



DHARM INTERNATIONAL LLC

Human Rights Due Diligence Policy.

1. DHARM INTERNATIONAL LLC 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 International LLC 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: 01-01-2021





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DUE DILIGENCE PROCESS OF HUMAN RIGHTS - 2022 (Dated - 05-Jul-2022)

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 from 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-23	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.	Employer Identification Number:27-2651962	05-Jan-23	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-23	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-23	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-23	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-23	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-23	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.	The American Anti-Corruption Act, FATF Guideline, KYC/KYS, Internal Audit Report, Records of Suspicious transaction US Patriot Act	05-Jan-23	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-23	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-23	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-23	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-23	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) <ul style="list-style-type: none">• 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-23	Low Risk
Child Labour (COP 17) <ul style="list-style-type: none">• 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-23	Low Risk
Child Labour (COP 17) <ul style="list-style-type: none">• 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-23	Low Risk
Forced Labour (COP 18) <ul style="list-style-type: none">• 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-23	Low Risk
Freedom of Association and Collective Bargaining (COP 19) <ul style="list-style-type: none">• 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-23	Low Risk
Non-Discrimination (COP 20) <ul style="list-style-type: none">• 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-23	Low Risk