



10/27/2021

Supply Chain Policy

1. Policy
 - a. This is the Policy and Procedure for Supply Chain Due Diligence
 - b. The supply chain includes Diamond / Coloured Gemstones studded Gold / Silver / Platinum Jewellery.
 - c. Our system facilitates Supply Chain Due Diligence
 - d. We shall have controls to ensure that our supply chain is transparent
 - e. We frequently engage with our suppliers to identify any Human Rights issues
 - f. E-mail address for raising grievance / concern is available on website
 - g. Any Grievance about our suppliers shall be resolved by the Management
 - h. The Policy shall be reviewed and revised as necessary annually
 - i. This policy will be shared with our suppliers
2. Risk Assessment & Red Flags
 - a. The supply chain shall be mapped and associated risks shall be managed
 - b. Risks associated with all major suppliers shall be identified using RJC Toolkit
 - c. Any suspected Human Rights issues shall be Red Flagged and further investigated
 - d. Any confirmation of adverse Human Rights impacts shall result in stoppage of business
3. Risk Response
 - a. Potential Risks identified during risk assessment shall be segregated as:
 - i. High Risk: Sourcing from CAHRA - Needing immediate action
 - ii. Medium: Risks that do not need immediate action but need to be further investigated and then addressed based on the impact
 - iii. Low: Source from RJC CoP 2019 Certified Supplier – No immediate action
 - b. The response shall be in in line with the impact.
4. Third Party Audit
 - a. We shall buy from certified suppliers as far as possible.
 - b. Certification could be:
 - i. Being on LBMA Good Delivery List
 - ii. RJC CoP 2019 Certification or RJC 2013 with Provenance Claim
 - iii. DMCC Responsible Supplier List
 - iv. Any other acceptable certification
 - c. We target 75% of our supply from RJC CoP 2019 certified suppliers in a year's time
 - d. The % of certified suppliers will be improved year on year



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5. Reporting
- a. We shall report any potential adverse impact findings on the website. We plan to report this on annually.
 - b. We shall also report if there are no findings
 - c. We shall also ask our suppliers to conduct a due diligence of their supply chain
 - d. In case a concern needs to be raised, follow the Grievance Handling Process
6. Grievance Handling Process
- a. Anyone can raise a grievance or concern in our supply chain.
 - b. The grievance can be raised on:
 - i. E-mail: grievance@iddny.com
 - ii. Telephone: 212-869-0325
 - iii. Post: Lokendra Jain (Compliance Officer) 535 5th Ave, 20th Floor, New York, NY 10017
 - c. The Grievances / Concerns shall be handled at the Top Management Level – COO - and the potential impact and action appropriate to the impact shall be implemented.
 - d. The action could also be to stop any further business with the business associate in case the impact is severe.
7. We assure all whistle blowers that all the communications will be held in strict confidence and there will be no retaliation of any kind.

A handwritten signature in black ink, appearing to read 'Lokendra Jain'.

Lokendra Jain

C.O.O.