

# **REPORTING REQUIREMENTS**

**FOR COPs**

**3, 6, 7**

**Sauraj Diamonds NV**



## COP 3: REPORTING

### Contact Information

COMPANY NAME: **Sauraj Diamonds NV**  
DATE: **01 January 2026**  
REPORTING PERIOD: **2025**  
CONTACT: **vicky@sauraj.com**

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### ISSUES

Sauraj Diamonds N.V. will be providing details on the following identified during our due diligence activities.

Human Rights Due Diligence: Human Rights Due Diligence has been conducted for our own processes and operations. No adverse impacts were identified. Due diligence has also been conducted on the supply chain.

Environmental Management: No significant environmental impacts are identified. Electricity is saved by switching off lights when not required and opening windows to reduce electricity consumption from Air Conditioner. Paper is reused where possible to reduce waste. The trading process does not use any natural resources like water or power. They are more like overheads.

Working Conditions: External agency inspects the work place for Health and Safety Issues and the concerns raised, if any are addressed.

Sustainable Development Goals: Company is small trading office and contributes to SDG where possible. But no targets are set. The business creates jobs in associated services provided by others in trading operations, shippers, delivery people, security personnel, clearing agents.

Business Partners: We recommend to all our business partners to join the Responsible Jewellery Council initiative to improve the credibility of the diamond and jewellery industry. It is an initiative that will benefit the companies in managing their business responsibly and transparently. The RJC CoP 2019 will also improve the credibility of the Industry for benefit to all.

## COP 6 & 7: HUMAN RIGHTS & DUE DILIGENCE

### Contact Information

COMPANY NAME: **Sauraj Dimaonds N. V.**  
DATE: **01 January 2026**  
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CONTACT: **vicky@sauraj.com**

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### COMPANY MANAGEMENT SYSTEMS

Sauraj Diamonds NV has the following policies in place. Corporate Policy, Supply Chain Policy. The policies are also uploaded on the website, detailing our commitment to respect human rights throughout our supply chain and our supply chain due diligence on the following minerals – diamonds, originating from conflict-affected and high-risk areas. Sauraj Diamonds N.V. endorse these policies to our suppliers and stakeholders by distributing them via our website and through communications. These policies can also be accessed by our internal stakeholders via the Display in the office and externally via our website.

We have also conducted a Human Rights due diligence of our operations. No adverse Human Rights impacts are found.

To support supply chain due diligence, we have implemented the following internal measures. We get written commitment from our suppliers to the effect that they have conducted and no Red Flags are identified. In case there are Red Flags, the supplier is resolving the same with their suppliers. We engage with the suppliers at every order to ensure that the supply chain integrity is maintained. The senior manager responsible for overseeing supply chain due diligence is the Director Shalin Mehta. To aid us in identifying our human rights impacts we have developed and implemented the follow systems. We have the Human Rights Policy as part of the Corporate Policy and Supply Chain Policy which are available on the website. There is also a Supply Chain Procedure for internal use. The senior manager responsible for overseeing our human rights impacts is Shalin Mehta along with Vicky Smits. No Red Flags have been identified.

Sauraj Diamonds N.V. has established a system of controls and transparency over our supply chain, which include our approach for identifying suppliers through their KYC and through Market Sources and identifying sources of our Diamonds by asking them the details of known / mixed sources of their supply to us. The rough diamonds are from known mines / producers. These methods have strengthened our due diligence efforts by ensuring that the supply chain is responsible.

As a company we communicate our expectations regarding human rights and supply chain due diligence by publishing our Policies on the website. We also engage with the suppliers at every order and verbally communicate the requirements of a responsible supply chain. We also ask them to give written confirmation of their supply chain due diligence and the source of the material supplied to us. In addition to this, we also take following steps to strengthen our engagement with suppliers; we talk to them at every order, we visit them, meet them and communicate with them; the outcome of doing so has been better transparency of our supply chain.

Our grievance mechanism for internal stakeholders can be accessed via Policy and procedure for Employment, our external grievance mechanism is available via our website and direct communication with director. Customers and suppliers communicate with the director. No grievances were received in 2024.

### IDENTIFIED & ASSESSED RISKS

We assess our own and supplier's due diligence practices and those relating to human rights by engaging with the suppliers and mapping our supply chain. Our Rough Diamonds are supplied locally by producers or their direct customers. They are all from Belgium and are low risk. Our Polished diamonds come from India and from known sources.

The suppliers are also low risk. We have conducted a supply chain risk assessment in the overall risk assessment and implemented adequate controls to mitigate the risk. We also ensure that all the goods purchased are free of any conflict diamonds to prevent any Human Rights violations.

During our assessment of our own and our supplier's due diligence practices and those relating to human rights, we identified the below potential and actual risks within our supply chain.

- We have identified a potential risk of polished diamond manufacturers not complying with the requirements of prevention of child labour and forced labour and payment of minimum wages and fair treatment of workers in India.

To mitigate the Risk, we have implemented a system of purchasing from known and verified sources. We monitor and track the performance of risk mitigation by engaging with the suppliers.

## STRATEGY

Our risk assessment findings are received by the director and the risks are adequately controlled.

To respond to the risks identified within our supply chain, we took the following steps to design and implement a risk management plan to review the risks annually and to ensure that the controls are implemented. Currently all the risks are adequately mitigated.

To implement our risk management plan we have taken the following risk mitigation steps. We buy from known sources, who have verified their supply chain or are manufacturing themselves. We buy from RJC CoP 2019 certified members as far as possible.

All employees have been trained in the Human Rights requirements over the years.

We communicate to our stakeholders regarding our due diligence activities and efforts to prevent human rights risks. This communication is in the form of Report published on the website. If and when a human rights risk is identified we communicate the risk and how we are addressing it to potentially affected stakeholders by reporting on the website. Since our last report no grievances have been raised.

## CARRY OUT A THIRD PARTY AUDIT (OPTIONAL INFORMATION)

Sauraj Diamonds N.V. has joined the RJC in June 2009 and has since achieved 5 consecutive 3 year certifications since October 2011

In support of our continuous improvement journey, our latest third-party RJC audit took place within our organisation against the RJC COP 2019 on 11<sup>th</sup> September 2023.

Shalin Mehta  
Director  
1<sup>st</sup> January 2026