

	<p>Sauraj Diamonds N.V. 348 Antwerp Diamond Centre Hoveniersstraat 2, Antwerp 2018</p>	<p>Policy & Procedure For Supply Chain Due Diligence</p>
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Supply Chain Due Diligence

Supply Chain Policy

1. Sauraj Diamonds NV is a Diamond Trading Company. This policy confirms Sauraj Diamond NV's commitment to respect human rights, avoid contributing to the finance of conflict and comply with all relevant UN sanctions, resolutions and laws.
2. Sauraj Diamonds NV is a member of the Responsible Jewellery Council (RJC). As such, we commit to proving, through independent third-party verification, that we:
 - a. respect human rights according to the Universal Declaration of Human Rights and International Labour Organization Fundamental Rights at Work;
 - b. do not engage in or tolerate bribery, corruption, money laundering or finance of terrorism;
 - c. support transparency of government payments and rights-compatible security forces in the extractives industry;
 - d. do not provide direct or indirect support to illegal armed groups; and
 - e. enable stakeholders to voice concerns about the jewellery supply chain.
 - f. are implementing the OECD 5-Step framework as a management process for risk based due diligence for responsible supply chains of minerals from conflict-affected and high-risk areas.
3. We also commit to using our influence to prevent abuses by others. Our supplier is not from CAHRA and we do not procure goods from CAHRA.
4. Regarding serious abuses associated with the extraction, transport or trade of diamonds/coloured gemstones
We will neither tolerate nor profit from, contribute to, assist or facilitate the commission of:
 - a. torture, cruel, inhuman and degrading treatment;
 - b. forced or compulsory labour;
 - c. the worst forms of child labour;
 - d. human rights violations and abuses; or
 - e. war crimes, violations of international humanitarian law, crimes against humanity or genocide.
5. We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are committing abuses described in 4 or are sourcing from, or linked to, any party committing these abuses.
6. Regarding direct or indirect support to non-state armed groups
We only sell or purchase diamonds/coloured gemstone that are fully compliant with the Kimberley Process Certification Scheme and, as such, will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring diamonds/coloured gemstones from, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates who illegally:
 - a. control mine sites, transportation routes, points where diamonds/coloured gemstones are traded and upstream actors in the supply chain; or
 - b. tax or extort money or diamonds/coloured gemstones at mine sites, along transportation routes or at points where diamonds/coloured gemstones are traded, or from intermediaries, export companies or international traders.
7. We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are sourcing from, or are linked to, any party providing direct or indirect support to non-state armed groups as described in paragraph 6.
8. Regarding public or private security forces
We affirm that the role of public or private security forces is to provide security to workers, facilities, equipment and property in accordance with the rule of law, including law that guarantees human rights. We will not provide direct or indirect support to public or private security forces that commit abuses described in paragraph 4 or that act illegally as described in paragraph 6.
9. Regarding bribery and fraudulent misrepresentation of the origin of diamonds/coloured gemstones
We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of diamonds/coloured gemstones, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of diamonds.
10. Regarding money laundering
We will support and contribute to efforts to eliminate money laundering where we identify a reasonable risk resulting from, or connected to, the extraction, trade, handling, transport or export of diamonds/coloured gemstones.

Shalin Mehta

1st January 2026

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Requirements

- OECD Guidelines for responsible Supply Chain

OECD

- ❖ Organisation for Economic Co-operation and Development. International Organisation committed to Democracy and Market Economy

Supply Chain

- ❖ Supply Chain includes all the Raw Material and Parts that are made into a product.

Diamond, Lab Grown / Synthetics

- ❖ Diamond is a natural mineral consisting essentially of pure carbon crystallised with a cubic structure in the isometric system. Its hardness in the Mohs scale is 10; its specific gravity is approximately 3.52; it has a refractive index of 2.42 and it can be found in many colours
- ❖ A Lab Grown Diamond is any object or product that has been either partially or wholly crystallised or re-crystallised due to artificial human intervention such that being the exception of being non-natural, the product meets the requirements specified for “Diamond” but is Lab Grown

Supply Chain Integrity

- ❖ Responsible Supply Chain

1. Strong Company Management System

- Company has a strong management system in line with the requirements of RJC CoP 2019 and Regulatory and Statutory requirements.
- The management system is audited by RJC Accredited Auditors periodically.
- Company has established and implemented Supply Chain Policy and Procedure
- The Supply Chain Policies and Procedures available on the website

2. Identify and Assess the Risks in the Supply Chain

- Company has mapped the suppliers in different risk groups
- Management engages with the suppliers at every order
- Management also visits the suppliers at least once annually
- The Human Rights and other risks associated with the supply chain are identified and listed in the Risk Assessment
- Internet resources and the Sanctions list by US Treasury and EU is used to identify the risks associated with the CAHARs and other Human Rights risks in the supply chain.

3. Manage the Risks

- The controls based on the severity of the identified risks are identified
- The controls to eliminate or mitigate the risks are implemented
- The controls are verified for effectiveness

4. Due Diligence Practices

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- a. Management conducts this due diligence process periodically or when a new supplier comes in play

5. Publicly Report on Due Diligence

- a. The result of the due diligence process is reported on the website.
- b. For any concerns that needs to be raised, e-mail address is available on the website
- c. On receipt of the concern, management will mark it as a Red Flag and investigate
- d. In case the investigation reveals no adverse Human Rights impacts, the investigation is closed
- e. In case the investigation reveals a possibility of adverse Human Rights Impacts, Management will engage with the supplier for Corrective Action Plan
- f. The investigation will be closed if the Corrective Action Plan is implemented successfully
- g. In case the supplier does not come up with a Corrective Action, Management will take a call on removing the supplier

Shalin Mehta
Director