



DHARMANANDAN  
DIAMONDS

### **Supply Chain Policy**

1. Dharmanandan Diamonds Pvt. Ltd having registered office at FC 7081-82, F-Tower, Bharat Diamond Bourse, BKC, Mumbai, India. This policy confirms group of companies' commitments to respect human rights, avoid contributing to the finance for conflict and comply with all relevant applicable resolutions and laws.
2. Being a Sightholder of DeBeers and long-term alliance with Alrosa and having certified management system like ISO 9001, 14001, 45001,, we are committed to provide, 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. Does not engage in or tolerate bribery, corruption, money laundering or finance for terrorism;
  - c. Support transparency of government payments and rights-compatible security forces in the extractives industry;
  - d. Does not provide direct or indirect support to illegal armed groups;
  - e. Enable stakeholders to voice concerns about the Jewellery supply chain; and
  - 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 use our influence to prevent abuses by others.**

We raised the voice of concern to various bodies like KP Authority, Government, Diamond Bourse & Certification Bodies regards to the goods supply from area of CAHRAs.

We majorly source the diamonds from direct miners like DeBeers, ODC & others and secondary suppliers. We also assign responsibility to senior employees of the company to take necessary actions if any of our suppliers does not fulfill the compliance

requirements, majority of our suppliers are RJC and BPP certified members, they follows the norms and compliance of relevant COP, hence the risk is very low due to type of sourcing practices of the company.

**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, crime against humanity or genocide.

**5. We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are committing abuses described in 4 or are sourcing from, or linked to, any party committing these abuses.**

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

We only sell or purchase diamonds 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.

**8. Regarding public or private security forces:**

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

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

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.

**11. Provenance Claim:**

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

“To the Best of our knowledge and/or written assurance from our suppliers, we state that the diamonds herein invoiced have not been obtained in violation of applicable national laws and/or sanctions by the US departments of Treasuries office of foreign assets control (OFAC) and have not originated from the MBADA and Marange resources of Zimbabwe.”

## Source of Origin / Provenance\*\*:

These diamonds are from DTC and originated in South Africa, Botswana, Namibia and Canada. For more information, please visit [www.dtc.com](http://www.dtc.com)

\*\* Note: This declaration will be only the memo / sales invoice to the customer.

## 12. Grievance Mechanism

The Group has established this procedure to hear concern about the circumstance in any above issues of the supply chain. Below matrix developed for the group of companies.

Sr. No	Name of the companies	Responsible Person	E-mail
1	Dharmanandan Diamonds Pvt. Ltd	Mr. Balakrishnan R	bkd@ddpl.com
2	Dharm Cuttings Work Pty Ltd	Mr. Kunal Shah	Kunal.bw@ddpl.com
3	Dharm Diam BV	Mr. Pankaj Virani	be@ddpl.com
4	Dharm International LLC	Mr. Bhavesh Virani	usa@ddpl.com
5	Dharam Creations (HK) Ltd.	Mr. Manish Mangukiya	hk@ddpl.com
6	Dharm (Shanghai) Ltd.	Mr. Dharmesh Savani	cn@ddpl.com

### On receiving a complaint, we will aim to:

- Get an accurate report of the complaint.
- Explain our complaints procedure.
- Find out how the complainant would like to handle.
- Decide who the appropriate person internally to handle the complaint is or help redirect the complaint to another entity, such as the relevant supplier or a relevant industry body.
- Where the issue can be handled internally, seek further information where possible and appropriate.
- Advise the complainant of any decisions or outcomes.

Date of effect: 01<sup>st</sup> January 2023

Revision: 1.1