



D H A R M DIAM BV

ANNUAL REPORT - 2022

DHARM DIAM BV annual report detailing our responsible business policies in accordance with the Responsible Jewelry Council standard of practice, the scope of this report covers all Code of Practices into measurable action.

We have been fully committed to ensure diamond, stones, gold, silver, tungsten, and platinum group metals in its products do not directly or indirectly finance or benefit armed groups that are perpetrator of human rights abuses in the Democratic Republic of Congo or an adjoining country, and not from conflict-affected and high-risk Area (CAHRA'S):

As part of this commitment, **DHARM DIAM BV** exercises due diligence on all our suppliers, taking lead from the RJC, Code of Practice (COP) 7. Under our supply chain policy we ensure that all counterparties source only from legitimate sources.

We have encouraged all its counterparties to obtain a relevant certification to demonstrate the conflict-free nature of their products, or to provide us with evidence for specific shipments to be conflict-free.

We have adopted, established, and implemented policies to ensure compliance under the following Code of Practices:

LEGAL COMPLIANCE

All local and federal laws are followed and when there are changes, we are notified through various entities or bodies and we ensure those changes are implemented in a timely manner.

POLICY AND IMPLEMENTATION

We have adopted and implemented various policies including Human Rights and Supply Chain Policies. All policies are uploaded on the Company's Notice Board, B2B and DTC for public availability.

REPORTING

Mr. Pankaj Virani is appointed as a Due Diligence Manager to oversee our Due Diligence Management System. We communicated publicly and directly with the stakeholders the due diligence and annual report relevant to the COP.

We encouraged all the suppliers and stakeholders, by posting on our website, our Human Rights Policy, Supply Chain Policy, and Grievance Procedure to be in line with the OECD guidance for due diligence on conflict-free minerals and UN human rights guiding for due diligence on diamonds compliant with the Kimberly Process Certification Scheme and the World Diamond System of Warranties.

FINANCIAL ACCOUNTS

We maintain financial accounts of all business transactions in accordance with acceptable International Accounting Standards. Internal auditing is conducted on the preventive and protection basis. The audited financial statements for the year 2021 were completed and the tax returns were filed on time.



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BUSINESS PARTNERS

We have identified significant vendors\business partners through financial data and send them Human Rights and Supply Chain policies to promote responsible business practices via E-Mail. All business partners fully participated in this due diligence process and the risk assessment showed negative findings or red flags.

HUMAN RIGHTS

We respect human rights by considering all potential and actual impacts in their operation and business relationships and encourage the business partners to commit to and implement the UN Guiding Principle on business and Human rights policies and procedures under RJC standard and all aspects of economic, environment and labor practices. Grievance procedure was adopted and made publicly available on the Company's website.

DUE DILIGENCE FOR RESPONSIBLE SOURCING FROM CONFLICT-AFFECTED AND HIGH-RISK AREAS (CAHRA'S)

We practice due diligence over our supply chain in accordance with the OECD Due Diligence Guidance for responsible supply chain of minerals from conflicted-Affected and High-Risk Area, by implementing our risk assessment management system based on OECD guidance with our supply chain. We perform due diligence with internal awareness by training our relevant staff. Our 2022 supplier due diligence report showed no risk and therefore did not require disengagement with any of our suppliers.

BRIBERY AND FACILITATION PAYMENTS

We established and implemented Anti-Bribery Policy and Procedure that prohibit bribery and facilitation payments. We trained our new employees in the appropriate Departments to make sure the policy is understood and followed. We wrote our Company's grievance procedures for employees. No complaints were received in 2022.

KYC: MONEY LAUNDERING AND FINANCE OF TERRORISM

We document and apply a Know Your Counterparty (KYC) policy and procedure for all suppliers. Our Due Diligence Manager is appointed to be responsible for implementing KYC policy and procedure. Through our due diligence on all suppliers, we found no one at risk.

SECURITY

We assess security risks and establish risk assessment policy/procedure to protect employees, contractors, visitors, personnel employed by relevant business partners against product theft, damage, product substitution within the premises and during events and shipment. Daily security risk assessment is exercised.

LABOR RIGHTS AND WORKING CONDITIONS

We ensure that employment terms with regards of wages, working hours and other employment conditions are communicated to employees in writing before employment starts. We established the hiring policy and procedure according to applicable labour law and international Labor Standard in regards to child labor, forced labor, discrimination, harassment, retaliation and encourage the freedom of association and collective bargaining in the workplace.

We ensure that employees are treated with dignity and respect and are not subjected to harassment or violence



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or threatened with these towards themselves their family or colleagues.

We have grievance procedure implemented and posted in the workplace and on the Company's Notice Board. No grievance or violation was found.

HEALTH, SAFETY AND ENVIRONMENT

DHARM DIAM BV ensures a safe and healthy working environment for all employees by complying with Federal and State laws as well as our business partners' requirements. The premises are well maintained and the bathrooms are cleaned often. Logs are kept and displayed as proof. A clean lunch room facility is accessible to all employees.

CONCLUSION

All the Company's business practices in 2022 are in compliance with Responsible Jewelry Council's Code of Practice.

Mr Pankaj Virani
Due Diligence Manager / Compliance Officer
Dt: 10th February 2023



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Human Rights Due Diligence Policy.

1. DHARM DIAM BV is a RJC Certified Company having polished diamonds trading office at New York, USA. This policy confirms company's commitment to respect human rights, avoid contributing to the finance of conflict and comply with all relevant UN sanctions, resolutions and laws.
2. DHARM DIAM BV is a certified member of the Responsible Jewellery Council (RJC). As such, we commit to proving, through independent third-party verification, that we:
 - a. respect human rights according to the Universal Declaration of Human Rights and International Labour Organization Fundamental Rights at Work;
 - b. do not engage in or tolerate bribery, corruption, money laundering or finance of terrorism;
 - c. support transparency of government payments and rights-compatible security forces in the extractives industry;
 - d. do not provide direct or indirect support to illegal armed groups; and
 - e. enable stakeholders to voice concerns about the jewellery supply chain.
 - f. are implementing the OECD 5-Step framework as a management process for risk based due diligence for responsible supply chains of minerals from conflict-affected and high-risk areas.
3. We also commit to using our influence to prevent abuses by others.
4. Regarding serious abuses associated with the extraction, transport or trade of diamonds We will neither tolerate nor profit from, contribute to, assist or facilitate the commission of:
 - a. torture, cruel, inhuman and degrading treatment;
 - b. forced or compulsory labour;
 - c. the worst forms of child labour;
 - d. human rights violations and abuses; or
 - e. war crimes, violations of international humanitarian law, crimes against humanity or genocide.
5. We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are committing abuses described in 4 or are sourcing from, or linked to, any party committing these abuses.
6. Regarding direct or indirect support to non-state armed groups We only sell or purchase Polished diamonds 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 from, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates who illegally:
 - a. control mine sites, transportation routes, points where diamonds are traded and upstream actors in the supply chain; or
 - b. tax or extort money or diamonds at mine sites, along transportation routes or at points where diamonds are traded, or from intermediaries, export companies or international traders.
7. We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are sourcing from, or are linked to, any party providing direct or indirect support to non-state armed groups as described in paragraph 6.
8. Regarding public or private security forces



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We affirm that the role of public or private security forces is to provide security to workers, facilities, equipment and property in accordance with the rule of law, including law that guarantees human rights. We will not provide direct or indirect support to public or private security forces that commit abuses described in paragraph 4 or that act illegally as described in paragraph 6.

9. Regarding bribery and fraudulent misrepresentation of the origin of diamonds

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

10. Regarding money laundering

We will support and contribute to efforts to eliminate money laundering where we identify a reasonable risk resulting from, or connected to, the extraction, trade, handling, transport or export of diamonds.



Signed/endorsed:

Date of effect: 24TH January 2022



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DUE DILIGENCE PROCESS OF HUMAN RIGHTS - 2022 (Dated - 06-Feb-2023)

2. Human Rights Due Diligence Review

2.1 Human Rights Issue (including COP Reference and Risks)	No.	2.2 Indicator	2.3 Tips and Guidance	2.4 Your Response	2.5 Recommended Next Steps	2.6 Supporting Information / Evidence	2.7 Next Review Date	2.8 Comments / Notes
		Below are indicators or types of systems and processes that the Member should have in place.	Tips and issues to consider when preparing the response and supporting notes / evidence for each indicator. (Click on the cell to be able to scroll down.)	Please note whether you meet this indicator. (Select form the menu options)	Based on your response, a message will be generated that recommends the next steps for you.	Please list any supporting notes, evidence, relevant information and/or an explanation for your response.	Nominate the next Human Rights Due Diligence review date.	Comments or notes about the risk.
Consider how well human rights considerations have been integrated in business systems.								
Business-specific risks	1	The business has a means to identify and manage other human rights risks, if any, arising through its own activities.		Broadly managed	Please document the processes and controls used to support this response. No further action is required unless there is a change to the business.	RJC Policy and Procedure document	05-Jan-24	Low Risk
Legal Compliance (COP 1)	2	Systems for awareness and compliance with Applicable Law include coverage of human rights areas in this Toolkit.		Broadly managed	Please document the processes and controls used to support this response. No further action is required unless there is a change to the business.	ID No: BE0477689960	05-Jan-24	Low Risk
Policy and Implementation (COP 1)	3	Senior management's review of the ongoing suitability and adequacy of the Member's business practices includes consideration of human rights risks.		Broadly managed	Please document the processes and controls used to support this response. No further action is required unless there is a change to the business.	RJC Policy and Procedure document	05-Jan-24	Low Risk
Reporting (COP 3)	4	Communication to stakeholders includes reference to your general approach to addressing human rights risks.		Broadly managed	Please document the processes and controls used to support this response. No further action is required unless there is a change to the business.	RJC Policy and Procedure document	05-Jan-24	Low Risk
Use the toolkit to review human rights risks with business partners and in challenging situations.								
Business Partners (COP 5)	5	The business expects respect for human rights from its significant Business Partners.		Broadly managed	Please document the processes and controls used to support this response. No further action is required unless there is a change to the business.	RJC Policy and Procedure document	05-Jan-24	Low Risk



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Business Partners (COP 5) <ul style="list-style-type: none"> • Right to a safe and healthy work environment • Right to rest and leisure 	6	If orders are placed to suppliers with very tight deadlines, the business has considered potential human rights risks.		Broadly managed	Please document the processes and controls used to support this response. No further action is required unless there is a change to the business.	RJC Policy and Procedure document	05-Jan-24	Low Risk
Business Partners (COP 5)	7	The business knows how it will respond in the event that it becomes aware that a Business Partner is not respecting human rights.		Broadly managed	Please document the processes and controls used to support this response. No further action is required unless there is a change to the business.	RJC Policy and Procedure document	05-Jan-24	Low Risk
Conflict-Affected Areas (COP 6.2) <ul style="list-style-type: none"> • Right to life, liberty and security of the person • Freedom from torture or cruel, inhuman or degrading treatment • Right to non-discrimination • Right to self-determination • Humanitarian law 	8	If operating or planning to operate in a conflict-affected area, the business has formally assessed the heightened human rights risks.		Not Applicable	Please document the reason for the Not Applicable Response.	Not Applicable	Not Applicable	The company is not operating in conflict affected area.
Conflict-Affected Areas (COP 6.2) <ul style="list-style-type: none"> • Right to life, liberty and security of the person • Freedom from torture or cruel, inhuman or degrading treatment • Right to non-discrimination • Right to self-determination • Humanitarian law 	9	If sourcing diamonds, gold or platinum group metals directly from conflicted affected areas, the business has formally assessed the heightened human rights risks.		Not Known	Establish an action plan to gather more information about whether this Human Rights issue is relevant to the business.	Not Applicable	Not Applicable	The company is not operating in conflict affected area.
Conflict-Affected Areas (COP 6.2) <ul style="list-style-type: none"> • Right to life, liberty and security of the person • Freedom from torture or cruel, inhuman or degrading treatment • Right to non-discrimination • Right to self-determination • Humanitarian law 	10	If operating or planning to operate in, or sourcing diamonds, gold or platinum group metals directly from, a conflict-affected area the business has put in place systems to prevent or mitigate the identified risks.		Not Applicable	Please document the reason for the Not Applicable Response.	Not Applicable	Not Applicable	The company is not operating in conflict affected area.



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Sourcing from Artisanal and Small-Scale Mining (ASM) (COP 7) <ul style="list-style-type: none"> • Right to a safe and healthy work environment • Right to physical and mental health • Right to life, liberty and security of the person • Abolition of child labour • Right to education • Abolition of forced labour 	11	If sourcing diamonds, gold or platinum group metals directly from ASM, the business checks that the ASM: <ul style="list-style-type: none"> • has controls to prevent the use of forced labour and worst forms of child labour • has work place health & safety practices which protect the wellbeing of its employees and contractors • uses mercury in a controlled, safe and environmentally acceptable manner • controls for other significant environmental impacts 		Not Applicable	Please document the reason for the Not Applicable Response.	Not Applicable	Not Applicable	The company is not operating in conflict affected area.
Sourcing from Artisanal and Small-Scale Mining (ASM) (COP 7) <ul style="list-style-type: none"> • Right to a safe and healthy work environment • Right to physical and mental health • Right to life, liberty and security of the person • Abolition of child labour • Right to education • Abolition of forced labour 	12	If sourcing diamonds, gold or platinum group metals directly from ASM, the business collaborates and use best endeavours to support the ASM improve its practices in relation to human rights, health & safety and environmental performance.		Not Applicable	Please document the reason for the Not Applicable Response.	Not Applicable	Not Applicable	The company is not operating in conflict affected area.
Financial risks (COP 9) <ul style="list-style-type: none"> • Bribery and Facilitation Payments • Anti-Money Laundering and Financing terrorism 	13	Understanding, measuring, and mitigating financial risk is critical for the long-term success of an organization. Financial risk may prevent a company from successfully accomplishing its finance-related objectives. By understanding what causes financial risk and putting measures in place to prevent it, a company will likely experience stronger operating performance and yield better returns.		Broadly managed	Please document the processes and controls used to support this response. No further action is required unless there is a change to the business.		05-Jan-24	Low Risk



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Security (COP 11) <ul style="list-style-type: none"> • Right to privacy • Right to life, liberty and security of the person • Freedom from degrading treatment • Right of peaceful assembly • Right to non-discrimination 	14	If the Member uses security service providers, respect for human rights is expected and supported in accordance with the Code of Practices.		Broadly managed	Please document the processes and controls used to support this response. No further action is required unless there is a change to the business.	RJC Policy and Procedure document	05-Jan-24	Low Risk
Supply chain-specific risks	15	The business has a means to identify and manage other human rights risks, if any, directly linked to business' operations, products or services by business relationships.		Broadly managed	Please document the processes and controls used to support this response. No further action is required unless there is a change to the business.	RJC Policy and Procedure document	05-Jan-24	Low Risk
Product Security (COP 11)	16	A Product Security is important within an organization which, at its core, focuses on the identification, assessment, and disposition of the risks associated with security vulnerabilities within the products which an organization sells or purchase.		Broadly managed	Please document the processes and controls used to support this response. No further action is required unless there is a change to the business.	Block Policy	05-Jan-24	Low Risk
Product Disclosure (COP 26)	17	Product disclosure concerns proper and accurate disclosure of all relevant information about diamond products, including treated diamond, synthetic, simulants. Product disclosure within the diamond industry depends on honesty and transparency about the nature and quality of products being bought and sold. It is especially important because end consumers rarely have good technical knowledge about the products they are buying and rely on the disclosure of sellers.		Broadly managed	Please document the processes and controls used to support this response. No further action is required unless there is a change to the business.	CIBJO Guidelines	05-Jan-24	Low Risk

Use the toolkit to confirm implementation of these core human rights-related COP requirements.



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General Employment Terms (COP 13) • Right to Privacy	18	Privacy rights of employees are respected when gathering personal information or implementing employee-monitoring practices.		Broadly managed	Please document the processes and controls used to support this response. No further action is required unless there is a change to the business.	Fair Labor Standard Act (FLSA)	05-Jan-24	Low Risk
Child Labour (COP 17) • Abolition of child labour • Right to education	19	Minimum age and appropriate work requirements of the Code of Practices are being upheld.		Broadly managed	Please document the processes and controls used to support this response. No further action is required unless there is a change to the business.	RJC Policy and Procedure document	05-Jan-24	Low Risk
Child Labour (COP 17) • Abolition of child labour • Right to education	20	If the Member becomes aware of a situation of child labour, a documented remediation process is developed .		Broadly managed	Please document the processes and controls used to support this response. No further action is required unless there is a change to the business.	RJC Policy and Procedure document	05-Jan-24	Low Risk
Forced Labour (COP 18) • Abolition of slavery and forced labour • Freedom of movement	21	The Member does not use forced labour in its various forms in accordance with the Code of Practices.		Broadly managed	Please document the processes and controls used to support this response. No further action is required unless there is a change to the business.	RJC Policy and Procedure document	05-Jan-24	Low Risk
Freedom of Association and Collective Bargaining (COP 19) • Right to organize and participate in collective bargaining	22	The Member respects the right to associate freely and participate in collective bargaining in accordance with the Code of Practices.		Broadly managed	Please document the processes and controls used to support this response. No further action is required unless there is a change to the business.	RJC Policy and Procedure document	05-Jan-24	Low Risk
Non-Discrimination (COP 20) • Right to non-discrimination• Right to equal pay for equal work• Right to family life• Right to hold opinions• Freedom of information and expression	23	The Member upholds principles of non-discrimination in accordance with the Code of Practices.		Broadly managed	Please document the processes and controls used to support this response. No further action is required unless there is a change to the business.	RJC Policy and Procedure document	05-Jan-24	Low Risk