, transportation arrangements)
 - Any follow-up actions or recommendations

Step 2: Medical Review

- After any significant medical emergency, the affected employee should undergo a **medical review** to assess their health condition.
- The company may recommend the employee visit a healthcare provider for follow-up care, if applicable.

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Step 3: Post-Incident Review

- Arav, in collaboration with the affected employee (if they are available), will review the event and identify any improvements to the current procedures.
- If required, modifications will be made to enhance future medical emergency responses.

5. Employee Wellness & Preventive Measures:

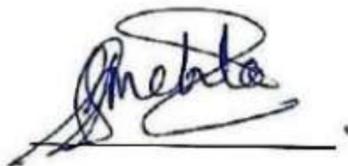
- **Regular Health & Safety Drills:** Organize drills and training on how to handle medical emergencies, including transport arrangements.
- **First Aid Kit:** Regularly inspect and replenish the first aid kit to ensure it is adequately stocked for handling common medical emergencies (bandages, antiseptics, gloves, etc.).

6. Emergency Contact Information:

- **Arav Mehta (Health & Safety Manager):** +971509247947
- **Janry Mitz Tenencia (H&S Support):** +971586936546
- **Emergency Medical Services:**
 - **Ambulance:** 998
 - **Fire & Rescue:** 997
 - **Police:** 999
- **Nearest Medical Facility:** Mediclinic, Jumeirah Lake Towers

Conclusion:

By following these procedures, Reve Diamonds DMCC ensures a quick and effective response to medical emergencies. The safety and health of our employees, contractors, and visitors are of the utmost importance, and these procedures will help mitigate risks and provide the necessary support when needed.



Sapna Sachin Mehta
Managing Director



Arav Sachin Mehta
Executive Director



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Procedures for Handling Fire Emergencies

Objective:

To ensure the safety and orderly evacuation of all personnel in the event of a fire emergency at Reve Diamonds DMCC.

1. Fire Emergency Response Plan:

1.1 Fire Detection and Alarm:

- In the event of a fire or detection of smoke, activate the nearest fire alarm pull station immediately.
- If equipped, activate the building's fire alarm system using the nearest pull station or alarm panel.

1.2 Emergency Hotlines and Numbers:

- Call the Gold Tower emergency number at **04-422 6023** to report the fire emergency within the building.
- Simultaneously, dial the appropriate emergency hotline:
 - Police: **999**
 - Ambulance: **998**
 - Fire Department/Civil Defence: **997**

1.3 Evacuation Procedure:

- Upon hearing the fire alarm or receiving notification of a fire emergency, all personnel must evacuate the building immediately.
- Follow the nearest designated evacuation route to exit the building safely.
- Do not use elevators during a fire emergency; use stairwells instead.
- Assist colleagues with disabilities or mobility limitations in evacuating the premises, if safe to do so.

1.4 Assembly Point:

- Proceed to the designated assembly point located outside the building.
- Remain at the assembly point until further instructions are provided by emergency responders or building management.

1.5 Firefighting Equipment:

- If trained and it is safe to do so, use portable fire extinguishers to combat small fires.
- Do not attempt to extinguish large fires that pose a risk to personal safety.

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2. Emergency Evacuation Drills:

- Participate in all building evacuation drills to familiarize all personnel with evacuation procedures and assembly points.
- Drill schedules will be coordinated with building management

3. Communication and Coordination:

- Notify relevant supervisors or managers of your status and whereabouts.
- The Health and Safety Manager will be responsible for coordinating evacuation efforts and ensuring all personnel are accounted for.

4. Post-Evacuation Procedure:

- After evacuating the building, do not re-enter until authorized by emergency responders or building management.
- Follow instructions provided by emergency services personnel and cooperate fully during the investigation and clearance process.

5. Training and Awareness:

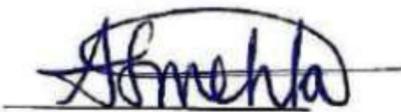
- All personnel will receive training on fire emergency procedures, including evacuation routes, alarm signals, and the use of firefighting equipment.
- Regular awareness campaigns will be conducted to reinforce fire safety practices and emergency response protocols.

6. Review and Revisions:

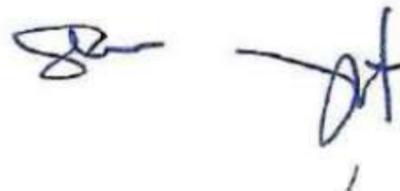
- These fire emergency and evacuation procedures will be reviewed periodically to ensure compliance with regulatory requirements and best practices.
- Feedback from emergency drills, incidents, and near-misses will be used to update and improve the effectiveness of the procedures.



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Security Policies and Procedures

Policy Statement

Reve Diamonds DMCC is committed to maintaining the highest level of security for its products, staff, and facilities. We acknowledge the value of our employees above all else.

General Procedures

- No product, however valuable, is worth more than the health and safety of our people.
- Access to the diamond vault is restricted to authorized personnel only.
- All inventory must be kept in secure vault unless directly required (for shipments, memo preparation, stock check, etc.).
- Diamonds must never be left unattended outside secure areas.
- Employees must report any suspicious activity immediately to the Security Officer.

Theft Detection and Prevention

- Use of high-definition CCTV (24/7 recording) covering all entry/exit points and storage.
- All staff trained to detect unusual behavior or discrepancies.
- Daily inventory reconciliation by trained and experienced experts.
- All visitors must be logged and never be left unattended. Diamonds will not be kept in their vicinity unless they are a customer, and this will also only be done in a limited manner (no more than three diamonds to be shown at one time).

Damage Prevention

- Every diamond will be put in a cushion for protection, which goes inside the parcel paper. This is to ensure that the stone is not damaged in transit.
- Use secure couriers experienced with high-value shipments as much as possible.

Substitution Prevention

- Every diamond will be subject to the following procedures when entering or exiting the office:
 - Screening in Yehuda Watson machine to verify natural
 - Carat weight check on scale
 - Manual inscription check to verify that the diamond remains the same, as well as a quick check of the color and clarity of the diamond.
- Entire inventory must be reconciled on a daily basis.
- We will only give shipments to secure couriers after documenting seal number, and sealing must be done in our presence only to ensure no tampering.

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REVE DIAMONDS DMCC

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Exhibition Protocol

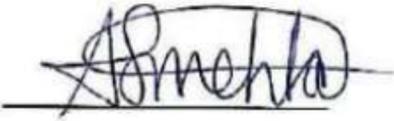
- Inventory to be transported securely with armed courier service, and extra exhibition insurance to be taken.
- Booths must include:
 - Lockable showcases
 - Motion detectors, alarm systems and CCTV.
 - Panic button for emergencies when possible.
- Staff to receive pre-event security training.
- Schedule regular checks throughout the day and detailed reconciliation at the close of each day.

Shipping Security

- All diamonds to be shipped using approved, secure logistics providers with tracking and insurance.
- Shipping records retained for a minimum of 12 months.



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Executive Director

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Regular Inspection and Maintenance Procedures

Objective:

To ensure the safety, security, and functionality of the workplace environment at Reve Diamonds DMCC through regular inspections and maintenance activities.

1. Schedule and Frequency:

- Inspections will be conducted regularly to assess the condition of workplace facilities and equipment.
- The schedule for inspections will be coordinated with the respective inspection teams: Fast Vision Security LLC (for alarm system and CCTV system), Safety First Safety Systems LLC (for fire extinguishers), Gold Tower Management provided Eurofire Fire and Safety LLC (for smoke detectors and alarm system), and Aqua Guard Insulation Contracting LLC (for potable water).
- Any urgent issues or concerns identified during routine operations will be reported immediately for prompt attention and resolution.

2. Inspection Teams Responsibilities:

- **Fast Vision Security LLC:**
 - Conduct regular inspections of the alarm system and CCTV system.
 - Verify the functionality of surveillance cameras, recording equipment, and alarm systems.
 - Identify any faults or malfunctions and provide recommendations for repairs or upgrades.
 - Submit detailed inspection reports to Reve Diamonds DMCC upon completion.
- **Safety First Safety Systems LLC:**
 - Perform inspections of fire extinguishers according to regulatory standards.
 - Conduct visual checks and pressure tests to ensure fire extinguishers are in proper working condition.
 - Maintain accurate records of inspection dates, findings, and any maintenance performed.
 - Provide recommendations for replacement or refilling of fire extinguishers when necessary.
- **Gold Tower Management provided Eurofire Fire and Safety LLC:**
 - Collaborate to inspect smoke detectors and the overall alarm system.
 - Test the functionality of smoke detectors, sirens, and alarm panels.
 - Ensure proper integration with the central monitoring system and emergency response protocols.

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- Coordinate any repairs or upgrades needed to maintain compliance and effectiveness.
 - **Aqua Guard Insulation Contracting LLC:**
 - Inspect potable water systems for leaks, contamination, or other issues affecting water quality.
 - Conduct tests to assess water pressure, temperature, and purity.
 - Implement preventive maintenance measures to prevent plumbing failures or waterborne hazards.
 - Provide recommendations for improvements in water system infrastructure if necessary.
- 3. Follow-up and Continuous Improvement:**
- Feedback from employees regarding workplace safety and functionality will be encouraged and integrated into the inspection and maintenance processes.
 - Continuous improvement initiatives will be implemented to enhance the effectiveness and efficiency of workplace inspections and maintenance activities.
- 4. Emergency Procedures:**
- In the event of an emergency such as a fire, security breach, or water system failure, designated emergency response protocols will be activated.
 - Employees will be trained on emergency procedures and evacuation routes to ensure a prompt and orderly response to any crisis situation.
 - Inspection teams will provide support and assistance as needed during emergency situations to mitigate risks and minimize disruption to operations.

Conclusion:

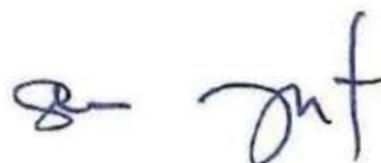
By adhering to these procedures for regular inspection and maintenance of the workplace, Reve Diamonds DMCC aims to uphold the highest standards of safety, security, and operational excellence for the benefit of its employees, clients, and stakeholders.



Sapna Sachin Mehta
Managing Director



Arav Sachin Mehta
Executive Director



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REVE DIAMONDS DMCC

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Visitor Policies & Procedures

Applies To: All visitors, external contractors, and service providers undertaking work at Reve Diamonds DMCC.

1. Purpose

The purpose of this document is to outline the safety and conduct procedures all visitors must follow when visiting the Reve Diamonds DMCC premises. This ensures the safety and wellbeing of you and our employees.

2. General Safety Policy

- All visitors must comply with relevant UAE health and safety regulations at all times.
- Contractors are responsible for ensuring that their tools, equipment, and practices do not pose a risk to others.
- Any hazards identified on site must be reported to the Office Manager or designated representative immediately.
- Smoking, alcohol, and drug use are strictly prohibited on the premises.

3. Office Conduct & Etiquette

- Contractors and visitors are to behave professionally and respectfully toward all Reve Diamonds staff.
- Work areas must be kept clean, tidy, and free of obstructions.
- Loud or disruptive work must be scheduled in advance and approved by the Office Manager.
- Contractors may only access areas necessary for their work. All other areas are off-limits unless authorized.

4. Hours of Work & Access

- Contractors must work during approved hours: 9:30 AM – 5:00 PM.
- All contractors must sign in and out at reception each day.
- Identification must be presented upon arrival and worn at all times while on site.

5. Fire Safety & Emergency Procedures

- Contractors must familiarize themselves with emergency exits, fire extinguisher locations, and evacuation procedures upon arrival.
- In the event of an alarm, contractors must evacuate immediately and follow the instructions of the emergency coordinator.

6. Confidentiality & Security

- Visitors may be exposed to confidential business operations. All information must be treated as confidential and not shared or discussed externally.
- No photographs or recordings may be taken without prior written consent from management.

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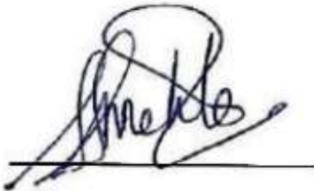
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7. Incident Reporting

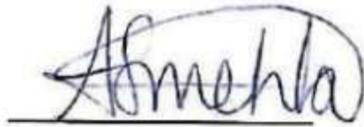
- Any injury, accident, near-miss, or damage to property must be reported immediately to the Office Manager.
- A formal incident report may be required depending on the severity.

8. Acknowledgement

All visitors must read, understand, and acknowledge this document before commencing any work on the premises.



Sapna Sachin Mehta
Managing Director



Arav Sachin Mehta
Executive Director



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Equal Employment Opportunity & Non-Discrimination Policy

Reve Diamonds DMCC is committed to equal opportunity in employment. We promote diversity, fairness, and inclusion, ensuring all employees and applicants are treated with dignity and respect.

1. Commitment to Equal Opportunity

- We provide equal employment opportunities to all individuals who are fit to work, without discrimination based on race, color, religion, gender, sexual orientation, gender identity, national origin, age, disability, marital status, or any other factor unrelated to a person's ability to perform their job.
- Our goal is to create a workplace where every individual feels valued, respected, and empowered.

2. Non-Discrimination

- We do not discriminate against any employee or applicant on the basis of personal or demographic characteristics unrelated to job performance or business needs.
- All employment-related decisions – including recruitment, promotion, training, compensation, and termination – are based strictly on merit, qualifications, and performance.
- We prohibit harassment, retaliation, or any form of discriminatory practice within our workplace. All concerns will be addressed promptly, fairly and confidentially.

3. Recruitment and Hiring

- Recruitment and hiring decisions are made on individual qualifications, relevant experience, and the ability to perform the essential functions of the job.
- We actively encourage applications from a diverse range of candidates and aim to ensure that every selection process is fair, objective and inclusive.

4. Compensation and Benefits

Compensation and benefits are determined by job responsibilities, performance, qualifications and experience – never on the basis of personal characteristics or background.

5. Training and Career Development

- Equal access to training, career development, and advancement is available to all employees.

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- We are committed to nurturing talent and providing a level playing field for every team member's growth.

6. Workplace Environment

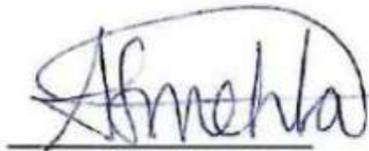
- We are dedicating to maintaining a discrimination-free, respectful, and inclusive work environment.
- Employees are encouraged to report incidents of discrimination or harassment without fear of retaliation, which will be handled swiftly and confidentially.

Conclusion

By promoting diversity and inclusion, Reve Diamonds DMCC fosters a stronger, more innovative, and equitable organization. Our commitment to equal employment opportunities enhances our workplace for the benefit of all employees, customers, and stakeholders.



Sapna Sachin Mehta
Managing Director



Arav Sachin Mehta
Executive Director



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HR Procedures for Hiring & Firing

1. Hiring Procedure

Objective:

To ensure a transparent, fair, and compliant recruitment process that attracts qualified candidates aligned with the company's values and operational needs.

Steps:

1. **Requisition & Approval**
 - Department Head submits hiring request with job description and justification.
 - Executive Director or HR Manager approves the request.
2. **Job Posting & Sourcing**
 - Executive Director / HR reaches out to their network to find possible leads
 - Priority given to internal referrals and diversity.
3. **Screening & Shortlisting**
 - HR screens CVs and shortlists candidates based on qualifications and experience.
4. **Interviews**
 - At least one round of interviews:
 - **Round 1:** Technical/skills/culture fit with HR or Executive Director
5. **Reference Checks**
 - Minimum of two references checked (former manager or HR where applicable).
6. **Offer & Documentation**
 - Offer letter issued with job title, salary, start date, and benefits.
 - Employee must submit:
 - Passport copy
 - Emirates ID (if available)
 - Visa/Work permit (if applicable)
 - Academic/professional certificates (if applicable)
7. **Onboarding**
 - Employee is taken through employment contract with all terms and conditions, and is hired.
 - Employee receives Employee Handbook and goes through and signs all company policies and procedures.

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2. Termination Procedure

Objective:

To manage employment terminations fairly, legally, and respectfully, whether voluntary or involuntary.

Types:

- Resignation
- Termination for Cause
- Redundancy

Steps:

1. Initiation

- **Voluntary:** Employee submits signed resignation with notice period.
- **Involuntary:** Manager submits termination request with supporting documentation.

2. Review & Approval

- HR and Executive Director review justification (if involuntary) and assess risks/legal requirements.
- Termination decision must comply with UAE Labor Law.

3. Final Settlement Calculation

- HR calculates:
 - End of service benefits (gratuity)
 - Unused leave
 - Final salary
 - Deductions (if any)

4. Documentation

- HR provides service certificate and any necessary legal clearance documents.
- Final payment processed within 14 days of termination.

3. Performance Review Procedure

Objective:

To support employee growth, assess achievements, and align performance with business objectives.

Frequency:

- Annual review (Q4)
- Mid-year check-in (Q2)

Steps:

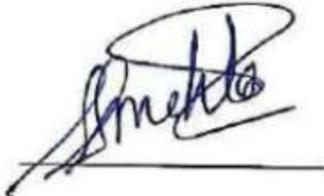
1. Employee Self-Evaluation

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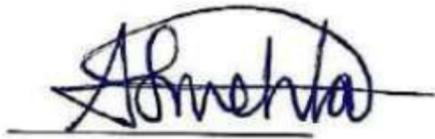
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- Employees come prepared with a self-review prior to discussion
- 2. **Review Meeting**
 - One-on-one discussion with manager and employee.
 - Cover strengths, areas for improvement, and goals for next cycle.
- 3. **Action Planning**
 - Set development goals, training needs, and stretch assignments.



Sapna Sachin Mehta
Managing Director



Arav Sachin Mehta
Executive Director



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Working Hours, Overtime, and Ramadan Working Hours Policy

Reve Diamonds DMCC is committed to ensuring compliance with UAE labor regulations while fostering a balanced and productive work environment for all employees.

1. **Standard Working Hours**

- Employees must work 8 hours a day, 40 hours per week, across 5 days.
- Some sectors or worker categories may have different hours as outlined by UAE Labour Law.
- Commuting time is not counted as working hours, except for specific categories of workers.
- Employees working for more than one employer cannot exceed agreed working hours unless mutually agreed in writing.

2. **Working Remotely**

Employees wishing to work remotely, whether inside or outside the UAE, must agree with their employer on specific working hours.

3. **Breaks**

Employees are entitled to breaks if working 5 consecutive hours. Breaks must total at least one hour and are not included in working hours.

4. **Overtime**

- Overtime may be requested by the employer, with a maximum of 2 hours per day.
- Employees are entitled to 25% additional pay for overtime hours.
- Overtime worked between 10 pm and 4 am is compensated with 50% extra pay.
- Shift workers are not subject to these overtime rules.
- Working on a designated rest day entitles employees to either a substitute rest day or 50% additional pay.

5. **Ramadan Working Hours**

During Ramadan, working hours are reduced by two hours per day to accommodate fasting employees.

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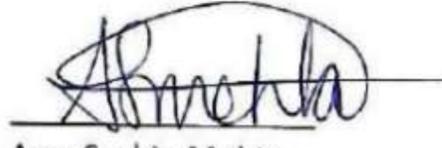
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6. Compliance

All employees must adhere to this policy. Any deviations require prior approval from relevant authorities within Reve Diamonds DMCC.


Sapna Sachin Mehta
Managing Director


Arav Sachin Mehta
Executive Director





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Working Overtime Policy

1. Purpose

This policy outlines the company's position and procedures regarding overtime work, in compliance with the UAE Labor Law and our commitment to ethical labor practices.

2. Scope

This policy applies to all employees of Reve Diamonds DMCC, regardless of job function or level, unless otherwise stated in their employment contract.

3. Voluntary Nature of Overtime

- Overtime work at Reve Diamonds DMCC is strictly **voluntary**.
- No employee shall be **required** to work overtime against their will.
- Employees are free to **refuse** overtime work without fear of punishment, retaliation, or negative consequences, including but not limited to:
 - Disciplinary action
 - Demotion or denial of promotion
 - Reduction in work hours
 - Termination or non-renewal of contract

4. Overtime Requests

- Overtime may be requested by a manager or supervisor based on business needs.
- Employees may accept or decline such requests without the need to justify their refusal.
- Acceptance of overtime shall be documented through written or electronic confirmation.

5. Compensation for Overtime

- When overtime is worked, it shall be **compensated in accordance with UAE Labor Law** and employee contracts.

6. Record Keeping

- All overtime hours worked will be accurately recorded and monitored by the HR department.
- These records will be used solely for payroll and compliance purposes.

7. Grievances

- Employees may raise concerns or complaints related to overtime work—or for any other reason—through the company's **grievance mechanism**.
- All grievances will be treated with seriousness, confidentiality, and without retaliation.
- Information on how to submit a grievance is available in the company's Employee Handbook or from the HR department.

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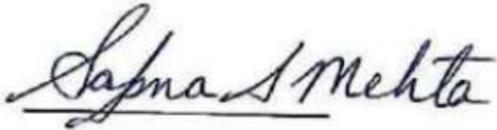
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8. Ethical Commitment

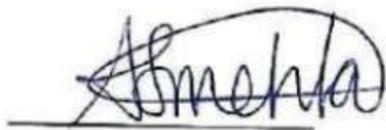
Reve Diamonds DMCC is committed to upholding the dignity and rights of all its employees. This includes ensuring that working conditions are fair, safe, and respectful of personal time and family life.

9. Policy Review

This policy will be reviewed periodically and may be amended in line with changes to UAE labor laws or company practices.



Sapna Sachin Mehta
Managing Director



Arav Sachin Mehta
Executive Director



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Annual Leave Policy

1. Purpose

This policy outlines the entitlements and procedures related to annual leave for employees of Reve Diamonds DMCC, in compliance with the UAE Labor Law and the company's commitment to employee well-being and fair labor practices.

2. Scope

This policy applies to all full-time employees of Reve Diamonds DMCC.

3. Annual Leave Entitlement

- Employees who have completed **one year of continuous service** are entitled to **30 calendar days of paid annual leave** per year, in accordance with UAE Labor Law.
- For employees with **less than one year of service**, leave will be calculated on a pro-rata basis.

4. Leave Accrual and Usage

- Leave accrues monthly and can be taken only upon completion of the probation period unless otherwise approved by management.
- Employees are encouraged to utilize their annual leave entitlement to rest and recharge.
- Leave must be taken at times mutually agreed upon between the employee and management, based on business needs.

5. Unused Leave

- If an employee **chooses** not to take their full 30 calendar days of annual leave in a given year, they shall be entitled to:
 - A **13th-month salary**, equivalent to one month of basic pay, to be paid at the end of the leave cycle.
 - This payment will be considered in lieu of the untaken annual leave.
- This is a completely voluntary option, and will never be asked of by management.

6. Flight Ticket Benefit

- In recognition of the needs of expatriate employees, **Reve Diamonds DMCC will provide a round-trip economy class flight ticket** to the employee's home country **once every two years** of continuous service.
- The ticket is for the employee only and must be used within 12 months of eligibility.
- Flight booking and travel dates must be coordinated with the HR department.

7. Leave Application Procedure

- Employees must submit a leave request to the company's HR department at least **30 days in advance**, unless otherwise approved.
- Approval is subject to operational requirements but will not be unreasonably withheld.

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8. Leave Pay

- During annual leave, employees will be paid their **basic salary and any applicable allowances**, as per their employment contract.
- Payment for annual leave will be made **prior to the start of the leave period**, where feasible.

9. Carry Forward of Leave

- As per UAE Labor Law, annual leave should be taken in the year it is due.
- In exceptional cases, a maximum of **one year's leave may be carried forward** with prior approval from management.
- Any unused leave beyond this period may be forfeited unless otherwise agreed.

10. Grievance Mechanism

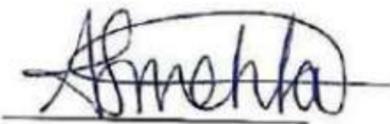
- Employees who have any concerns or disputes regarding their annual leave entitlements may raise the issue through the company's **grievance mechanism**, which ensures confidentiality, fairness, and protection from retaliation.

11. Policy Review

This policy is subject to periodic review and may be amended to reflect changes in the UAE Labor Law or company practices.



Sapna Sachin Mehta
Managing Director



Arav Sachin Mehta
Executive Director



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Unit No: AU-05-E, Gold Tower (AU), Plot No: JLT-PH1-I3A, Jumeirah Lakes Towers, Dubai, UAE
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Employee Loan Policy

General Principles

1. Interest-Free Loans:

Employers are permitted to offer loans to employees; however, these loans must be interest-free. Charging interest on loans between natural persons is considered a criminal offense under Article 458 of Federal Law Decree No. (31) of 2021.

2. Salary Deduction Limits:

Repayment of loans through salary deductions is allowed, but deductions must not exceed 20% of the employee's wage per month. This requires the employee's written consent.

3. Written Agreement:

A formal loan agreement must be signed by both parties, detailing the loan amount, repayment terms, and conditions. This agreement should be retained in the employee's records.

4. Repayment Term:

The loan repayment period should not extend beyond the duration of the employee's contract.

Purpose:

To establish a clear procedure for employees requesting loans or wage advances, ensuring compliance with UAE labor laws and promoting fair treatment.

Scope:

This policy applies to all employees of Reve Diamonds DMCC.

Policy Statement:

Reve Diamonds DMCC may, at its discretion, provide interest-free loans or wage advances to employees facing financial hardship, subject to the following conditions:

1. Eligibility:

- Employees must have completed 6 months of continuous service.
- The request must be for a legitimate financial need (e.g., medical emergencies, family obligations).

2. Application Process:

- Employees must submit a written request to Human Resources, stating the amount requested and the reason.
- The request will be reviewed, and a decision will be communicated within 5 working days.

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3. Loan Agreement:

- Upon approval, a formal loan agreement will be drafted, outlining:
 - Loan amount
 - Repayment schedule
 - Monthly deduction amount (not exceeding 20% of salary)
 - Repayment period (not extending beyond the employment contract)
 - Terms in case of early termination of employment
- Both the employee and an authorized company representative must sign the agreement.

4. Repayment:

- Repayments will be deducted from the employee's monthly salary, as per the agreed schedule.
- In case of resignation or termination, any outstanding loan amount will be deducted from the final settlement.

5. Record Keeping:

- All loan agreements and related documents will be maintained in the employee's personnel file.

6. Confidentiality:

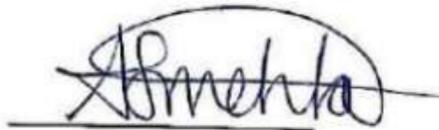
- All loan requests and agreements will be handled confidentially.

7. Exceptions:

- Any exceptions to this policy must be approved by the Managing Director.



Sapna Sachin Mehta
Managing Director



Arav Sachin Mehta
Executive Director



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Support for Employee Representation and Welfare

Reve Diamonds DMCC is committed to fostering a transparent, fair, and inclusive working environment that respects the rights and well-being of all employees. While formal trade unions are not permitted in the United Arab Emirates, we recognize the importance of employee representation and dialogue in ensuring a motivated and engaged workforce.

1. Employee Welfare Committee

We will establish a voluntary, representative Employee Welfare Committee. This body will:

- Act as a liaison between management and employees.
- Collect and relay employee feedback on workplace conditions, policies, and welfare.
- Suggest and collaborate on company initiatives related to employee well-being.

2. Open-Door Policy

All team members are encouraged to communicate directly with management regarding any workplace concerns, ideas, or suggestions. We commit to:

- Listening openly and respectfully to all feedback.
- Responding transparently and constructively.
- Maintaining confidentiality where required.

3. Grievance Mechanism

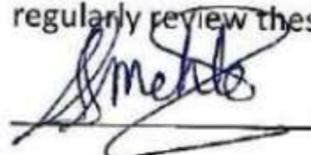
To ensure all voices are heard, we will maintain a grievance channel. This allows employees to safely share concerns, which will be reviewed regularly by the senior management team.

4. Support for External Networks

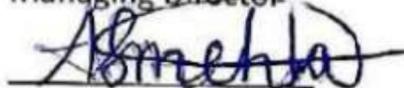
We encourage and support employees in their participation in professional associations, industry forums, and training programs that promote worker rights, knowledge-sharing, and career development, all while following local laws and regulations.

Commitment to Continuous Improvement

We recognize that a respectful and responsive workplace is a dynamic commitment. We will regularly review these mechanisms to ensure they remain effective and meaningful for our team.



Sapna Sachin Mehta
Managing Director



Arav Sachin Mehta
Executive Director



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Environmental Management Policy

1. Purpose

Reve Diamonds DMCC is committed to conducting its operations in an environmentally responsible manner, despite the limited scale of our operations. This policy outlines our approach to minimizing environmental impact, using resources efficiently, and promoting sustainability in our workplace.

2. Scope

This policy applies to all employees, contractors, and visitors in our Dubai office and encompasses everyday office operations including the use of energy, water, paper, and other consumables.

3. Responsibility

Arav Mehta, as part of his duties as Health & Safety Manager, is also appointed as the **Environmental Management Officer**. He is responsible for overseeing the implementation, monitoring, and review of this policy.

4. Policy Objectives

We aim to:

- **Reduce unnecessary consumption** of electricity, water, and other utilities.
- **Encourage responsible waste disposal**, including recycling and minimization of single-use items.
- **Educate and engage staff** on sustainable office practices.
- **Comply with applicable UAE environmental laws and building regulations.**
- **Apply principles of "reduce, recover, reuse and recycle"** to all our business practices.

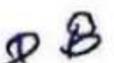
5. Key Environmental Commitments

5.1 Energy Efficiency

- Turn off lights, computers, air conditioners, and appliances when not in use, especially outside working hours.
- Monitor and review monthly DEWA bills to track consumption trends and improvements.

5.2 Water Conservation

- Ensure all taps and fixtures are leak-free and functioning efficiently.
- Use water mindfully in pantry, washrooms, and cleaning.
- Educate staff on water-saving habits.
- Make use of water filtration system for drinking water to reduce need for single use plastic water bottles



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5.3 Waste Reduction and Recycling

- Separate paper, plastics, and general waste where possible.
- Encourage digital documentation over printing.
- Reuse envelopes, folders, and other office supplies where feasible.

5.4 Paper and Printing

- Only print when necessary.
- Promote electronic communications and documentation for internal and external use.

5.5 Purchasing and Supplies

- Avoid unnecessary purchases and ensure responsible use of materials.

5.6 Air Quality and Cleanliness

- Ensure cleaning products used are non-toxic and environmentally safe where available.
- Maintain air conditioning units in good working order to ensure healthy indoor air quality.

6. Staff Involvement

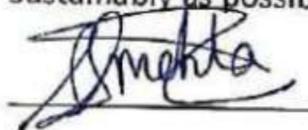
- Employees will be made aware of this policy at onboarding and via regular communications.
- Staff are encouraged to suggest environmentally conscious ideas and improvements.
- Periodic meetings will include environmental matters as a standing agenda item.

7. Monitoring and Review

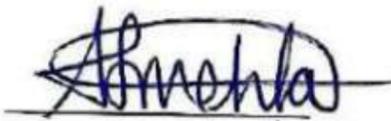
- Arav Mehta will conduct regular reviews of utility usage, waste generation, and more.
- Any incidents of environmental concern will be logged and investigated.
- The policy will be reviewed annually or in response to significant changes in operations.

8. Continuous Improvement

Reve Diamonds DMCC is committed to making small, practical steps toward improving its environmental impact. Through awareness, efficiency, and responsibility, we aim to operate as sustainably as possible within our scope.



Sapna Sachin Mehta
Managing Director



Arav Sachin Mehta
Executive Director



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REVE DIAMONDS DMCC

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Waste and Emission Management Policy & Procedures

1. Purpose

This policy outlines how Reve Diamonds DMCC identifies, monitors, and controls any waste generation or emissions to air, water, or land from its business activities. While our office operations have a low environmental footprint, we are committed to responsible environmental management and continual improvement.

2. Scope

This policy applies to all office operations at Reve Diamonds DMCC. It also applies to all employees, contractors, and visitors.

3. Policy Statement

Reve Diamonds DMCC is committed to:

- Identifying all sources of waste and emissions within our operations;
 - Monitoring the nature and quantity of such wastes or emissions;
 - Controlling or reducing these to the lowest practical level;
 - Ensuring proper storage, handling, and environmentally responsible disposal;
 - Complying with all relevant UAE environmental regulations and international good practices.
-

4. Definitions

- **Waste:** Any material no longer required for its original purpose and discarded.
 - **Emission:** The release of substances into the air, water, or land.
 - **Significant Waste/Emission:** One that has environmental risk due to its nature, volume, frequency, or regulatory impact.
-

5. Responsibilities

- **Arav Mehta (HSE Manager):** Implement this policy, maintain records, ensure compliance, and lead monitoring efforts.
 - **Janry Mitz Tenencia (Admin):** Assist in maintaining records and ensuring compliance.
 - **All Staff:** Follow procedures and report any unusual waste generation or emissions.
-

Arav Mehta

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6. Procedures

6.1 Identification

Sources of Waste and Emissions:

- **Air:**
 - Toner dust during printer maintenance
- **Water:**
 - Disposal of mop water containing cleaning chemicals
- **Land:**
 - Used printer cartridges
 - Expired batteries
 - Broken electronics
 - Expired cleaning agents

Inspections will be carried out by the HSE Manager and Admin Assistant to identify any new sources.

6.2 Monitoring

- Maintain a **Waste & Emissions Log** recording:
 - Types and quantities of toner, batteries, and chemicals discarded.
 - Quantity of cleaning materials used.
 - Instances of water discharge with chemical content.
- All staff are encouraged to report unusual waste levels or smells (suggestive of emissions).
- Check expiry dates of all chemicals quarterly.

6.3 Control Measures

- **Substitution:** Replace hazardous or high-impact products with safer alternatives when possible.
- **Minimisation:** Order only required quantities of chemicals to avoid expiry-related disposal.
- **Safe Storage:** Store substances in clearly labeled, original containers, away from heat or food.
- **Responsible Disposal:**
 - Toner and batteries to be discarded separately.
 - Expired or unused chemicals not to be poured down drains.
- **Spill Response:** Immediate isolation, ventilation, and appropriate clean-up.

6.4 Training

- All employees receive **basic environmental awareness training** on waste segregation, safe disposal, and emissions control.
- Training records are maintained.

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REVE DIAMONDS DMCC

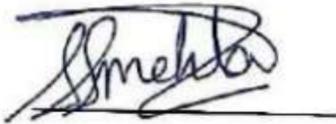
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7. Records and Documentation

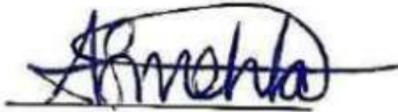
- Waste and Emissions Monitoring Log (maintained by Admin)

8. Review

This policy and its procedures will be reviewed annually or upon any significant change in operations, applicable legislation, or after an environmental incident.



Sapna Sachin Mehta
Managing Director



Arav Sachin Mehta
Executive Director



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Hazardous Substances Policy & Procedures

1. Purpose

To ensure the safe identification, use, handling, storage, and disposal of any hazardous substances that may be present or used at Reve Diamonds DMCC, even in minimal quantities (e.g. cleaning agents, printer toner, etc.), in compliance with UAE regulations and international best practices.

2. Scope

This policy applies to all employees, contractors, and visitors at Reve Diamonds DMCC. It covers all substances that pose a potential risk to health, safety, or the environment, however minor.

3. Policy Statement

Reve Diamonds DMCC is committed to maintaining a safe and healthy work environment by:

- Eliminating the use of any chemicals banned under UAE law or international safety standards.
 - Minimizing the use of hazardous substances wherever possible;
 - Ensuring appropriate storage and labeling;
 - Providing training and protective equipment where needed;
 - Disposing of such substances responsibly;
 - Maintaining up-to-date records and safety data sheets (SDS).
-

4. Examples of Hazardous Substances at Reve Diamonds DMCC

- General-purpose cleaning sprays and disinfectants
 - Printer toner and ink cartridges
 - Batteries (including lithium cells)
-

5. Responsibilities

- **Arav Mehta (H&S Manager):** Ensure implementation of this policy, maintain SDS, ensure no banned chemicals are purchased or stored, coordinate safe disposal.
 - **Janry Mitz Tenencia (Admin):** Assist with record keeping and safe storage practices.
 - **All Staff:** Follow instructions and report any incidents or exposure.
-

Arav Mehta *Janry Mitz Tenencia*

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6. Procedures

6.1 Identification and Labelling

- All chemical products must be checked for UAE compliance and must not be listed on any banned substance list.
- All chemicals or products with warning symbols or hazard markings must be flagged.

6.2 Storage

- Store in original containers, with labels intact, in a secure area away from food and electrical equipment.
- Flammable or reactive products must be kept in cool, ventilated areas.

6.3 Usage

- Staff must follow the manufacturer's guidelines.
- Use the minimum quantity needed for the task.

6.4 Handling

- Avoid direct skin or eye contact.
- Never mix chemicals unless specified as safe.
- Wash hands thoroughly after use.

6.5 Disposal

- Do not pour hazardous substances down drains or bins.
- Return used printer cartridges, batteries, or expired chemicals to the designated e-waste collection point (admin team coordinates).
- Cleaning agents past their expiry date must be disposed of according to local waste regulations.

6.6 Emergency Response

- In case of accidental exposure or spillage:
 - Evacuate the area if fumes are present.
 - Administer first aid and seek medical help where needed.
 - Report to the H&S Manager for further investigation and response.

7. Training and Awareness

- All relevant employees will receive basic awareness training on identifying labels, understanding SDS, and proper handling.
- Refresher training conducted annually or as needed.

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8. Monitoring and Review

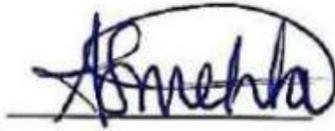
- Annual audits of substances used and storage conditions.
 - Any incidents involving hazardous substances will be recorded and reviewed.
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9. Records

- Inventory list of hazardous substances (however minimal)
- SDS for each item if required
- Training records and disposal logs



Sapna Sachin Mehta
Managing Director



Arav Sachin Mehta
Executive Director



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UAE Clean Energy Frameworks & Targets

1. UAE Energy Strategy 2050

- **Goal:** Increase the contribution of clean energy in the total energy mix to **50% by 2050**:
 - 44% from renewable sources
 - 6% from nuclear energy
 - **Aim:** Reduce carbon footprint of power generation by **70%** and improve energy efficiency by **40%**.
 - **Implication for businesses:** Encouragement to reduce electricity usage, adopt energy-efficient technologies, and contribute to national decarbonization goals.
-

2. UAE Net Zero by 2050 Strategic Initiative

- The UAE aims to be **carbon neutral by 2050**.
 - Businesses are encouraged to align with this goal by:
 - Reducing energy consumption
 - Implementing sustainability measures (e.g., reduced waste, better resource use)
 - Supporting supply chain sustainability
-

3. Dubai Clean Energy Strategy 2050

- Aims to make **Dubai a global center for clean energy and green economy**.
 - Key targets:
 - 25% of Dubai's energy from clean sources by 2030
 - 100% by 2050
 - **Mandates energy-efficient buildings, appliances, and awareness campaigns.**
 - Encourages all businesses to implement sustainable practices, even small offices.
-

Relevant Laws & Regulations

4. Federal Law No. 24 of 1999 on Environmental Protection and Development

- Establishes the framework for pollution control and environmental protection.
- Prohibits emission of pollutants into air, water, or land beyond set limits.
- Requires safe handling and disposal of hazardous materials.

5. Dubai Municipality Environmental Regulations

- Apply to energy usage, waste management, and pollution control.
- Enforce energy efficiency in commercial buildings (e.g., DEWA benchmarking).
- Mandate proper waste separation and recycling compliance.

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6. Free Zone (DMCC) Environmental Standards

- DMCC encourages sustainability and mandates members to:
 - Follow best practices for energy use and environmental compliance
 - Participate in audits if required
 - Avoid illegal discharges or unsafe storage of hazardous materials

Impact for Reve Diamonds DMCC

Even as a low-impact office-based company, we are expected to:

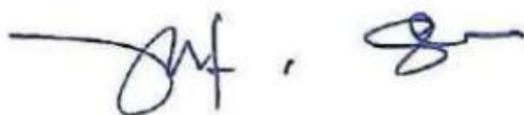
- Reduce electricity and water consumption (e.g., track DEWA bills, switch off equipment)
- Use eco-friendly cleaning products and consumables
- Segregate and dispose of waste properly
- Monitor and document emissions and waste
- Align environmental policy with the Net Zero 2050 framework
- Engage with DMCC or building-level sustainability initiatives when possible

Suggested Next Steps:

- Include reference to UAE Energy Strategy 2050 and Net Zero goals in your Environmental Policy.
- Continue maintaining your **monthly energy consumption log** (via DEWA bills).
- Set further internal **reduction targets** (e.g., 5–10% reduction in energy use annually).
- Periodically review available **DMCC environmental guidance** or sustainability programs.


Sapna Sachin Mehta
Managing Director


Arav Sachin Mehta
Executive Director



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Grievance Policy and Procedure

1. Introduction:

Reve Diamonds DMCC is dedicated to fostering a positive and respectful work environment where employees feel valued and supported. We recognize that conflicts and concerns may arise from time to time, and it is our commitment to address these issues promptly and fairly through established grievance policies and procedures.

2. Scope:

These grievance policies and procedures apply to all employees of Reve Diamonds DMCC, including full-time, part-time, temporary, and contract workers.

3. Definition of Grievance:

A grievance is defined as any concern, complaint, or dissatisfaction related to employment, working conditions, or interpersonal relationships within the workplace.

4. Raising a Grievance:

Employees are encouraged to raise grievances in a timely manner and through the appropriate channels. Grievances may be raised verbally or in writing and should include:

- Nature of Grievance
- Relevant facts and details
- Desired resolution or outcome

Step 1. Identify the Grievance:

- Employees should clearly identify the nature of their grievance, including relevant details and any supporting documentation.

Step 2. Submit the Grievance:

- Employees may submit their grievance verbally or in writing, depending on their preference and the seriousness of the issue. Employees may raise grievances with the HR manager or the Executive Director. Employees may also submit grievances via email at info@revedmcc.com.

5. Grievance Handling Procedure:

Upon receipt of a grievance, the following procedure will be followed:

Step 1. Initial Assessment:

- The HR manager will conduct an initial assessment of the grievance to determine its validity, urgency, and appropriate course of action.

Step 2. Investigation:

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- If necessary, a thorough investigation will be conducted to gather relevant facts and evidence regarding the grievance. This may involve interviews with the employee raising the grievance, witnesses, and any other relevant parties.

Step 3. Resolution:

- Based on the findings of the investigation, efforts will be made to resolve the grievance in a fair and equitable manner. This may involve mediation, conflict resolution techniques, or other appropriate interventions.

Step 4. Communication:

- The employee raising the grievance will be kept informed of the progress and outcome of the grievance process at each stage. Clear and transparent communication will be maintained throughout to ensure the employee's concerns are addressed effectively.

Step 5. Follow-up:

- Following the resolution of the grievance, appropriate measures will be taken to monitor the situation and prevent recurrence. Feedback may be sought from the employee to ensure their satisfaction with the outcome.

6. Confidentiality:

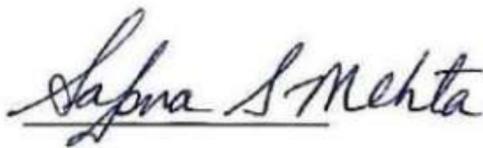
All grievance proceedings will be treated with the utmost confidentiality, respecting the privacy of the individuals involved. Information related to grievances will only be disclosed on a need-to-know basis to those directly involved in the resolution process.

7. Non-Retaliation:

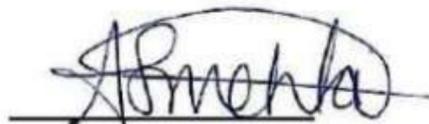
Reve Diamonds DMCC prohibits any form of retaliation against employees who raise grievances in good faith. Employees can raise concerns without fear of reprisal or adverse consequences.

8. Policy Review:

These grievance policies and procedures will be reviewed periodically to ensure their effectiveness in addressing employee concerns and maintaining a harmonious work environment.



Sapna Sachin Mehta
Managing Director



Arav Sachin Mehta
Executive Director



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Non-Retaliation Policy

1. Purpose

The purpose of this policy is to affirm Reve Diamonds DMCC's commitment to a safe, fair, and respectful workplace where all employees can raise concerns, report misconduct, or participate in grievance investigations without fear of retaliation.

2. Scope

This policy applies to all employees of Reve Diamonds DMCC, including full-time, part-time, temporary, and contract workers, regardless of seniority or role.

3. Policy Statement

Reve Diamonds DMCC **strictly prohibits retaliation** of any kind against employees who:

- File a grievance in good faith;
- Report suspected misconduct, harassment, discrimination, or other violations of company policy or law;
- Participate in investigations, hearings, or grievance resolution processes;
- Request workplace accommodations or raise ethical concerns.

Retaliation is defined as any adverse action taken against an employee as a result of such activities, including but not limited to:

- Dismissal or demotion
- Reduction in hours or responsibilities
- Negative performance evaluations
- Exclusion from workplace opportunities
- Threats, intimidation, or any form of mistreatment

4. Reporting Retaliation

If an employee believes they have experienced retaliation, they are encouraged to report it immediately to:

- The HR Manager, or
- The Executive Director / Managing Director

All reports of retaliation will be taken seriously and handled with confidentiality and sensitivity.

5. Investigation & Outcome

- Retaliation complaints will be investigated promptly and fairly.
- If retaliation is substantiated, appropriate disciplinary action will be taken against the perpetrator, up to and including termination.
- The complainant will be informed of the outcome in a respectful and confidential manner.



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6. Protection from Retaliation

Employees who report in good faith are protected under this policy, even if the original concern is not substantiated. Bad-faith or malicious complaints may themselves be subject to disciplinary action.

7. Policy Review

This policy will be reviewed periodically in line with company grievance policies and changes in UAE labor law.



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Policy and Procedure for Community Engagement

Policy Statement

Reve Diamonds DMCC is committed to making a positive social impact in the communities where we operate. As a responsible business, we believe in giving back by supporting initiatives that align with our core values—transparency, ethical sourcing, and inclusivity—and that uplift disadvantaged and underrepresented groups, particularly those related to the jewelry, artisanal, and broader trade sectors.

Objectives

- To support ethical, sustainable, and inclusive practices within our community.
- To empower disadvantaged groups through partnerships and community investment.
- To foster employee engagement through volunteerism and community outreach.
- To uphold our brand values by contributing meaningfully to local development.

Scope

This policy applies to all employees and operations of Reve Diamonds DMCC in Dubai and any community initiatives the company is involved in.

Procedure

Step 1: Identify Potential Initiatives

- Conduct research on local NGOs, social enterprises, vocational training centers, and community programs.
- Evaluate potential partners based on relevance to Reve Diamonds' values (e.g. women empowerment, youth skill-building, sustainability, ethical trade).

Step 2: Evaluate & Vet Opportunities

- Conduct a background check and due diligence.
- Evaluate the group's track record, impact metrics, transparency, and alignment with company values.

Step 3: Propose Engagement Strategy

- Choose the type of engagement (financial support, volunteering, co-branded initiatives, skill workshops, internships, donation drives).
- Determine goals, duration, expected impact, and resources needed.



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Step 4: Get Internal Approval

- Submit proposals to management for approval.
- Include budget, timeline, and KPIs for success measurement.

Step 5: Implement & Monitor

- Assign a team liaison to work with the initiative.
- Track engagement and impact metrics.
- Collect feedback and make adjustments as needed.

Step 6: Reporting & Communication

- Report initiative outcomes in regular internal updates.
- Publicize community engagement on company channels (website, letters).



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Managing Director



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