**DIAMOND UNIVERSE LLC**

RJC POLICIES AND PROCEDURES DOCUMENT

**Doc. No: DU-RJC-001**

**ADDRESS**

**16 West, 46th Street, 8th Floor, New York, NY 10036**

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| --- | --- | --- |
| **PARTICULARS** | **NAME** | **DATE** |
| **PREPARED BY** | **Mr Sanjay Shah** | **03rd April 2025** |
| **CHECKED BY** | **Mr Tony Kheskwani** | **03rd April 2025** |
| **APPROVED BY** | **Sneha Kheskwani** | **03rd April 2025** |
| **NEXT REVISION DA** | | **03rd April 2026** |

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**DOCUMENT APPROVAL**

This Policies and Procedures Document (DUL-RJC-001) represents the commitment of DIAMOND UNIVERSE LLC to comply with the requirements of the Code of Practices, 2024/ LGM Standard of the Responsible Jewellery Council.

The contents of this document have been reviewed and approved by me.

All employees of DIAMOND UNIVERSE LLC are required to be familiar with this document and comply with various requirements contained in this document.

I am responsible to make changes / revisions to this document and all employees are advised to bring to my attention any problems that they may face in the implementation of the requirements contained in this document.

**Director**

**Part A: Introduction**

**Part A: Introduction**

A1 **DIAMOND UNIVERSE LLC** is a member of RJC.

|  |  |  |
| --- | --- | --- |
| **No.** | **Entity Name and Address** | **Nature of Operations** |
| **1** | **DIAMOND UNIVERSE LLC**  16 West, 46th Street, 8th Floor, New York, NY 10036 | * Jewelry /Diamond Sales & Buying Office |

A2 This Policies and Procedures document has been developed to demonstrate commitment of the management as well as provide evidence to pipeline Directors, consumers and other stakeholders that the activities of **DIAMOND UNIVERSE LLC** is in line with the requirements of the “Code of Practices (COP)” of the Responsible Jewellery Council (RJC)/ LGM Standard.

A3 The policies and procedures described in this document are the outcome of a “Risk Assessment” carried out for all the processes of **DIAMOND UNIVERSE LLC** with reference to the various requirements of the standards.

A4 This document is approved by the Director of **DIAMOND UNIVERSE LLC** and is made available to all the employees of the **DIAMOND UNIVERSE LLC**

A5 The entire management system of **DIAMOND UNIVERSE LLC** that addresses the requirements of the Responsible Jewellery Council (RJC) COP is contained in the following documents:

|  |  |  |
| --- | --- | --- |
| **Sr. No.** | **Document No.** | **Document Title** |
| 1 | DUL-RJC-001 | RJC Policies and Procedures Document |
| 2 | DUL-AMU-002 | AML/CFT and Anti-Bribery Manual |
| 3 | DUL-HMU-003 | HSE Manual |
| 4 | DUL-EMU-004 | Employee Manual |
| 5 | DUL-PMU-005 | Product Security Manual |
| 6 | DUL-RMU-006 | Risk Assessment Manual |
| 7 | DUL-SMU-007 | Synthetic Diamond Management Procedure |

A6 The management reserves the rights to amend, modify, suspend or withdraw at its sole discretion and without reference or concurrence of any other persons, any part of or the entire manual or manuals. Nothing contained in these manuals shall give any right or cause of action to any person against **DIAMOND UNIVERSE LLC**

A7 The management of **DIAMOND UNIVERSE LLC** has appointed the following person as coordinator to overview the implementation of and adherence to the RJC COP 2024/LGMS requirements:

A8 The responsibilities of the coordinator will include the following:

* Ensuring that the requirements of the RJC COP 2024/LGMS are followed by the company.
* Spreading awareness among all employees about the requirements.
* Carrying out internal assessments and identifying areas of non-conformance.
* Reporting to management on the effectiveness of the implementation process and resolving issues that need management intervention.
* Coordinating with the consultants and external agencies, including the third-party auditing agency.

**Part B: Business Policies**

**B.1 Introduction**

This section of the Manual contains the Business Policies that has been adopted by the management of **DIAMOND UNIVERSE LLC** This Business Policies document draws its content from the Responsible Jewellery Council (RJC) Policies and Code of Practices and is intended to achieve the requirements of these standards.

**B.2 Business Policies Document**

**01. Background**

* 1. At **DIAMOND UNIVERSE LLC**, our philosophy is to measure success by not only the results we achieve, but also how we achieve them.
  2. This Business Policies document, adopted by the management of **DIAMOND UNIVERSE LLC** sets forth the basic internal standards to be observed by all Directors, officers and employees of the company with respect to conducting business in a legal, ethical, professional and accountable manner.
  3. **DIAMOND UNIVERSE LLC** shall take appropriate steps to ensure that the same is understood and put into practice by all of its Directors, officers and employees.
  4. **DIAMOND UNIVERSE LLC** takes appropriate steps to assure adherence to this Business Policies document, including establishing appropriate disciplinary procedures where violations of this document will result in sanctions up to and including discharge.
  5. Any amendment to the defined Business Policies will be subject to the approval of the management of **DIAMOND UNIVERSE LLC** No exemption or suspension of these Business Policies in whole or part will be permitted unless approved in advance by the Management of **DIAMOND UNIVERSE LLC.**

**02. RJC Compliance Policy**

The management of **DIAMOND UNIVERSE LLC**, as a member of the Responsible Jewellery Council (RJC) is committed to complying with the Code of Practices of RJC/LGMS.

We shall strive to:

* Adhere to ethical business practices
* Uphold fundamental human rights, treat workers with respect, encourage diverse workforce and provide a safe working environment
* Promote efficient resources and energy and reduce and prevent pollution
* Comply with applicable laws in the countries where we operate and manage business risks including contractors, suppliers and Directors.

**03. Legislation and Regulations**

1. **DIAMOND UNIVERSE LLC** shall operate in compliance with relevant national and international legislations / regulations as applicable to its operations.
2. All personnel are expected and directed to comply with all applicable laws and regulations as well as all internal company rules and policies relating to their business activities. It also is the responsibility of personnel to know and understand legal, regulatory and internal requirements as they apply to their jobs.

**04. Conducting Business Ethically, with Integrity, and in Fairness**

1. Ensuring that all business activities are conducted in an honest, ethical, professional and accountable manner is fundamental to the core philosophy of our company.
2. **DIAMOND UNIVERSE LLC** is committed to combating dishonesty and fraud in all business transactions in order to maintain and enhance consumer trust in, and the reputation of the gem diamond industry.
3. **DIAMOND UNIVERSE LLC** is committed to maintaining the highest standards of financial integrity for the benefit of all our stakeholders.
4. All accounting records, and reports produced from those records, must be maintained and presented according to the laws of the country of operation. **DIAMOND UNIVERSE LLC** shall ensure compliance with generally accepted accounting policies in the country of operation as well as the company’s system of internal controls.
5. It is the responsibility of **DIAMOND UNIVERSE LLC** to pursue its corporate value enhancement through sound business practices. Our business activities have direct and indirect impact on the society in which we operate, and therefore sound business practice requires that business decisions give due consideration to the interests of its stakeholders.
6. Shareholders, customers, employees, suppliers, business Directors, local communities and other Company’s. All employees must endeavor to conduct the business of **DIAMOND UNIVERSE LLC** accordingly.
7. In making business decisions, employees must act on an informed basis, in good faith, and in the honest belief that the action taken is in the best interest of **DIAMOND UNIVERSE LLC.**
8. **DIAMOND UNIVERSE LLC** has put in place programs that monitor the effectiveness of these commitments and hence supporting all workers in this endeavor.

**Equality, Diversity & Inclusion Policy Statement**

1. The Company recognizes that we are all unique, whether in terms of our background, personal characteristics, experience, skills or motivations, and the Company value its people for the differences they bring. These differences, this diversity is powerful.
2. The Company is committed to building a culture that values openness, fairness, and transparency with a workforce that is truly representative of communities in which it operates and where employees feel respected and able to achieve their potential. Fostering an inclusive culture helps everyone to benefit from a wider range of different perspectives, experiences, and skills. The Company believes that this creates a happier, more productive working environment for all.
3. This policy statement applies to anyone working for the Company. This includes employees, workers, contractors, and apprentices. The policy also relates to job applicants and is relevant to all stages of the employment relationship.

**04. Bribery, Anti-Corruption, Facilitation Payments and Gifts**

1. **DIAMOND UNIVERSE LLC** is committed to prohibit bribery in all business practices and transactions that are carried out by the company or on its behalf by business Directors. The company will not offer, accept or countenance any payments, gifts in kind, hospitality, expenses or promises as such that may compromise the principles of fair competition or constitute an attempt to obtain or retain business for or with, or direct business to, any person; to influence the course of the business or governmental decision-making process.
2. **DIAMOND UNIVERSE LLC** considers Bribery Risk as it applies to its organization (including agents) to identify which areas pose high risks. **DIAMOND UNIVERSE LLC** has developed appropriate methods to monitor conduct of employees and agents and eliminate bribery based on this understanding.
3. The management of **DIAMOND UNIVERSE LLC** facilitates the reporting of incidences of attempted bribery or inappropriate gifts within their organization and shall apply appropriate sanctions for bribery and attempted bribery in all forms.
4. **DIAMOND UNIVERSE LLC** ensures that no employee will suffer demotion, penalty or other adverse consequences for voicing a concern, or for refusing to pay a bribe or facilitation payment even if this action may result in the enterprise losing business.

**05. Money Laundering, Terrorism Financing, Other Financial Offences**

1. **DIAMOND UNIVERSE LLC** recognizes the fact that company in the gems and jewelry sector have to take on the onus of analyzing their potential vulnerabilities to money laundering and implement specific steps that are required for protection against abuse by criminals.
2. Strict compliance is required at all times, with all applicable national and, where appropriate, international laws / regulations with respect to money laundering, terrorism financing, bribery, corruption, smuggling, embezzlement, fraud, racketeering, transfer pricing and tax evasion.
3. **DIAMOND UNIVERSE LLC** shall act in accordance with national laws and national / international accounting standards with respect to maintaining financial accounts of all business transactions and auditing of its financial accounts by properly qualified and independent auditors, if require.
4. **DIAMOND UNIVERSE LLC** ensures that concerned employees know and understand the relevant regulatory jurisdiction for national and international transactions, money laundering / financial offences related legal, regulatory and internal requirements as they apply to their jobs. Ignoring or not reporting suspicious activity that appears to be questionable may also is considered as a violation of the Business Policies, depending on the seriousness of the non-conformance.
5. **DIAMOND UNIVERSE LLC** implements a “Know your customer” and “Know your Supplier” procedure that establishes the id company of all organizations with which it deals, have a clear understanding of their business relationships and have a reasonable ability to identify and react to transaction patterns appearing out of the ordinary or suspicious.

**06. Kimberley Process and System of Warranties**

1. **DIAMOND UNIVERSE LLC** is fully committed to complying with all the requirements specified in the Kimberley Process Certification Scheme and World Diamond Council’s (WDC) System of Warranties Declaration.
2. The definition of ‘Conflict Gem Stone Diamonds’ as agreed by the Kimberley Process will be adopted i.e.

“diamonds used by rebel movements or their allies to finance conflict aimed at undermining legitimate Governments, as described in relevant United Nations Security Council (UNSC) resolutions in so far as they remain in effect, or in other similar UNSC resolutions which may be adopted in the future, and as understood and recognized in United Nations General Assembly (UNGA) Resolution 55/56, or in other similar UNGA resolutions which may be adopted in the future.”

1. Wherever applicable, the following affirmative statement as recommended by the World Diamond Council’s System of Warranties should be printed on all the invoices:

“The diamonds herein invoiced have been purchased from legitimate sources not involved in funding conflict, in compliance with United Nations Resolutions and corresponding national laws. The seller hereby guarantees that these diamonds are conflict free and confirms adherence to the WDC SoW Guidelines.”

1. Entering into transactions involving ‘conflict diamonds’ or not following the System of Warranties Declaration in invoices will be considered as a violation of the Business Policies.
2. **DIAMOND UNIVERSE LLC** ensures that concerned personnel within the organization know about government restrictions on the trade in Conflict Diamonds, the Kimberley Process Certification Scheme and the World Diamond Council System of Warranties.

**07. Product Security**

1. DIAMOND UNIVERSE LLC is committed to establish and implement product security measures within the premises and during shipments to protect against product theft, damage or substitution.
2. The security and wellbeing of employees, visitors and other relevant business Directors is prioritized when establishing product security measures.
3. All products sold by DIAMOND UNIVERSE LLC to consumers shall comply with applicable regulations of product health and safety.

**08. Product Integrity / Disclosure**

1. **DIAMOND UNIVERSE LLC** is committed to complying with relevant trading standard legislation and specific national and local regulations applicable to its products.
2. The following essential Policies will be applicable in all transactions of DIAMOND UNIVERSE LLC involving diamonds, treated diamonds, synthetics and stimulant

* **Disclosure - DIAMOND UNIVERSE LLC** shall fully and accurately disclose the material characteristic of their products. All reasonable efforts shall be made to properly disclose all relevant information on the physical characteristics, such as mass/weight, cut, color, clarity or fineness, of a diamond or gold jewelry product.
* **Misrepresentation -** No untruthful, misleading or deceptive statement, “representation” or material omission in the “selling”, “advertising” or distribution of any diamond, treated diamond, synthetic, or simulant, or any gold product, shall be made by the Company in any medium, including the internet
* **Diamond Quality -** The weight, color, clarity or cut of diamonds will be described in accordance with the recognized guidelines appropriate to the particular jurisdiction.
* Full disclosure i.e. the complete and total release of all available information about a Diamond and all material steps it has undergone prior to sale to the purchaser,
* Irrespective of whether or not the information is specifically requested and regardless of the effect on the value of the diamond.
* No misuse of terminology or miss-representations or attempts to disguise the product will be made in the selling, advertising and distribution of treated diamonds, synthetics and simulant.
* The word ‘diamond’ will not be used in the case of names of firms, manufacturers or

Trademarks; in connection with treated diamonds or diamond simulant or synthetic Diamonds.

1. **DIAMOND UNIVERSE LLC** has adopted the following definitions:

**Diamond:** A diamond is a natural mineral consisting essentially of pure carbon crystallized with a cubic structure in the isometric system. Its hardness in the Mohs scale is 10; its specific gravity is approximately 3.52; it has a refractive index of 2.42 and it can be found in many colors.

**Synthetic:** A synthetic is any object or object that has been either partially or wholly crystallized or re-crystallized due to artificial human intervention such that, with the exception of being non-natural, the product meets the requirements specified in the definition of the word ‘diamond’ above.

**Treated Diamond:** A treated diamond is any object or product that meets the requirements specified in the definition of the word ‘diamond’ and ‘synthetic’ above, but has been subject to some form of treatment i.e. any process, enhancement changing, interfering with and/or contaminating the natural appearance or composition of a diamond other than historically accepted practices of cutting and polishing. This includes color and decolorization treatment, fracture filling, laser and irradiation treatment and coating.

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

**09. Supply Chain System - Synthetic Diamonds**

1. The company recognizes that diamond industry is at a risk of reputational damage due to undisclosed synthetics being sold to end consumers. Towards this end the company is committed to identify and eliminate the chances of undisclosed diamonds entering its supply chain.
2. The company is committed to continuously monitor its supply chain for identification of high-risk areas and implementing risk control on an ongoing basis.
3. All relevant employees shall be trained on the requirements and system of pipeline monitoring for undisclosed synthetic detection
4. The company shall identify applicable legislation for undisclosed synthetics and initiate appropriate action on detection
5. Synthetic diamonds trading if required shall be undertaken with full disclosure in accordance with the disclosure norms

**10. Supply Chain Management / Business Directors**

1. DIAMOND UNIVERSE LLC considers risks related to business ethics, human rights, social and environmental business practices of significant business Directors which have the potential to impact its own practices arising from such business relationships.
2. DIAMOND UNIVERSE LLC is committed to taking appropriate action to use best endeavors to promote responsible business practices among its “business Directors” and to ensure the commitment of business Directors to comply with the Code of Practices.
3. DIAMOND UNIVERSE LLC ensures that contractors working in its facilities and visitors are required to comply with its management and operating systems relevant to RJC COP.

**10. Employment**

* 1. DIAMOND UNIVERSE LLC complies with applicable national laws / regulations with respect to employment.
  2. DIAMOND UNIVERSE LLC is committed to maintaining appropriate records as stipulated by the regulatory authorities for all staff employed, whether on a full time, part time or seasonal basis.
  3. DIAMOND UNIVERSE LLC shall not require workers to work for more than the national limit of hours in a week on a regular basis, with overtime hours not to exceed the national permitted limit per week on a regular basis unless there are legal opt-outs.
  4. DIAMOND UNIVERSE LLC shall ensure that wages and benefits for a standard working week shall meet at least national minimum standards and shall be sufficient to meet the basic needs of workers. Wages shall be paid to employees on a regular and predetermined basis in a manner and location convenient to employees, accompanied by a wage slip detailing wage rates, benefits and deductions as applicable.
  5. DIAMOND UNIVERSE LLC shall ensure that due process of wage deductions shall be followed where applicable and it shall not be binding on employees to buy provisions from the company.
  6. When required, due recognition will be given to the existence, membership and lawful activities of worker representative bodies, and worker representatives will be given access to carry out their responsibilities / functions.
  7. DIAMOND UNIVERSE LLC is committed to addressing the legitimate grievances of its employees.
  8. DIAMOND UNIVERSE LLC shall follow proper procedure as per law for dismissal of employees, in case the need for the same arises, and arbitrary dismissal procedures shall be avoided.
  9. Information regarding applicable employment policies and working practices shall be communicated in a transparent manner to all employees

**11. Health and Safety**

DIAMOND UNIVERSE LLC recognizes the need to develop a sustainable, value creating business and is committed to the following in the areas of workplace health and safety:

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

**12. Non-Discrimination, Discipline and Grievance Procedures**

1. Discrimination can mean distinction, exclusion or preference.
2. Any form of discrimination relating to the hiring, discharge, pay, promotion, overtime, retirement and training of employees on the basis of race, ethnicity, caste, national origin, religion, age, disability, gender, marital status, physical appearance, sexual orientation, HIV status, Migrant status, membership of worker representative bodies, political affiliations, pregnancy status or any criteria that are unlawful is strongly discouraged by DIAMOND UNIVERSE LLC and any such reported incidents will be viewed as a serious violation of this Business Policies.
3. DIAMOND UNIVERSE LLC will ensure that employees who have certain life-threatening diseases or illnesses are not treated differently from other employees, and will continue to employ such personnel, as long as they are physically and mentally fit to attend to their normal job responsibilities.
4. Individuals who are “Fit for Work” shall be accorded equal opportunities and shall not be discriminated against on the basis of factors unrelated to their ability to perform their job.
5. DIAMOND UNIVERSE LLC shall not use corporal punishment under any circumstances and will ensure that employees are not subjected to harsh or degrading treatment, sexual or physical harassment or other forms of mental or physical coercion, abuse or intimidation.
6. DIAMOND UNIVERSE LLC encourages all personnel to voice concerns promptly, if they have a genuine reason to believe that a policy, company operation or practice is or will likely be in violation of any law, regulation or internal company rule or policy, including this
7. Business Policies. DIAMOND UNIVERSE LLC assures all employees who come forward in good faith to report issues, that they will be treated fairly and respectfully. While all efforts will be taken to protect the anonymity of employees as far as practicable, any form of retaliation
8. Against any such individuals, assuming they have not been involved in the violation will not be tolerated.

**13. Child Labor**

1. No form of child labor should be employed at DIAMOND UNIVERSE LLC.
2. The minimum age for employment that will be applicable is fifteen (As per ILO Convention No. 138).
3. For authorized adolescents (persons below 18 years of age but above 15 years), the company management is responsible for providing working conditions, hours of work and wages in compliance with applicable local laws as a minimum.
4. If a child is found working at DIAMOND UNIVERSE LLC, either own or subcontracted, the responsibility of rehabilitation will be undertaken by the management.
5. The above policies will also be applicable to subcontracted labor.

**14. Forced Labor**

1. The management of DIAMOND UNIVERSE LLC is fully committed to ensuring that forced or involuntary, bonded, indentured or prison labor, is not practiced nor used in any form at any of its facilities. DIAMOND UNIVERSE LLC shall ensure that there is no restriction in the freedom of movement of employees and dependents. Any reported incidents relating to forced labour will be considered as a serious violation of this Business Policies.
2. The following definitions will be applicable:

* The Universal Declaration of Human Rights that states that ‘No one shall be held in slavery or servitude’
* ILO Convention 29, which defines forced or compulsory labor as ‘all work or service which is extracted from any person under the menace of any penalty, and for which they said person has not offered himself voluntarily”

**15. Human Rights**

1. All employees in DIAMOND UNIVERSE LLC will be treated with equality, respect and dignity.
2. DIAMOND UNIVERSE LLC believes in and respects the fundamental human rights according to the United Nations Universal Declaration of Human Rights.
3. DIAMOND UNIVERSE LLC will not interfere in the right of employees to observe tenets or practices based on caste, race, national origin, gender, religion, disability, union membership, or political affiliation
4. DIAMOND UNIVERSE LLC strongly discourages any form of sexually coercive, threatening, abusive or exploitative behavior.
5. Any reported incidents relating to direct or indirect physical, sexual, racial, religious,   
   psychological, verbal, or any other form of harassment or abuse, or any other form of intimidation or degrading treatment will not be tolerated by the Company.
6. Security personnel, if employed by DIAMOND UNIVERSE LLC, are trained to respect the human rights and dignity of all people and use of minimum force proportionate to the perceived threat.
   1. **Community Development and Engagement**

DIAMOND UNIVERSE LLC is committed to the development of communities where it operates, contributing to their social and economic welfare

**17. Environment Performance**

DIAMOND UNIVERSE LLC is committed to effective environmental performance and will focus on the following initiatives:

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

**18.** **Provenance Claim**

**Provenance Claims**

The policies relating to this section are part of the Business Principles adopted by DIAMOND UNIVERSE LLC and is presented below for reference:

“The company shall ensure all its Provenance Claims made will be fully valid along with available evidence to support the Claim(s)”

**Origin -** Geographical origin of material, for example country, region, mine or corporate ownership of the Mining Facility/ies; and/or

**Source -** Type of source, for example recycled, mined, artisanal mined, or date of production; and/or

**Practices -** Specific practices applied in the supply chain relevant to the Code of Practices, including but not limited to, standards applicable to extraction, processing or manufacturing, conflict-free status, or due diligence towards sources.

Provenance Claims may also relate to origin, sources or practices that are specifically excluded from the supply chain, such as through a ‘negative warranty’.

The company shall ensure that all claims and statements (made to consumers or other businesses) on practices in the supply chain and the origin or source of Diamonds, Synthetics, Gold and / or Platinum through the use of both descriptions and symbols are valid.

The company shall ensure that there will be no attempt to mislead consumers through illustrations, descriptions, expressions, words, figures, depictions or symbols relating to the Provenance Claim(s).

The company shall ensure that all the relevant employees are aware about the provenance claim and it procedures.

**1: Legal Compliance**

**C: General Requirements**

**1.1.1 Policy Statement COP 1**

To maintain and enhance customer trust in, and the reputation of the diamond and jewelry industry, DIAMOND UNIVERSE LLC is fully committed to ensuring that all the business processes and transactions are undertaken in a professional, ethical, environment friendly and socially accountable manner. DIAMOND UNIVERSE LLC has defined and adopted a Business Policies document that sets forth the basic standards to be observed by all Directors, officers and employees. The full text of the Business Policies document is presented in Part B of this manual.

The specific policies of the Company with respect to “Legislation and Regulations” and “Conducting Business Ethically, with Integrity, and in Fairness” are presented below for reference:

**Legislation and Regulations**

1. DIAMOND UNIVERSE LLC shall operate in compliance with relevant national and international legislations / regulations as applicable to its operations.
2. All personnel are expected and directed to comply with all applicable laws and regulations as well as all internal company rules and policies relating to their business activities. It also is the responsibility of personnel to know and understand legal, regulatory and internal requirements as they apply to their jobs.

**Conducting Business Ethically, with Integrity, and in Fairness**

1. Ensuring that all business activities are conducted in an honest, ethical, professional and accountable manner is fundamental to the core philosophy of our company.
2. DIAMOND UNIVERSE LLC is committed to combating dishonesty and fraud in all business transactions in order to maintain and enhance consumer trust in, and the reputation of the gem diamond industry.
3. DIAMOND UNIVERSE LLC is committed to maintaining the highest standards of financial integrity for the benefit of all our stakeholders.
4. All accounting records, and reports produced from those records, must be maintained and presented according to the laws of the country of operation. DIAMOND UNIVERSE LLC shall ensure compliance with generally accepted accounting policies in the country of operation as well as the company’s system of internal controls.
5. It is the responsibility of DIAMOND UNIVERSE LLC to pursue its corporate value enhancement through sound business practices. Our business activities have direct and indirect impact on the society in which we operate, and therefore sound business practice requires that business decisions give due consideration to the interests of its stakeholders including shareholders, customers, employees, suppliers, business Directors, local communities and other Company’s. All employees must endeavor to conduct the business of DIAMOND UNIVERSE LLC accordingly.
6. In making business decisions, employees must act on an informed basis, in good faith, and in the honest belief that the action taken is in the best interest of DIAMOND UNIVERSE LLC.
7. DIAMOND UNIVERSE LLC has put in place program that monitor the effectiveness of these commitments and hence supporting all workers in this endeavor.

**1.1.2 Compliance to Applicable Legislation and Regulations**

* 1. DIAMOND UNIVERSE LLC has implemented a suitable mechanism to ensure compliance with applicable regulatory requirements. The Compliance Register maintained by the company details principal aspects relating to applicable regulations, obligation under each regulation, documentation to be maintained, person responsible, frequency / time period for renewal of licenses or payment of statutory dues and any other relevant information.
  2. DIAMOND UNIVERSE LLC has established suitable systems to ensure that information with respect to amendments to applicable regulations and new regulations are kept updated at all times. Specific initiatives include:
* Nomination of specific personnel (Compliance Officer) who are responsible for this activity
* Appointment of consultants who apprise the management on amendments / new regulations
* Regular interaction with accountant and statutory auditor
* Prompt review and analysis of circulars issued by Trade Associations and Regulatory agencies

**1.1.3 Financial Reporting and Appointment of Auditors**

* 1. The annual books of accounts of DIAMOND UNIVERSE LLC is maintained and audited independently by a qualified auditor as per applicable laws / regulations and acceptable accounting standards in the respective country of operation, if require. To ensure that the appointment of auditors is free of any bias or influence, a contract is entered into with the auditors specifying their roles and the period of their appointment. Appointment of auditors for DIAMOND UNIVERSE LLC is governed by the applicable regulations and guidelines in the respective country of operation.

**1.1.4 Compliance Monitoring: Ethical Standards**

1. The management of DIAMOND UNIVERSE LLC has implemented necessary steps to communicate the Business Policies to all concerned personnel, including the disciplinary procedures that will be applicable in the case of violations. This has been done through Training / Awareness Programs.
2. DIAMOND UNIVERSE LLC ensures that no practice or conduct is engaged in, that brings the diamond Industry into serious disrepute, including but not limited to the following:

* Any activity that results in a material criminal conviction
* Adherence to the Business Policies document
* Buying and trading polished diamonds from areas where this would encourage or support conflict and human suffering.
* Practices which intentionally or recklessly endanger or harm the health and welfare of individuals
* Non-compliance with international best practice and the related regulatory framework with respect to environment
* Any conduct that seeks to deceive, mislead, cheat or delude the consumer including
  + Any undeclared or misrepresented trade in diamonds, treated diamonds, wholly or partially synthetics or stimulants.
  + Any trade misrepresenting the color, clarity, carat, cut and provenance of a diamond, treated diamond or synthetic
* To ensure commitment to the ethical standards defined and adopted by DIAMOND UNIVERSE LLC, the following initiatives have been implemented: The Directors of DIAMOND UNIVERSE LLC shall furnish an annual declaration for the financial year
* That they have not been involved in any activity that has resulted in a material conviction or penalty imposed by regulatory authorities in the preceding financial year.
* That they have not been involved in any activity that has brought the diamond industry into serious disrepute in the preceding financial year.
* That they have not consciously or knowingly violated any of the provisions of the DIAMOND UNIVERSE LLC Business Policies in the preceding financial year.

In case, any such person has indulged in any such activity resulting in conviction or penalty, for which no appeal is pending, such person shall inform authorized person and he may take appropriate measures, including removal of such persons as a Director.

Violations of DIAMOND UNIVERSE LLC Business Policies and engaging in activity that brings the diamond industry into disrepute will also result in appropriate disciplinary action.

* DIAMOND UNIVERSE LLC is committed to transparent disclosure to all stakeholders of all material conviction / penalties imposed by Government, industry or other regulator; by way of acceptable means of internal and external communication.

**1.2.1 Policy and Implementation (Commitment): COP-2**

The Company is committed and responsible to demonstrate best business practices both internally to employees and externally to all business Directors and stakeholders. The company believes in compliance with all applicable law, fair and responsible practices in all business activity including compliance with RJC COP 2024/LGMS.

**1.2.2 Policy on (Commitment – Policy and Implementation)**

We the management of the Company firmly believes to conduct our business with honesty and integrity and in accordance with the highest legal and ethical standards.

The Company ensures that the accounting and financial transaction shall accurately and fairly reflect and in accordance with the General acceptable accounting standards, applicable rules and regulation, accounting practices and policies.

The Company policy requires Directors, employees and other stakeholders to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Directors, employees and other stakeholders must practice fair dealing, honesty and integrity in every aspect of dealing with other external parties, the business community, shareholders, customers, suppliers and government authorities

No false or misleading statements, written or oral, shall be made to any internal-employees or external-business Directors or stakeholder with respect to the company company's compliance with applicable law, rules and regulations.

The Company shall always comply with the industry norms and the guideline of Kimberly Process certification scheme, World diamond Council, WFDB.

All persons shall be treated with dignity and respect and they shall not be unreasonably interfered with in the conduct of their duties and responsibilities.

We are committed to human dignity, human rights, and fairness in our employment practices, non-discrimination policies, minimum age requirements, fair compensation policies, and our policies on health, safety, and security for our employees.

The internal audit activity will review management’s processes for ensuring compliance with this policy and will determine compliance with the policy as part of its audit and review process.

All stakeholders, business Directors and employees are requested to report any situations or incidents that could lead to the non-compliance of the applicable rules and regulation or breach of the policy. Report all such situations to the Directors of the company or Compliance officer as soon as they come to their attention.

We will provide a safe workplace and protect the environment. We will promote the health and well-being of company employees.

**1.2.3 Management Commitment**

a. The company is committed to the fundamental values of integrity, transparency and accountability and aims to create and maintain a trust-based and inclusive internal culture in which non-compliance and breach of applicable rules and regulation is not tolerated. The company is fully committed to adopt best practices and provide a framework for good business practices and risk management strategies for countering unethical practices.

b. The company is committed to work with the employees to adopt more stringent internal controls, ethics and compliance programmes and measures to prevent and detect unethical business practices.

**1.2.4 System and Procedure:**

1. Wherever applicable, in each of the company, a Compliance Officer has been appointed who reports to the Governing Board of the company.
2. The company has carried risk assessment for relevant operations of the Company to determine the risks of non-compliances and unethical practices with reference to the country of operation, business sectors, business practices and relevant laws.
3. Elimination and mitigation methods have been developed for business practices with the risk, in line with the company’s policy on commitment. Such mitigation methods have been validated with employees by feedback review.
4. The commitment policy and procedure has been developed, documented and communicated to all employees and relevant interested parties.
5. The Compliance officer is responsible to conduct periodic internal audits of the system to ensure that the policies and procedures are being followed. The results of the internal audit provide information for review of the systems and procedures. The system shall also review renewed situations posing dangers of best practices and changes in law, to recommend improvements to current practices and/or business principles.
6. Periodic training shall be carried out to sensitize employees and interested parties with the company’s commitment policies and procedures
7. A feedback mechanism wherein employees and interested parties including suppliers & subcontractors can submit their concerns/reports related to incident or event of non- compliance or breach of commitment policy and procedure, without fear of retaliation has been established. The feedback mechanism provides for investigation of reports and appropriate actions as warranted.
8. Confidentiality of the employees/interested parties reporting shall be maintained by the company to dissuade any adverse action or retaliation.

**1.3.1 Reporting: COP 3**

The company ensures compliance with the reporting requirement pertaining to Responsible business practices. Through reporting the company shall communicate about implemented business practices and its compliances pertaining to RJC COP 2024.

**1.3.2 Policy on Reporting**

The company is committed to identify relevant issues pertaining to Responsible business practices and RJC code of practice which can disrepute industry or can be concern for the interested parties and business Directors.

The company shall do the due diligence process to check the compliance of the General requirement, Responsible Supply chain and Human Rights, Labour rights and working conditions, Health, Safety and environment, other financial and Kimberly process certification scheme and world diamond council system of warranties related requirements.

The company shall establish mechanism for the communication of such reporting practice through personal interaction with relevant business Directors.

The company shall identify relevant issues for the improvement and prepare action plan and take necessary action for the compliance of concern issues of RJC COP.

The company is committed to share relevant qualitative information to the interested parties, where any non-compliance issues are observed.

The company shall ensure effective implementation of plan for any non-compliance pertaining to Responsible business practices.

**1.3.3 Management Commitment:**

The company is committed to implement the flexible and practical approach for the implementation of reporting for responsible business compliances. Companies must follow a generally accepted reporting framework for financial reporting and other relevant business practices.

**1.3.4 Systems and Procedure:**

The company shall appoint RJC compliance officer to ensure compliance pertaining to reporting.

RJC compliance officer shall identify interested parties relevant issued pertaining to business practices and compliance with RJC COP 2024.

The company shall implement the effective communication method to communicate with the interested business Directors about reporting and relevant issues of business practices.

The company shall prepare the effective plan and monitor implementation for any issues found not following responsible practices.

The company shall adopt a flexible, practical approach to the form and content of the report /communication, taking into accounts the scale and impacts of the business.

**1.4.1 Financial Accounts: COP 4**

The company commits to prepare financial accounts in accordance with a recognized accounting standard, provide outside parties, such as investors, creditors, regulators, suppliers and other stakeholders, with financial information.

**1.4.2 Management commitment:**

The financial accounting shall be done based on generally accepted accounting principles (GAAP) of the applicable jurisdiction, which are typically issued by a national standards setting body (such as the Financial Reporting Standards Board for the United States), or by the International Financial Reporting Standards (IFRSs), issued by the International Accounting Standards Board.

**1.4.3 Policy Statement on Financial Accounts:**

The company shall annually undertake a financial audit, or financial review in jurisdictions where permitted, by an independent qualified accountant.

The company shall maintain financial accounts of all business transactions in accordance with national or international accounting standards.

The management of a company shall responsible for preparing the financial statements, which should be carried out with the oversight of a qualified accountant.

The company shall train the relevant employees on the applicable law and the Generally Accepted Accounting Principles (GAAP) for the jurisdiction in which they operate.

The company shall ensure that auditors or reviewers must be independent, in accordance with applicable regulations and professional standards.

The audit or review process provides an opportunity for company management to identify and address risks that could lead to material misstatements in the financial statements, including fraud.

**1.4.4 System and Procedure:**

The company shall appoint qualified and independent auditor/reviewer for the audit/review of the financial statement of the company. The appointment of the financial auditor shall be done as per applicable relevant law of the land.

The company shall appoint financial auditors/reviewers through formal appointment letter stating roles and responsibility of the financial auditor and its independence. Similarly, the financial auditor has to accept its appointment and declare his independence as firm and individual.

The company shall get the signed financial information, typically in four basic financial statements - balance sheet, income statement, earnings statement, and cash flow statement - in addition to notes to the statements.

**D: Responsible Supply**

**Chain and Human Rights**

**1: Business Directors**

**2.1.1 Business Directors COP 5**

### DIAMOND UNIVERSE LLC will consider Risks related to business ethics, human rights, and social and environmental business practices of significant Business Directors in the Diamond supply chain, which have the potential to impact the DIAMOND UNIVERSE LLC has own practices arising from such business relationships. Based on this Risk Assessment, DIAMOND UNIVERSE LLC will use their best endeavors, commensurate with their ability to influence, to promote responsible business practices among their Business Directors

**2.1.2 Systems and Procedures**

* + DIAMOND UNIVERSE LLC has identified specific personnel who will be responsible on an overall basis for ensuring adherence with respect to the requirements laid down in the Diamonds’ RJC standard.
  + Some of the systems and procedures in place for monitoring compliance to specific requirements of the RJC standard have already been detailed in the relevant sections of this document.
  + To monitor compliance on an overall basis, DIAMOND UNIVERSE LLC has appointed compliance officer that will review the adherence to systems and policies laid down, by DIAMOND UNIVERSE LLC, in line with the RJC requirements.
  + The company will be self-assessed once in a year as per a pre-defined time schedule.
  + The compliance officer will submit a report to the senior management, highlighting areas of non-compliance, improvement areas and changes to systems / policies (if required).
  + The management of the company will take on the responsibility of defining an Action Plan based on the Report and ensure that the suggested corrective actions / improvements / changes are implemented within a reasonable time period as agreed with the Team.
  + DIAMOND UNIVERSE LLC may also from time-to-time engage external consultants to audit the adherence to various systems and policies followed by the company in line with the RJC requirements.

**2.1.3 Financial Reporting and Appointment of Auditors**

* 1. The annual books of accounts of company are maintained and audited independently by a qualified auditor as per applicable laws / regulations and acceptable accounting standards in USA to ensure that the appointment of auditors is free of any bias or influence, the following systems and procedures are adopted:
* Appointment of auditors for company is governed by the applicable regulations and guidelines in USA where the company is incorporated. Before appointment of the auditor:
  + An undertaking with respect to ‘compliance / qualification’ to audit the company’s book of accounts is obtained from the audit firm
  + Nominated personnel in the company independently verify the applicable regulations / guidelines and inform the management of any non-conformity.

A formal appointment is sent out to the auditor firm confirming their appointment/continuation

**2.1.4 Compliance Monitoring**

1. DIAMOND UNIVERSE LLC has implemented necessary steps to communicate the Business Principles to all concerned personnel, including the disciplinary procedures that will be applicable in the case of violations. The specific procedures adopted for internal communication include:

* Circulation of the Code of Conduct in English and other local languages
* Training / Awareness Programmes.

b. The Management of DIAMOND UNIVERSE LLC ensures that no practice or conduct is engaged in, that brings the diamond Industry into serious disrepute, including but not limited to the following:

* Any activity that results in a material criminal conviction.
* Adherence to the RJC Policies and Procedure document.
* Buying and trading polished diamonds from areas where this would encourage or support conflict and human suffering.
* Practices which intentionally or recklessly endanger or harm the health and welfare of individuals.
* Non-compliance with international best practice and the related regulatory framework with respect to environment
* Any conduct that seeks to deceive, mislead, cheat or delude the consumer including
  + Any undeclared or misrepresented trade in diamonds, treated diamonds, wholly or partially synthetics or simulants;
  + Any trade misrepresenting the colour, clarity, carat, cut and provenance of a diamond, treated diamond or synthetic

1. To ensure commitment to the ethical standards defined and adopted by DIAMOND UNIVERSE LLC, the following initiatives have been implemented:

* The Directors of the DIAMOND UNIVERSE LLC shall furnish an annual declaration for each financial year.
* That they have not been involved in any activity that has resulted in a material conviction or penalty imposed by regulatory authorities in the preceding financial year.
* That they have not been involved in any activity that has brought the diamond industry into serious disrepute in the preceding financial year.
* That they have not consciously or knowingly violated any of the provisions of the DIAMOND UNIVERSE LLC business Principles in the preceding financial year.

In case, any such person has indulged in any such activity resulting in conviction or penalty, for which no appeal is pending, such person shall inform the Management forthwith and the management may take appropriate measures, including removal of such persons as a Director.

Violations of the DIAMOND UNIVERSE LLC Business Principles and engaging in activity that brings the diamond industry into disrepute will also result in appropriate disciplinary action as decided by the management.

DIAMOND UNIVERSE LLC is committed to transparent disclosure to all stakeholders of all material conviction / penalties imposed by Government, industry or other regulator; by way of acceptable means of internal and external communication.

**2.1.5 Policy Statement- Human Rights-COP 6**

The policies relating to this section are part of the Business Policies adopted by DIAMOND UNIVERSE LLC and is presented below for reference:

1. All employees in DIAMOND UNIVERSE LLC will be treated with equality, respect and dignity.
2. DIAMOND UNIVERSE LLC believes in and respects the fundamental human rights according to the United Nations Universal Declaration of Human Rights.
3. DIAMOND UNIVERSE LLC will not interfere in the right of employees to observe tenets or practices based on caste, race, national origin, gender, religion, disability, union membership, or political affiliation.
4. DIAMOND UNIVERSE LLC strongly discourages any form of sexually coercive, threatening, abusive or exploitative behavior.
5. Any reported incidents relating to direct or indirect physical, sexual, racial, religious,  
   psychological, verbal, or any other form of harassment or abuse, or any other form of intimidation or degrading treatment will not be tolerated by the Company.
6. Security personnel, if employed by DIAMOND UNIVERSE LLC are trained to respect the human rights and dignity of all people and use of minimum force proportionate to the perceived threat.
   * 1. The above policies on human rights have been communicated to all employees. The management encourages all employees to report any form of human rights violation and is committed to investigating the issue and initiating corrective action.
     2. DIAMOND UNIVERSE LLC does not employ any security staff.
     3. The Company ensures that it does not enter into any business transactions with suppliers / customers, when it has ‘prior information’ of human rights violation by company. Human trafficking is the recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Human trafficking can lead to forced labour.

**2.1.8 Policy:**

The company firmly believes in strict compliance of human rights and freedom of the human being. All the employees are never forced to do any inhuman act and they are free to select their employees and company at any time they wish to change the job.

The company shall never violate the provision of universal declaration of human rights.

**2.2 Conflict-Affected Areas-Due Diligence for Responsible Sourcing-CAHRA COP 7**

Conflict Areas means armed aggression, widespread violence, and/or widespread human rights abuses.

Conflict-Affected Areas are areas where Conflict is prevalent. The area may be a region, a country, an area within a country, or an area that crosses one or more country boundaries. Operations are not necessarily complicit in Conflict if they are located in a Conflict-Affected Area.

These can include:

* Any forms of torture, cruel, inhuman and degrading treatment.
* Any forms of forced or compulsory labour, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily.
* The worst forms of child labour.
* Other gross human rights violations and abuses such as widespread sexual violence.
* War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide

**2.2.1 Management Commitment:**

The company ensures that any diamond procurement shall be done from the non-conflict areas and the company is committed not to contribute to the conflict area through their business practices.

**2.2.2 Policy on Conflict – Affected Areas:**

The company shall monitor the Conflict-affected areas and shall not contribute through their business practices. Identification of conflict areas shall be done by the presence of armed conflict, widespread violence or other risks of harm to people. Some of the worst human rights abuses involving business occur amid conflict over the control of territory, resources or a government itself, where the human rights regime cannot be expected to function as intended.

The company shall aware relevant employees on the same and shall not deal with the conflict areas.

The Companies shall ensure that they do not contribute to conflict, either through their own activities or directly linked to their operations, products or services through their business relationships.

The company, if operating in, or sourcing Diamonds directly from, a Conflict-Affected Area, shall use the Human Rights due diligence process to assess the heightened Risks of adverse Human Rights impacts.

**2.2.3 Systems and Procedure**

The compliance officer shall verify each purchase and sales of polished diamonds to ensure that company is not dealing with the conflict affected areas.

The company shall identify any relevant conflict-affected areas where you may have operations or direct suppliers. If you are unsure whether you operate in or source from any conflict-affected areas, the company shall cross verify the same from various sources like.

* UN Security Council Resolutions. Note if any international sanctions apply, it may not be possible to operate in accordance with Applicable Law.
* UN Peacekeeping Operations.
* US State Department “Conflict Minerals Map” and associated reports required by the Dodd-Frank Act.
* US State Department Country Reports on Human Rights Practices

**2.2.4 Due Diligence for Responsible Sourcing from Conflict-Affected and High-Risk Areas**

**Background**

The Company shall carry out due diligence to assess risks related to procurement from the Conflict-affected and high-risk areas - CAHRAs. The company firmly believes any business relationship with the company having risks include gross human rights violations, torture, forced or compulsory labor, war crimes, support to non-state armed groups, public or private security forces who illegally control mine sites, bribery and fraudulent misrepresentation of the origin of minerals, money laundering and non-payment of taxes. The company shall carry out due diligence process for minimizing a company’s exposure to these risks when sourcing minerals. We as a company believes due diligence provides the information to help drive performance in supply chains by supporting engagement with suppliers and the adoption of mitigation measures. The company shall use due diligence to inform their decision making in risk management.

The Company shall carry out due diligence to assess Conflict-affected and high-risk areas (CAHRAs) are identified by the presence of armed conflict, widespread violence (including violence generated by criminal networks) or other risks of serious and widespread harm to people. Armed conflict may take a variety of forms, such as conflict of international or non-international character, which may involve two or more states, or may consist of wars of liberation or insurgencies, civil wars, etc. High-risk areas may include areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure and widespread violence. Such areas are often characterized by widespread human rights abuses and violations of national or international law.

**2.2.5 Policy and Procedure -**

This policy confirms DIAMOND UNIVERSE LLC’s commitment to respect human rights, avoid contributing to the finance of conflict and comply with all relevant UN sanctions, resolutions and laws.

DIAMOND UNIVERSE LLC is a certified member of the Responsible Jewellery Council (RJC). As such, we commit to proving, through independent third-party verification, those we:

* respect human rights according to the Universal Declaration of Human Rights and International Labor Organization Fundamental Rights at Work.
* do not engage in or tolerate bribery, corruption, money laundering or finance of terrorism.
* support transparency of government payments and rights-compatible security forces in the extractives industry.
* do not provide direct or indirect support to illegal armed groups; and
* enable stakeholders to voice concerns about the jewelry supply chain.
* 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.

**2.2.6 Regarding serious abuses associated with the extraction, transport or trade of diamonds/colored gemstones:**

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

* Torture, cruel, inhuman and degrading treatment.
* Forced or compulsory labor.
* The worst forms of child labor.
* Human rights violations and abuses; or
* War crimes, violations of international humanitarian law, crimes against humanity or
* Genocide.

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

We only sell or purchase diamonds/colored gemstones 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/colored gemstones from, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates who illegally:

1. control mine sites, transportation routes, points where diamonds/coloured gemstones are traded and upstream actors in the supply chain; or
2. 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.

**2.2.8 Regarding public or private security forces:**

We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of diamonds/colored gemstones, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of diamonds.

**2.2.9 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/colored gemstones.

**2.2.10 Procedure**

The company has appointed senior manager and current compliance officer has been assigned responsibility for ensuring supply chain compliance.

The compliance officer shall carry out due diligence and risk assessment with respect to procurement of minerals or metals from the Conflict-affected and high-risk areas and suppliers involved in unethical business practice and anti-social activities at regular interval but at least once in a year.

The management of the company and compliance officer shall train relevant employee to ensure compliance with OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

The company has a grievance system and business Director can register the grievance through contact details mentioned in the invoice of the company or through contact details available on company’s website.

The company shall carry our review of its risk assessment once in year and wherever possible high or medium risked supplier if identified shall be immediately replaced and reported at appropriate level internally and externally.

The company shall communicate to its supplier at regular interval and also verify details of the supplier in public domain.

The company shall carryout risk assessment on OECD due Diligence and responsible supply chains and maintain records of risk assessment.

Diamond Universal LLC communicates this sourcing policy to our suppliers and customers and makes it publicly available for review.  Additionally, Diamond Universal LLC requires the customer to acknowledge the policy and commit to providing information, documentation, and accommodations for site visits as necessary to complete our due diligence as outlined in our basic due diligence and enhanced due diligence policies.

If Diamond Universal LLC should discover, through its ongoing due-diligence that our customer is engaging in suspect practices or practices do not meet our responsible sourcing requirements, we would immediately suspend sourcing from the identified supplier and develop a plan to mitigate the identified risks.  Should the mitigation fail to resolve a matter to our satisfaction or we uncover activities which indicate extreme abuses, dishonesty, or situations where a supplier is unwilling to assist in our due-diligence, Diamond Universal LLC will immediately discontinue any activity with that entity.

Diamond Universal LLC is also committed to be audited by an independent third party to ensure adequate testing of the system to ensure that the verification and documentation process is secure.  Through these audits, Diamond Universal LLC displays transparency, and our customers gain audit-based assurance that Diamond Universal LLC’s supply chain due diligence policy is verifiable and effective.

The company shall review this policy on yearly basis or if there is a changed in sourcing practices.

**2.3 Sourcing from Artisanal and small-Scale mining- COP 8**

Artisanal and Small-Scale Mining (ASM) are formal or informal operations with predominantly simplified forms of exploration, extraction, processing and transportation. ASM is normally low capital intensive and uses high labor-intensive technology.

ASM can include men and women working on an individual basis as well as those working in family companies in Directorship or as members of cooperatives or other types of legal associations and enterprises involving hundreds or thousands of miners.

**2.3.1 Management commitment:**

We feel, we are responsible to respect human rights and apply due diligence, through company sourcing directly from ASM producers. The companies with direct sourcing relationships are in the best position to assess risks and, as customers, to work directly with their suppliers to provide for or cooperate in remediation of identified impacts wherever possible.

**2.4 Policy on Sourcing from Artisanal and small-Scale mining-COP 9**

The company upon source Diamonds, Gold and/or Platinum Company Metals directly from ASM producers that are not under the Control of the company shall:

Regularly assess Risks of Forced Labor, Worst Forms of Child Labor, unsafe working conditions, uncontrolled mercury use, and other significant environmental impacts, and

Use best endeavors to positively influence practices and reduce or avoid the Risks and provide for or cooperate in remediation of adverse human rights and environmental impacts.

If the ASM suppliers are located within the area of operation of a company with mining facilities, the company should identify risks, and conduct efforts to reduce or avoid risks, as an integral part of its community engagement program and impact assessments and risk mitigation planning.

If the ASM suppliers are located in a different area from the company, the company should conduct due diligence appropriate to the circumstances to identify potential risks. Due diligence measures could be conducted in-house and/or use professionals with local experience and should include site visits.

If a company is sourcing directly from ASM producers, the company should confirm that the ASM producers are operating legally or make best efforts to support the legalization of the ASM producers. Legalization may happen in a range of ways, including:

The ASM producers themselves meet the requirements of local law and register independently, if that law is appropriate to producers in the ASM sector.

If local law permits, the company could enter into an agreement with the ASM producers operating in the company’s permit area that allows the ASM producers to work on the land of the company.

A policy needs to be developed, which should be done in collaboration with ASM producer.

**2.4.1 System and Procedure**

The company should identify the risk with following practices and procedures.

The mechanism of Monitoring of site conditions and practices, potentially via site visits by the company or its representatives.

The company shall form training and other forms of technical assistance and advice to improve working conditions and reduce impacts, particularly with respect to the use of mercury, environmental management, and health and safety.

Capacity-building measures, such as support for community health and educational projects, and community education on forced and child labor issues.

Financial incentives, where appropriate, to encourage and facilitate improvements to site conditions and practice.

**2.5 Policy Statement-Community Development- COP10**

The policies relating to this section are part of the Business Policies adopted by DIAMOND UNIVERSE LLC and are presented below for reference:

DIAMOND UNIVERSE LLC is committed to the development of communities where it operates, contributing to their social and economic welfare.

DIAMOND UNIVERSE LLC actively participates in different types of community development programs organized by the diamond trading fraternity in the respective country of operation.

**2.6 Policy Statement-Bribery and Facilitation Payments-COP 11**

The policies relating to this section are part of the Business Policies adopted by DIAMOND UNIVERSE LLC and are presented below for reference:

a DIAMOND UNIVERSE LLC is committed to prohibit bribery in all business practices and transactions that are carried out by the company or on its behalf by business Directors. The company will not offer, accept or countenance any payments, gifts in kind, hospitality, expenses or promises as such that may compromise the principles of fair competition or constitute an attempt to obtain or retain business for or with, or direct business to, any person; to influence the course of the business or governmental decision –making process.

b. DIAMOND UNIVERSE LLC considers Bribery Risk as it applies to its organization (including agents) to identify which areas pose high risks. DIAMOND UNIVERSE LLC has developed appropriate methods to monitor conduct of employees and agents and eliminate bribery based on this understanding.

c. The management of DIAMOND UNIVERSE LLC facilitates the reporting of incidences of attempted bribery or inappropriate gifts within their organization and shall apply appropriate sanctions for bribery and attempted bribery in all forms.

d. DIAMOND UNIVERSE LLC ensures that no employee will suffer demotion, penalty or other adverse consequences for voicing a concern, or for refusing to pay a bribe or facilitation payment even if this action may result in the enterprise losing business.

**2.6.1 Management Commitment**

1. The management has appointed as the Compliance Officer (CO) for DIAMOND UNIVERSE LLC.
2. DIAMOND UNIVERSE LLC is committed to the fundamental values of integrity, transparency and accountability in which bribery and facilitation payment is not tolerated.
3. This includes identification of “direct or indirect” means of bribery (or attempts to bribe) within its operations, in direct contact with third parties and bribery and facilitation payments carried out through agents and intermediaries.
4. DIAMOND UNIVERSE LLC has identified applicable national and international legislations/regulations relating to prevention of bribery and facilitation payments, to comply with.
5. DIAMOND UNIVERSE LLC shall periodically review policies and approach on bribery and facilitation payments. It is committed to provide effective channels for employees to report suspected bribery and facilitation payment in the Company, and for protecting whistleblowers from retaliation.
6. DIAMOND UNIVERSE LLC is committed to work with the employees to adopt more stringent internal controls, ethics and compliance programs and measures to prevent and detect bribery.

**2.6.2 System and Procedure:**

* 1. DIAMOND UNIVERSE LLC has carried risk assessment for relevant operations of the company to determine the risks of bribery.
  2. Elimination and mitigation methods have been developed for business practices with the risk of bribery, in line with the company policy on bribery.
  3. An AML / CFT / Anti-Bribery document (Ref Doc No DUL-AMU-002) has been developed and communicated to all employees.
  4. A review system has been established to monitor the implementation of identified practices of the anti-bribery-facilitation payment program. The system shall also review renewed situations posing dangers of bribery and facilitation payment, best practices and changes in law, to recommend improvements to current practices and/or business Policies.
  5. Periodic training shall be carried out to sensitize employees and interested parties with the company anti-bribery-facilitation payment policies and procedures
  6. A feedback mechanism wherein employees and interested parties including suppliers & subcontractors can submit their concerns/reports related to suspected bribe and inappropriate gift requests, without fear of retaliation has been established. The feedback mechanism provides for investigation of reports and appropriate actions as warranted.
  7. Confidentiality of the employees/interested parties reporting bribery/facilitation payment shall be maintained by the company to dissuade any adverse action or retaliation.

**2.6.3 Policy Statement-KYC, Money Laundering & finance of terrorism-COP12**

The policies relating to this section are part of the Business Policies adopted by DIAMOND UNIVERSE LLC, and are presented below for reference:

1. DIAMOND UNIVERSE LLC recognizes the fact that company in the gems and jewelry sector have to take on the onus of analyzing their potential vulnerabilities to money laundering and implement specific steps that are required for protection against abuse by criminals.
2. Strict compliance is required at all times, with all applicable national and, where appropriate, international laws / regulations with respect to money laundering, terrorism financing, bribery, corruption, smuggling, embezzlement, fraud, racketeering, transfer pricing and tax evasion.
3. DIAMOND UNIVERSE LLC shall act in accordance with national laws and national / international accounting standards with respect to maintaining financial accounts of all business transactions and auditing of its financial accounts.
4. DIAMOND UNIVERSE LLC ensures that concerned employees know and understand the relevant regulatory jurisdiction for national and international transactions, money laundering / financial offences related legal, regulatory and internal requirements as they apply to their jobs. Ignoring or not reporting suspicious activity that appears to be questionable may also is considered as a violation of the Business Policies, depending on the seriousness of the non-conformance.
5. DIAMOND UNIVERSE LLC implements a “Know your customer” and “Know your Supplier” procedure that establishes the id company of all organizations with which it deals, have a clear understanding of their business relationships and have a reasonable ability to identify and react to transaction patterns appearing out of the ordinary or suspicious.

**2.6.4 Management Commitment**

1. DIAMOND UNIVERSE LLC is fully committed to combating all forms of activities relating to money laundering, terrorism financing and other financial offences.
2. DIAMOND UNIVERSE LLC has identified the applicable national and international legislations / regulations relating to money laundering, terrorism financing and other financial offences, which must be complied with.
3. As a part of the annual statutory audit program, the independent financial auditors of DIAMOND UNIVERSE LLC are made aware of the applicable laws relating to money laundering, terrorism financing and financial offences.

To review and assess the adequacy of and level of compliance with the company Anti Money Laundering/ CFT Program, periodic internal audits are conducted. This audit is conducted by respective

1. Compliance officer of DIAMOND UNIVERSE LLC.
2. The systems and procedures followed for appointment of auditors are detailed in Section 1.1.3 (Part C) of this document.

**2.6.5 Systems and Procedures**

1. DIAMOND UNIVERSE LLC has implemented ‘Know Your Customer’ and ‘Know Your Supplier’ programs for purchase and sale of polished diamonds.

No business transaction, over US$ 10,000 or equivalent is entered into with any supplier or customer, unless a formal verification process of the id company (of supplier or customer) is completed. For regular customers and suppliers of the company the verification process is conducted (updated) annually.

1. The management has appointed Financial Compliance Officer of DIAMOND UNIVERSE LLC who is responsible to ensure that all the applicable regulations with respect to reporting cash and non-cash equivalents to the relevant Regulatory Bodies are fully adhered to.
2. To ensure traceability of its financial transactions, DIAMOND UNIVERSE LLC follows a policy of maintaining all relevant documents for a minimum period of five years as required by National regulations.
3. The Compliance Officer of the company is responsible for maintaining and regularly updating a list of suspicious transactions that may be categorized as ‘red flags’ i.e. transactions that may be designed to facilitate money laundering or terrorist financing
4. On detection of a

‘Red flag’, the Compliance Officer of the company is responsible for Verifying the same and if required, reporting the ‘red flag’ to appropriate regulatory authorities.

In the event of reporting of a ‘red flag’ to regulatory authorities, the Compliance Officer will initiate the following steps:

* Inform all the concerned personnel that all transactions with the particular supplier or customer should be immediately suspended until further notice.
* To prevent use, ensure that all stock material lying with the company (in case of supplier) are collected and stored separately in safe custody.
* Stop payment (wherever possible) of all in-process financial instruments.
* Inform the concerned supplier or customer, that the company has taken the above steps as required by applicable legislations / regulations.
* Based on feedback obtained from regulatory authorities, decide whether normal transactions should be suspended permanently or can be commenced with or without restrictions.
  1. The Compliance Officer is responsible for checking specific Government lists of individuals, terrorists, and countries that are categorized as ‘high risk’ for business transactions. A listing of various such data sources that are regularly tracked is maintained.

**2.6.6 Training of Personnel**

1. The Compliance Officer is responsible to identify the personnel (depending on their job responsibilities) who are required to be familiar with all aspects relating to combating money laundering, terrorism financing and other financial offences.
2. The above personnel are required to undergo a training program on the AML/CFT/Anti-Bribery policies and procedures of the company.
3. In addition to the above formal programs, the Compliance Officer

Also ensures that relevant information updates are communicated to concerned personnel by way of internal memos or electronic mail.

**2.7 Policy Statement- Product Security COP 13**

a. DIAMOND UNIVERSE LLC is committed to establish and implement product security measures within the premises and during shipments to protect against product theft, damage or substitution.

b. The security and wellbeing of employees, visitors and other relevant business Directors is prioritized when establishing product security measures.

c. All products sold by DIAMOND UNIVERSE LLC to consumers shall comply with applicable regulations of product health and safety.

* + 1. **Systems and Procedures**

1. DIAMOND UNIVERSE LLC has carried out a risk assessment of all its activities for susceptibility to product theft, damage or substitution. Identified risks have either been eliminated or mitigation systems have been put into place.
2. DIAMOND UNIVERSE LLC have identified the processes wherein security risk of the product due to theft / damage / switching can occur. For each stage and risk involved, appropriate controls have been laid down to address product security. The stages, risks and controls are as follows:

| **Sr. No.** | **Operational Stage** | **Risk** | **Control** |
| --- | --- | --- | --- |
| 1 | Goods transported from supplier to our premises | Theft | * Goods are insured by the supplier / company. |
| 2 | Goods receipt from supplier | Theft | * Check weight against supplier document * Weight verification done under close supervision of senior management personnel * CCTV coverage of receipt area * In case of variation, take up with courier / supplier / insurance agency |
| 3 | Goods storage | Theft | * Store in strong rooms, lockers * Limited access of persons to such strong rooms, lockers * Keys with designated senior management staff |
| 4 | Preparing packets for further issue | Theft | * Limited access of persons for such preparation * Checking of weights of each packet and tallying with total weight * Lot Number and Weight of each packet mentioned on the packet * Weight of each packet entered into the computer system * Store such packets in strong room / locker till they are issued * CCTV coverage |
| 5 | Inspection of Goods by potential customers and finalization of sale | Theft  Substitution | * CCTV Coverage * Supervision of sales person |
| 6 | Packing and preparation of documents | Theft  Substitution | * CCTV Coverage * Supervision of sales person * Providing accurate information to accounts for raising invoices |
| 7 | Handing over goods to customs / Dispatch of goods | Theft | * Through authorized security agencies * Insurance |

1. All concerned employees have been trained on the above procedures. It has been conveyed to all employees that their lives are more important than the product.
2. DIAMOND UNIVERSE LLC have ensured a review process wherein in case of any changes to the processes or introduction of new process that may impact the risk of theft, damage or substitution, adequate measures are implemented.
3. The company solicits customer requirements on applicable regulations of product health and safety in the order finalization stage.

**3.1 Provenance Claim- COP 14**

**3.1.1 Policy Statement**

The policies relating to this section are part of the Business Principles adopted by DIAMOND UNIVERSE LLC and are presented below for reference:

1. “The company shall ensure all its Provenance Claims made will be fully valid along with available evidence to support the Claim(s)”

**Origin** - Geographical origin of material, for example country, region, mine or corporate ownership of the Mining Facility/ies; and/or

**Source** - Type of source, for example recycled, mined, artisanally mined, or date of production; and/or

**Practices** - Specific practices applied in the supply chain relevant to the Code of Practices, including but not limited to, standards applicable to extraction, processing or manufacturing, conflict-free status, or due diligence towards sources.

Provenance Claims may also relate to origin, sources or practices that are specifically excluded from the supply chain, such as through a ‘negative warranty’.

1. The company shall ensure that all claims and statements (made to consumers or other businesses) on practices in the supply chain and the origin or source of Diamonds, Synthetics, Gold and/or Platinum through the use of both descriptions and symbols are valid.
2. The company shall ensure that there will be no attempt to mislead consumers through illustrations, descriptions, expressions, words, figures, depictions or symbols relating to the Provenance Claim(s)
3. The company shall ensure that all the relevant employees are aware about the provenance claim and it procedures

**3.1.2 Management Initiatives**

In line with the Provenance claims Requirement, the Company has implemented the following initiatives:

The Company is committed to ensuring that all the company, are fully compliant with the requirement of the Provenance claim of Responsible Jewellery Council.

A statement that the Provenance Claims policy will be communicated to all employees through training. Written training procedure, training materials and employee training records. The company shall regularly interact with the relevant employees to explain the requirement of provenance claim.

The company shall prepare Procedures for validating Provenance Claim(s) and maintaining supportive evidence and ensure documented criteria/requirements that consistent with the claim(s).

The company shall ensure the implementation of Complaints or grievance mechanism and information on how to access it. Records of complaints or grievances relating to Provenance Claim(s) are monitored to ensure compliance.

The Claim(s) can be related to the geographical origin of the materials, such as country, mine or corporate ownership of the Mining facility, and also around the source of the materials,

Review the company sales documentation, policies and procedures, training materials and register.

Claim(s) concerning specific practices applied in the supply chain relevant to the Code of Practices, including but not limited to, standards applicable to extraction, processing or manufacturing, conflict-free status or due diligence towards sources would also be considered as Provenance Claims.

**1: General Employment Terms**

**E: Labour Rights and Working Conditions**

* + 1. **Policy Statement-General Employment Terms COP15**

1. DIAMOND UNIVERSE LLC complies with applicable national laws / regulations with respect to employment.
2. DIAMOND UNIVERSE LLC is committed to maintaining appropriate records as stipulated by the regulatory authorities for all staff employed, whether on a full time, part time or seasonal basis.
3. DIAMOND UNIVERSE LLC shall not require workers to work for more than the national limit of hours in a week on a regular basis, with overtime hours not to exceed the national permitted limit per week on a regular basis unless there are legal opt-outs.
4. DIAMOND UNIVERSE LLC shall ensure that wages and benefits for a standard working week shall meet at least national minimum standards and shall be sufficient to meet the basic needs of workers.
5. Wages shall be paid to employees on a regular and predetermined basis in a manner and location convenient to employees, accompanied by a wage slip detailing wage rates, benefits and deductions as applicable.
6. DIAMOND UNIVERSE LLC shall ensure that due process of wage deductions shall be followed where applicable and it shall not be binding on employees to buy provisions from the company.
7. When required, due recognition will be given to the existence, membership and lawful activities of worker representative bodies, and worker representatives will be given access to carry out their responsibilities / functions.
8. DIAMOND UNIVERSE LLC is committed to addressing the legitimate grievances of its employees.
9. DIAMOND UNIVERSE LLC shall follow proper procedure as per law for dismissal of employees, in case the need for the same arises, and arbitrary dismissal procedures shall be avoided.
10. Information regarding applicable employment policies and working practices shall be communicated in a transparent manner to all employees
    * 1. DIAMOND UNIVERSE LLC is fully committed to the pursuance of the provision of fair and conducive employment conditions, consistent with applicable laws and regulations.
      2. DIAMOND UNIVERSE LLC has entrusted the task of maintaining employee records and salary payments to its employees to an external organization.
      3. In addition to the policies defined in the Business Policies and compliance to applicable national employment and labor related legislations / regulations, the following procedures are applicable:

* Employment commences only after an Employment Contract has been handed over to the prospective employee and a written confirmation of the acceptance of terms and conditions of employment is received from the employee.
* Payment and remuneration details are agreed upon before the commencement of employment and specified in the Employment Contract.
* No deductions from salaries or wages will be made as a disciplinary measure.
  + 1. **SUGGESTION BOX:** The Company encourages employees who have suggestions that they do not want to offer orally or in person, to write them down and drop them in the suggestion box provided for the same. If this is done anonymously, every care will be taken to preserve the employee’s privacy. A member of the Executive Staff checks the box on a regular basis.

##### Grievance Procedure – Under normal working conditions, employees who have a job-related problem, question or complaint should first discuss it with their immediate supervisor. At this level, employees usually reach the simplest, quickest, and most satisfactory solution. If the supervisor cannot solve the problem, the company encourages employees to contact the Director whose decision in the matter is final.

The Director of DIAMOND UNIVERSE LLC has communicated the various employment policies and procedures to all the personnel.

**4.1.7** **Staff Meetings:** To ensure transparent and healthy communications between the management and staff / workers, periodic staff meetings are held between the Director and the employees. These meetings are designed to inform employees on recent company activities, changes in the workplace, health / safety issues, and obtain feedback from employees on improvements, problems, etc.

**5.1 Working hours: COP-16**

##### The management of the company believes working hours are a fundamental component of safe and humane working conditions. The normal work week as per applicable law, or any number of fewer normal maximum weekly hours that are set either by national or local law or a collective bargaining agreement.

##### 5.1.1 Management Commitment:

##### We are committed to limiting working hours to promote better work-life balance and reduce workers’ stress-related occupational conditions and accident rates. Weekly rest and paid annual leave are a normal and must be provided.

##### 5.1.2 Policy on Working hours and Remuneration: COP 17

##### The company shall follow the relevant applicable law pertaining to working hours and remuneration.

##### Effective mechanism shall be established to ensure compliance of employment terms and applicable provisions.

##### Overtime work is requested under a voluntary overtime system. Required overtime is permitted only where it is within the limits allowed under Applicable Law or Collective Bargaining Agreements.

##### The sum of the normal work week and overtime hours by Applicable Law or permitted under a Collective Bargaining Agreement.

##### The company shall comply with the working hours, overtime, leave, weekly off and other relevant provisions of applicable law.

**5.1.3 System and Procedure**

The company shall establish effective mechanism to ensure compliance with the relevant applicable law.

The company shall assign responsibility for setting and overseeing remuneration to a senior management function such as human resources.

All the employees shall get their remuneration according to the provision of law and in convenient manner to them.

**6.1 Harassment, discipline, grievance procedures and non-retaliation – COP 18**

SUGGESTION/COMPLAINT BOX: The Company encourages employees who have suggestions/complaint that they do not want to offer orally or in person, to write them down and drop them in the box provided for the same. If this is done anonymously, every care will be taken to preserve the employee's privacy. A member of the Executive staff checks the box on a regular basis.

Procedure and Guideline for Grievance Handling:

The Grievance Procedure will be implemented as follows. The same will be applicable to all the employees irrespective of designation, job profile and management hierarchy.

Step 1 - Immediate Superior

1. In step 1 the employee must discuss his grievance with his immediate superior or the latter’s superior in the event of a grievance against an immediate superior.
2. The superior must Endeavor to solve the problem within Four (4) working days and inform the employee.
3. Should the employee not be satisfied with the outcome, he may proceed to Step 2.

Step 2 - Department Manager/Head

1. The employee can submit written grievance memo with all relevant details to Department Manager/Head.
2. The Department Manager/Head shall Endeavor to solve the problem within Seven (7) working days and inform the employee.
3. Should the employee not be satisfied with the outcome, he may proceed to step 3.

Step 3 - Grievance Hearing

1. The matter is referred to the Main Manager/Works Committee by handing him the grievance memo together with any other further relevant written information.
2. The Main Manager/Works Committee shall convene a grievance hearing, investigate the facts of the grievance and attempt to resolve the matter. Decision of main Manager/Works Committee shall be final.

Procedure for Suggestion/Complain Box.

Suggestion/Complain Boxes are kept at appropriate locations in each entity. Employee can use the facility of suggestion/complain box without hesitation. Identity of the employee on the complain letter will be voluntary. A Grievance Register is maintained, disclosing the date of receipt of complain, name of an employee (if mentioned), particulars of complain received, proceedings of investigation, outcome of investigation and the date of resolving the complaint.

Suggestions from employees on any issue facing them or the entity are welcome. The locations where Suggestion box have to be placed have been identified. Employee can use facility of suggestion box without hesitation. Identity of the employee on the suggestion letter will be voluntary.

**7.1 Policy Statement- Child labor COP19**

1. No form of child labor should be employed DIAMOND UNIVERSE LLC.
2. The minimum age for employment that will be applicable is fifteen (As per ILO Convention No. 138).
3. For authorized adolescents (persons below 18 years of age but above 15 years), the company management is responsible for providing working conditions, hours of work and wages in compliance with applicable local laws as a minimum.
4. If a child is found working at DIAMOND UNIVERSE LLC, either own or subcontracted, the responsibility of rehabilitation will be undertaken by the management.
5. The above policies will also be applicable to subcontracted labor.

To ensure effectiveness of the above policies, DIAMOND UNIVERSE LLC obtains age proof of all its employees at the time of their recruitment.

**8.1 Policy Statement-Forced Labour COP 20**

The policies relating to this section are part of the Business Policies adopted by DIAMOND UNIVERSE LLC and are presented below for reference:

1. The management of DIAMOND UNIVERSE LLC is fully committed to ensuring that forced or involuntary, bonded, indentured or prison labor, is not practiced nor used in any form at any of its facilities. DIAMOND UNIVERSE LLC shall ensure that there is no restriction in the freedom of movement of employees and dependents. Any reported incidents relating to forced labor will be considered as a serious violation of this Business Policies.
2. The following definitions will be applicable:

* The Universal Declaration of Human Rights that states that ‘No one shall be held in slavery or servitude’
* ILO Convention 29, which defines forced or compulsory labor as ‘all work or service which is extracted from any person under the menace of any penalty, and for which the said person has not offered himself voluntarily”

**8.1.1** To ensure effectiveness of the above policies relating to forced or compulsory labor, the following guidelines are applicable to DIAMOND UNIVERSE LLC:

* No employee is required to lodge deposits or id company papers
* All employees are free to resign at any time after serving the required notice period specified in the terms and conditions of appointment.
* Leave is provided to all employees as per applicable national legislation. In the case of emergencies, employees are free to leave their workplace immediately after informing their immediate supervisor.
* Relatives and friends are free to contact the employees by phone and visit them at the workplace in case of emergencies or any other genuine problems.
* Overtime is voluntary and as far as possible is informed to the employee in advance.

**9.1 Policy Statement-Freedom of Association and Collective Bargaining COP 21**

The policies relating to this section are part of the Business Policies adopted by

DIAMOND UNIVERSE LLC and are presented below for reference:

1. DIAMOND UNIVERSE LLC will not prevent employees from associating and collective bargaining
2. Discrimination can mean distinction, exclusion or preference.
3. Any form of discrimination relating to the hiring, discharge, pay, promotion and training of employees on the basis of race, ethnicity, caste, national origin, religion, age, disability, gender, marital status, physical appearance, sexual orientation, HIV status, Migrant status, membership of worker representative bodies, political affiliations, or any criteria that are unlawful is strongly discouraged by DIAMOND UNIVERSE LLC and any such reported incidents will be viewed as a serious violation of this Business Policies.
4. DIAMOND UNIVERSE LLC will ensure that employees who have certain life-threatening diseases or illnesses are not treated differently from other employees, and will continue to employ such personnel, as long as they are physically and mentally fit to attend to their normal job responsibilities.
5. Individuals who are “Fit for Work” shall be accorded equal opportunities and shall not be discriminated against on the basis of factors unrelated to their ability to perform their job.
6. DIAMOND UNIVERSE LLC shall not use corporal punishment under any circumstances and will ensure that employees are not subjected to harsh or degrading treatment, sexual or physical harassment or other forms of mental or physical coercion, abuse or intimidation.
7. DIAMOND UNIVERSE LLC encourages all personnel to voice concerns promptly, if they have a genuine reason to believe that a policy, company operation or practice is or will likely be in violation of any law, regulation or internal company rule or policy, including this Business Policies.
8. DIAMOND UNIVERSE LLC assures all employees who come forward in good faith to report issues, that they will be treated fairly and respectfully. While all efforts will be taken to protect the anonymity of employees as far as practicable, any form of retaliation against any such individuals, assuming they have not been involved in the violation, will not be tolerated.

**10.1 Policy Statement-Non Discrimination COP22**

* The policies relating to this section are part of the Business Principles adopted by DIAMOND UNIVERSE LLC and are presented below for reference:
* "Discrimination can mean distinction, exclusion or preference.
* Any form of discrimination relating to the hiring, discharge, pay, promotion and training of employees on the basis of race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, HIV status, Migrant status, membership of worker representative bodies, political affiliations or any criteria that are unlawful is strongly discouraged by the company and any such reported incidents will be viewed as a serious violation of this Business Principles.
* The company will ensure that employees who have certain life-threatening diseases or illnesses are not treated differently from other employees, and will continue to employ such personnel, as long as they are physically and mentally fit to attend to their normal job responsibilities.
* The company shall at no time condone the use of corporal punishment or other forms of mental or physical coercion
* The company encourages all personnel to voice concerns promptly, if they have a genuine reason to believe that a policy, company operation or practice is or will likely be in violation of any law regulation or internal company rule or policy, including these Business Principles.
* The company assures all employees who come forward in good faith to report issues, that they will be treated fairly and respectfully. While all efforts will be taken to protect the anonymity of employees as far as practicable, any form of retaliation against any such individuals, assuming they have not been involved in the violation, will not be tolerated."

**10.2 Equality, Diversity & Inclusion Policy Statement CoP 23**

* The Company recognizes that we are all unique, whether in terms of our background, personal characteristics, experience, skills or motivations, and the Company value its people for the differences they bring. These differences, this diversity is powerful.
* The Company is committed to building a culture that values openness, fairness, and transparency with a workforce that is truly representative of communities in which it operates and where employees feel respected and able to achieve their potential. Fostering an inclusive culture helps everyone to benefit from a wider range of different perspectives, experiences, and skills. The Company believes that this creates a happier, more productive working environment for all.
* This policy statement applies to anyone working for the Company. This includes employees, workers, contractors, and apprentices. The policy also relates to job applicants and is relevant to all stages of the employment relationship.

**Management Commitment:**

The member shall establish and maintain:

a. A publicly available documented policy endorsed by top management with commitments that promote worker diversity, equity and inclusivity in all levels of the organization and across functions including (but not limited to) recruitment, professional development and mobility, and equitable employment conditions.

b. Supporting processes and procedures with measures to support the policy implementation.

The member shall provide training to its workers that promotes a culture of diversity, equity and inclusivity; the policy commitments; and the supporting systems and procedures.

The member shall review the effectiveness of the diversity, equity and inclusivity policy, processes and procedures, at a frequency appropriate to the purpose, nature, scale and impact of its business operations and at least in line with COP 2.7.

**1: Health and Safety**

**F: Health Safety and Environment**

**11.1 Policy Statement- Health and Safety- COP 24**

The policies relating to this section are part of the Business Policies adopted by DIAMOND UNIVERSE LLC and are presented below for reference:

DIAMOND UNIVERSE LLC recognizes the need to develop a sustainable, value creating business and is committed to the following in the areas of workplace health and safety:

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

**11.1.1** DIAMOND UNIVERSE LLC is fully committed to the pursuance of applicable standards of health and safety, and the provision of a safe and healthy working environment for all its Employees.

* + 1. In DIAMOND UNIVERSE LLC, the responsibility for managing various issues relating to health and safety has been assigned to a responsible management representative.
    2. DIAMOND UNIVERSE LLC maintains a high level of work place hygiene at its offices.

DIAMOND UNIVERSE LLC operates from an office that is part of the building. The building management team is responsible for maintenance and upkeep of the building.

* 1. **.4** DIAMOND UNIVERSE LLC takes care of the following within its premises:
* Provision of a first aid kit
* Provision of firefighting equipment
* Collection and disposal of waste to building management team
* The building management team takes care of, evacuation plans and general maintenance of building.

The company has established an emergency evacuation plan consisting of evacuation layout and emergency alarm. The employees have been trained to raise alarm and evacuation of staff and customers-if any, from the premises. Staff has been told to use staircases in case of fire emergency.

**11.1.5 Policy**

The policies relating to this section are part of the Business Policies adopted by DIAMOND UNIVERSE LLC, applicable to company and are presented below for reference:

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

**11.1.6** DIAMOND UNIVERSE LLC focuses on the following to ensure that the above policy is implemented:

* 1. Conservation of natural resource – paper, electricity, water etc.
  2. DIAMOND UNIVERSE LLC has trained its employees on the above issues.

**12.1 Environment Management Procedure COP 25**

* The Management Representative is responsible for co-ordination of the steps enumerated in this procedure.
* Identify, quantify and analyses the composition of the waste generated by the collective functional area within the facility building.
* Identify wastes that can be recycled or reused at low or no cost
* Determine the locations’ ability to reduce, reuse and recycle material s from the existing waste stream on ago forward basis
* Pin point recycle opportunities
* Enhance and strengthen recycling initiatives currently in place
* Provide the foundation for a waste reduction work plan
* Encourage workers and supplier and raise awareness to reducing plastic waste
* Evaluate compliance with regulatory requirements
* Identify emerging issues regarding waste
* Install special bins that are properly labeled for hazardous waste. This avoids mixing hazardous and non-hazardous wastes and can reduce the volume of waste and handling and disposal costs

**13.1 Hazardous Process -COP 26**

DIAMOND UNIVERSE LLC is not involved in any hazardous process which requires the use of any chemical.

The company is not using any hazardous substances that can pose a threat to human Health and/or the Environment. The company shall constantly monitor the usage of material in office premises and if found any hazardous substances, the due diligence, preventive and corrective measures shall be initiated.

The company ensures the disposal of all office waste through garbage and waste collection setup established by the commercial building management or through local governmental bodies. The usage of cleaning material shall be stored with proper identification and in safe condition.

* 1. **Waste and Emissions COP 27**

DIAMOND UNIVERSE LLC is not involved in any hazardous process which requires the use of any hazardous chemical and nor any boiling activity.

The DIAMOND UNIVERSE LLC is not using any hazardous substances that can pose a threat to human Health and/o Air and Water Emission. The company has not involved in any process which produce Common air emissions include dust and particulate matter, greenhouse gases, ozone-depleting substances and volatile organic compounds and Water emissions happen through discharges of waste water and process chemicals, surface runoff, groundwater leaching, and liquid spills. The company shall constantly monitor the usage of General Waste in office premises such as Wood, paper, plastics, food, plant-based items, metal, office consumables or office equipment, and commercial or shop discards and if found any hazardous substances, the due diligence, preventive and corrective measures shall be initiated.

The DIAMOND UNIVERSE LLC has developed Waste Management System by apply the principle of reduce, reuse, recycle and recover to minimize environmental impact by ways of reduce the amount of waste produced wherever possible, Reuse waste materials if practical, recycle materials that cannot be reduced or reused, recover materials or energy, Dispose of any residual waste safely, as a last resort.

The company shall discharge or dispose of wastes in compliance with applicable law. The company ensures the disposal of all office waste through garbage and waste collection setup established by the commercial building management or through local governmental bodies. The usage of cleaning material shall be stored with proper identification and in safe condition.

**15.1 Use of Energy and Natural Resources COP 28**

The DIAMOND UNIVERSE LLC will ensure the effective use of natural resources like energy, water, paper in their business operations. The DIAMOND UNIVERSE LLC uses such natural resources.

Carefully and ensure that natural resources are not used unnecessarily during the transportation also.

The management of the company define Diamond Grading is a process classifying a diamond’s characteristics, in terms of cut, color, clarity and carat weight.

Diamond grading is a process of classification of characteristics of gemstones, which can be carried out in independent laboratories or in-house.

**G: Diamond Gold and Platinum Company Metal Products**

**1: Product Disclosure**

**16.1 Policy Statement Product Disclosure – COP 29**

* 1. DIAMOND UNIVERSE LLC is committed to complying with relevant trading standard legislation and specific national and local regulations applicable to its products.
  2. The following essential Policies will be applicable in all transactions of DIAMOND UNIVERSE LLC involving diamonds, treated diamonds, synthetics and stimulant,
* **Disclosure -** DIAMOND UNIVERSE LLC shall fully and accurately disclose the material characteristic of their products. All reasonable efforts shall be made to properly disclose all relevant information on the physical characteristics, such as mass/weight, cut, cut, color, clarity or fineness, of a diamond or gold jewelry product.
* **Misrepresentation -** No untruthful, misleading or deceptive statement, “representation” or material omission in the “selling”, “advertising” or distribution of any diamond, treated diamond, synthetic, or simulant, or any gold product, shall be made by the Company in any medium, including the internet
* **Diamond Quality -** The weight, color, clarity or cut of diamonds will be described in accordance with the recognized guidelines appropriate to the particular jurisdiction.
* Full disclosure i.e. the complete and total release of all available information about a Diamond and all material steps it has undergone prior to sale to the purchaser, irrespective of whether or not the information is specifically requested and regardless of the effect on the value of the diamond.
* No misuse of terminology or misrepresentations or attempts to disguise the product will be made in the selling, advertising and distribution of treated diamonds, synthetics and simulant.
* The word ‘diamond’ will not be used in the case of names of firms, manufacturers or

Trademarks; in connection with treated diamonds or diamond simulant or synthetic Diamonds.

* 1. DIAMOND UNIVERSE LLC has adopted the following definitions:

**Diamond:** A diamond is a natural mineral consisting essentially of pure carbon crystallized with a cubic structure in the isometric system. Its hardness in the Mohs scale is 10; its specific gravity is approximately 3.52; it has a refractive index of 2.42 and it can be found in many colors.

**Synthetic:** A synthetic is any object or object that has been either partially or wholly crystallized or re-crystallized due to artificial human intervention such that, with the exception of being non-natural, the product meets the requirements specified in the definition of the word ‘diamond’ above.

**Treated Diamond:** A treated diamond is any object or product that meets the requirements specified in the definition of the word ‘diamond’ and ‘synthetic’ above, but has been subject to some form of treatment i.e. any process, enhancement changing, interfering with and/or contaminating the natural appearance or composition of a diamond other than historically accepted practices of cutting and polishing. This includes color and decolorization treatment, fracture filling, laser and irradiation treatment and coating.

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

* 1. **.1 Systems and Procedures:**

To implement the above policies, the following systems and procedures are followed:

Description of polished diamonds is provided either in the invoices or in attached packing lists in adequate detail to satisfy local guidelines and customer requirements.

1. DIAMOND UNIVERSE LLC generally does not deal in treated, synthetic diamonds and stimulants DIAMOND UNIVERSE LLC is committed to providing full written disclosure with respect to treated diamonds, synthetic diamonds and diamond simulants to the purchaser, and the same is attached to the bill of sale.
2. The company gives a written undertaking on sale of natural diamonds, stating that the product being sold falls under the accepted classification of ‘natural diamond’ and that no treatment of diamonds with respect to color alteration or flaw concealment has been resorted to the company will not use the terms ”brilliant”, ”brilliant cut” or “full cut” to describe, identify or refer to any diamond except a round Diamond that has at least 32 facets plus the table above the girdle, and at least 24 facets below it.
3. With respect to treated diamonds, the specific guidelines that are followed include:

* A treated diamond is always disclosed as ‘treated’ with specific reference to the particular treatment
* A description of the type of treatment and the method used to achieve the treatment always accompanies the diamond
* Any significant impact on the diamond’s value caused by the specific treatment is disclosed
* Any special care requirements that the treatment creates is disclosed Any term that is designed to disguise that treatment has occurred, or that implies that a treatment is part of the normal polishing process or the misleads the customer in any particular way (e.g. ‘improved’) is not used in the selling, advertising and distribution of treated diamonds

1. With respect to diamond simulants, the specific guidelines that are followed include:

* A diamond simulant is always disclosed either as the mineral or compound that it is or as a ‘diamond simulant’, ‘imitation diamond’, or ‘fake diamond’. The unqualified word ‘diamond’ is not used with diamond simulants.

1. With respect to synthetic diamonds, the specific guidelines that are followed include:

* The fact that a stone is wholly or partially synthetic is disclosed at all times
* A synthetic diamond is always disclosed as ‘laboratory created’, laboratory grown’, ‘man-made’, ‘[Manufacturer’s name] created’, ‘synthetic’, or ‘artificial’ and the description must be equally conspicuous and immediately preceding the word “diamond”.

1. With respect to misrepresentation and misuse of terminology, the specific guidelines that are followed include:

* The word “flawless” or “perfect” will not be used to describe
  1. any diamond that discloses flaws, cracks, inclusions, carbon spots, internal lasering, or other blemishes or imperfections of any sort when examined under a corrected magnifier at 10-power, with adequate illumination by a person skilled in Diamond grading;
  2. any article of Jewelry that contains any Diamonds that do not meet the definition of “flawless” or “perfect” The words ‘real’, ‘genuine’ and ‘natural‘ are not used to describe any ‘synthetic diamond’, or any other terms that may disguise the fact that a diamond is synthetic.

Or that mislead the consumer in any way.

* The words ‘real’ and ‘genuine’ are not used to describe any treated diamond or diamond simulant
* The word ‘natural’ is not used to describe any diamond simulant if the simulant is not a naturally accounting mineral or compound.
* In the selling, distribution and advertising of diamonds, no misleading statements or representations are made, that do not conform to the requirements as specified in Section 1.4 of the Standard.

1. The words “Brilliant”, “Brilliant Cut” and “Full Cut” are only used to describe a round diamond that has at least 32 facets plus the table above the girdle and at least 24 facets below it.
2. Names of firms, manufacturers or trademarks are not used in connection to treated diamonds, unless such names are clearly succeeded by the name ‘treated’, or are otherwise equally conspicuously and prominently disclosed as ‘treated’.
3. Names of firms, manufacturers or trademarks are not used in connection with diamond simulants, unless such names are clearly succeeded by the name of the ‘diamond simulant’, or the name of the specific mineral.
4. Names of firms, manufacturers, and trademarks are not used as descriptors for synthetic diamonds, unless such names are clearly succeeded by the terms ‘synthetic’, ‘man-made’ or ‘artificial’

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l. The company has identified and complied the applicable local, national and international   
trading standards and legislation as applicable to its diamond products in its Compliance Register. The company gets updates on the Compliance Register through its legal consultants.

m. All sales and promotional material for the company’s products are validated by the   
 Director In charge for conformance to disclosure requirements

The above systems and procedures have been communicated to the employees by way of training programs.

**16.1.2 Policy Statement – Synthetic Diamonds**

The policy relating to Synthetic Diamonds is a part of the Business Principles adopted by the Company and is presented below for reference:

* 1. The company recognizes that diamond industry is at a risk of reputational damage due to undisclosed synthetics being sold to end consumers. Towards this end the company is committed to identify and eliminate the chances of undisclosed diamonds entering its supply chain.
  2. The company is committed to continuously monitor its supply chain for identification of high-risk areas and implementing risk control on an ongoing basis.
  3. All relevant employees shall be trained on the requirements and system of pipeline monitoring for undisclosed synthetic detection.
  4. The company shall identify applicable legislation for undisclosed synthetics and initiate appropriate action on detection.
  5. Assurance warranty as per trade norms shall be ensured on all invoices of natural and untreated diamonds.
  6. Synthetic diamonds trading if required shall be undertaken with full disclosure in accordance with the disclosure norms.
  7. **.3 Supply Chain Management: Undisclosed Synthetics**

1. The company has identified processes and pipeline supply points wherein undisclosed   
   synthetic contamination can occur. The company has carried out a risk assessment of its pipeline supply points.
2. The procedure related to synthetic is described in company manual Synthetic Diamond detection manual.

**16.1.4 Reporting**

a) On detection in purchase goods management shall notify and report incidents to   
 relevant organizations, bourses, trade association, law enforcement agencies and   
 suppliers.

b) Inform RJC team if undisclosed synthetics have been supplied inadvertently to   
 customers.

**17.1 Policy Statement KPCS and SOW COP 30**

The policies relating to this section are part of the Business Policies adopted by DIAMOND UNIVERSE LLC, and are presented below for reference:

1. DIAMOND UNIVERSE LLC is fully committed to complying with all the requirements specified in the Kimberley Process Certification Scheme and World Diamond Council’s (WDC) System of Warranties Declaration.
2. The definition of ‘Conflict Gem Stone Diamonds’ as agreed by the Kimberley Process will be adopted i.e.

“Diamonds used by rebel movements or their allies to finance conflict aimed at undermining legitimate Governments, as described in relevant United Nations Security Council (UNSC) resolutions in so far as they remain in effect, or in other similar UNSC resolutions which may be adopted in the future, and as understood and recognized in United Nations General Assembly (UNGA) Resolution 55/56, or in other similar UNGA resolutions which may be adopted in the future.”

1. Wherever applicable, the following affirmative statement as recommended by the World Diamond Council’s System of Warranties should be printed on all the invoices:

“The diamonds herein invoiced have been purchased from legitimate sources not involved in funding conflict, in compliance with United Nations Resolutions and corresponding national laws. The seller hereby guarantees that these diamonds are conflict free and confirms adherence to the WDC SoW Guidelines.”

1. Entering into transactions involving ‘conflict diamonds’ or not following the System of Warranties Declaration in invoices, either knowingly or unknowingly, will be considered as a violation of the Business Policies.

DIAMOND UNIVERSE LLC ensures that concerned personnel within the organization know about government restrictions on the trade in Conflict Diamonds, the Kimberley Process Certification Scheme and the World Diamond Council System of Warranties.

DIAMOND UNIVERSE LLC is fully committed to adopting the requirements of the Kimberley Process Certification Scheme (KPCS) and Systems of Warranties (SoW) in all its business transactions involving purchase and sale of diamonds.

**17.1.1 Systems and Procedures**

1. The personnel involved in buying / selling and import / export of diamonds have been trained in the following aspects:

* Applicability of Kimberley Process Certificates
* Applicability of System of Warranties declaration in invoices
* Procedure to be followed for obtaining Kimberley Process Certificate from designated local authority for export
* Procedure to be followed in case of import of diamonds as specified by local designated authority
* Procedure to be followed for obtaining Kimberley Process Re-Export Certificate from designated local authority.

1. The independent accountant of DIAMOND UNIVERSE LLC carries out an audit and reconciliation of the Kimberley Process certificates (In and Out).
2. The Compliance Officer of DIAMOND UNIVERSE LLC keeps track of amendments to international and local designated authority guidelines relating to KPCS and SoW and communicates such changes to all concerned personnel.

The Compliance officer also conducts a quarterly audit of the compliance to KPCS and SoW after verifying the reconciliation of warranties-in and warranties-out.

**18.1 Grading and Appraisal: COP 31**

* The management of the company define Diamond Grading is a process classifying a diamond’s characteristics, in terms of cut, color, clarity and carat weight.
* Diamond grading is a process of classification of characteristics of gemstones, which can be carried out in independent laboratories or in-house.
* A Diamond Grading Report is a report on the grading of a Diamond’s physical characteristics, usually in terms of cut, color, clarity and carat weight. If an opinion on monetary value is included in a Diamond Grading Report, it is also considered to be an Appraisal Report.
* Appraising is generating an opinion of monetary value based on the company, composition, and qualities of a jewelry item.

**18.1.1Management Commitment:**

Grading and appraisal reports play an important role in the jewelry industry and can assist consumers in making purchasing decisions and in protecting and insuring their property. Information provided in grading and appraisal reports must therefore be transparent and not used in a manner that could be deceptive.

**18.1.2 Policy on Grading and Appraisal:**

* A diamond grading report, or grading certificate, shall include the weight, color, clarity and cut of an un-mounted stone.
* The report shall include a statement regarding whether the diamond has been identified as natural, or if it is treated or synthetic.
* The company shall ensure fair or transparent representation pertaining to the type, kind, grade, quality, quantity, metallic content, size, weight, cut, color, character, treatment, substance, durability, serviceability, origin, price, value, preparation, production, manufacture, distribution, or any other material aspect of an industry product.
* The company must ensure the provision of Applicable Law in all jurisdictions in which they operate.
* The company shall ensure while generate independent Appraisal Reports for end consumers shall include the name of the consumer to whom the report is given and a statement of the purpose of the appraisal.
* The company shall ensure while generate independent Diamond Grading Reports shall identify whether detection of Synthetics and/or any Treatments are part of the assessment.
* The provision of appraisals in the jewelry industry is a complex subject area and any person engaged in providing opinions of the value of jewelry products should ensure they are aware of their legal obligations.
* The company that offers Diamond Grading Reports or Appraisal Reports to end consumers that might reasonably be construed to be independent shall disclose any relevant vested interests in the sale of the Jewelry Product held by the grader or appraiser.

**18.1.3 System and Procedure:**

* The company shall train the relevant employees on the requirement of Grading and Appraisal code of practices.
* The company shall appoint compliance office to ensure proper compliance pertaining to Grading and Appraisal. The monitoring shall also be done to ensure proper compliance in this regard.

**Policy of Lab Grown Material**

* The requirements for establishing responsible business practices throughout the jewellery and watch supply chain, for handling laboratory grown materials
* The LGMS is comprised broad objectives:
* To improve legal and regulatory compliance, strengthen public reporting and secure a commitment to responsible business practices.
* To increase the use of due diligence in supply chains to uphold human rights, support community development, promote anti-corruption efforts and manage sourcing risks.
* To adequately control and disclose information about products and so avoid misleading or deceptive marketing practices.
* To protect the health and safety of both people and environments and to use natural resources efficiently.
* To better comply with international labour conventions and ensure responsible working conditions.
* Any reference to lab-grown materials within this standard shall be understood as meaning lab-grown diamonds and lab-grown coloured gemstones (emeralds, rubies and sapphires), used within the jewellery and watch supply chain, and within an RJC member’s certification scope. This includes any lab-grown materials that are: • whole or partial, composite (assembled), constructed, restructured; • coatings (on natural or lab-grown stones); and • rough, polished and recycled
* Members shall disclose information on the physical characteristics of the products listed in LGMS 27.1 in compliance with applicable law. Unless a conflict with applicable law exists, members shall apply the following requirements to support disclosure about physical characteristics: a. Laboratory grown materials: Wholly or partially laboratory-grown materials shall be disclosed as ‘laboratory grown’, ‘laboratory created’, ‘[manufacturer name] – created’, and/or ‘synthetic’. Abbreviations such as ‘lab-grown’ or ‘lab-created’ are also acceptable. The description shall be equally as conspicuous as the word ‘diamond’ or the name of the coloured gemstone. i. In the case of coating, the material being coated must be disclosed as ‘coated [name of material]’
* Composites: Composite (or assembled) lab-grown materials constructed of two or more parts shall be disclosed as ‘composite’, ‘assembled’, ‘doublet’ or ‘triplet’, and by the correct name of the material of which it is composed. The use of the term ‘diamond/ gemstone’ or ‘laboratory/created/synthetic diamond/gemstone’ in relation to such stones is unacceptable. The description shall be equally as conspicuous as the name of the material used. Members shall not use terms and definitions that are misleading in relation to composite (assembled) stones and/or conceal information about their parts. c. Reconstructed stones: Reconstructed stones using lab-grown materials shall be disclosed as such and the description shall be equally conspicuous as the name of the material. d. Simulants (or imitation): Any product used to imitate the appearance of lab-grown materials without having their chemical composition, physical properties and/or their structure shall be disclosed as ‘imitation’ or ‘simulant’ along with the correct name of the material of which it is composed, for example, ‘x compound’, ‘glass’, ‘plastic’. The description shall be equally as conspicuous as name of the lab-grown material. Simulants must not be referred to as laboratory grown or laboratory created. e. Descriptions of polished lab-grown materials: Describe the dimension or carat weight, colour, clarity and cut of lab-grown diamonds and coloured gemstones in accordance with the recognised guidelines appropriate to the particular jurisdiction. f. Enhancements: Any part of the growth/manufacturing process or subsequent enhancements to the created material that are deemed to be unstable and/or non permanent in nature shall be disclosed. g. Product health and safety information: Any relevant health and safety information about the materials listed in LGMS 27.1 in jewellery products sold by members to end consumers shall be disclosed. This includes irradiated lab-grown materials.

System and Procedure:

* The company shall train the relevant employees on the requirement of Lab Grown material standard and regularly monitor its requirement for disclosure and description of materials.
* The company shall appoint compliance office to ensure proper compliance pertaining to LGMS. The monitoring shall also be done to ensure proper compliance in this regard.
* Internal audit and disclosure compliance shall be ensured by the compliance officer.