

ETHICAL BUSINESS POLICY for RJC COP 2019

SCOPE OF THIS POLICY (RJC COP 2019 POLICY)

GEM CENTRE, Jaipur is a gold & silver jewellery manufacturing & cutting & polishing of gemstones company which is situated at Sitapura Industrial Area, Jaipur has employed more than 100 personnel.

We believe in running and developing our business in a sustainable way, for the benefit of those who work in it. We believe that our business interests are best served by behaving responsibly towards all of our stakeholders; clients, staff, suppliers and the communities in which we operate.

RJC's "Code of Practices" defines responsible ethical, human rights, social, and environmental practices, applicable to all RJC members.

Gem Centre has become a member of RJC and is fully committed to the Code of Practices. We strongly encourage all our business partners to follow and implement the various requirements of the RJC system.

We encourage your co-operation in adopting the standard and ensuring that the entire Gem Stone industry is seen as a role model in setting high standards with respect to business, social and environmental responsibilities.

HUMAN RIGHT POLICY

Our Ethical Business Policy therefore sets out the universal standards for human rights of individual and collective behaviour that we seek to apply to all of our activities around the world. Therefore, we will: -

- ❖ Treat staff fairly and with respect for their dignity.
- ❖ Implement policies and procedures to prevent slavery and human trafficking in all parts of our business, and within our supply chain.
- ❖ Deal with clients with integrity, offering good value, high quality advice and prompt redress if something goes wrong.
- ❖ Embrace the aspirations of our clients and the design team, making positive, enthusiastic and timely contributions and deploying the best available expertise in the design process.
- ❖ Conduct our relationships with suppliers with honesty, fairness and mutual trust.
- ❖ Be fair and honest in our dealings with Contractors, select them objectively and administer their contracts judiciously.
- ❖ Always specify products for projects rationally, acting solely in the client's interest, in a way that is auditable.
- ❖ Comply fully with our legal obligations and aim to make a positive contribution to the sustainable development of the communities in which we work.

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- ❖ Monitor ethical performance and produce regular reports giving a true and fair view of our affairs.

This policy aims to outline how we do business. We recognise that it would be impossible to produce a comprehensive set of rules that cover every situation that our people might encounter in the course of their work. Instead, this policy seeks to provide the framework within which we expect our people to operate, and some guidelines as to what may or may not be acceptable. Where a particular activity is clearly at odds with our ethics as an organisation and is deemed to be unacceptable in any circumstances, this is made clear in this policy. As a general rule, we expect people to make sensible and informed judgements about whether a particular activity, approach or way of working is ethical and likely to be acceptable to the Practice, and to seek guidance from others within the Practice as required where they are unsure. This policy should be read in conjunction with the Practice's specific policies on:

- ❖ Health, Safety and Welfare
- ❖ The Environment
- ❖ Diversity
- ❖ Equal Opportunities

SUPPLY CHAIN POLICY

GEM CENTRE always ensure that our supply chain is free of any metal/Diamond/ Gemstones which was gathered for the support or benefit of armed conflict groups or involving serious abuses of human rights. Further, abusive practices from public or private security forces or support to non-state armed groups will not be tolerated.

As part of our supply chain due diligence, we shall be watchful for and assess the severity of various risks as recommended in the OECD Guidance Annex II Model Supply Chain Policy;

Specifically:

- Serious abuses associated with the extraction, transport or trade of minerals:
- Any forms of torture, cruel, inhuman and degrading treatment
- Any forms of forced or compulsory labour
- 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
- Direct or indirect support to non-state armed groups
- Direct or indirect support to public or private security forces
- Bribery and fraudulent misrepresentation of the origin of minerals
- Money laundering
- Non-payment of taxes, fees and royalties to governments

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Communication with stakeholders

Gem Centre communicates this sourcing policy to our suppliers and customers and make it publicly available for review. Additionally, we require acknowledgement of this policy from our supplier.

BRIBERY AND CORRUPTION

- ❖ Anti-bribery and anti-corruption policy apply to all employees of Gem Centre, Jaipur and any bribery or corruption is always contrary to GEM CENTRE, ' standards of business conduct. Gem Centre, Jaipur employees must not under any circumstances make or accept any offers of bribery (this is widely defined and includes offers of services, money, gifts or entertainment). If you are in any doubt regarding this, you should speak to a member of the Management. Any actual or suspected bribery must be reported to a member of the Management.
- ❖ Any employee who is suspected to have breached our policy in this regard will be subject to a disciplinary investigation, which may lead to their dismissal from their employment.
- ❖ Any report by an employee of actual or suspected bribery will be treated in confidence and (provided that any such report is made in good faith in support of GEM CENTRE, commitment to zero tolerance towards bribery and corruption), the employee shall be protected from any reprisals in connection with their report.

GIFTS AND ENTERTAINMENT

The exchange of gifts and entertainment can build goodwill in business relationships but can also create improper influence or the appearance of improper influence. The Practice therefore provides detailed guidance for managers and staff, to help them determine whether gifts may be accepted or not.

SUPERVISION OF OTHERS

Those who supervise others having additional responsibilities for maintaining compliance with this policy. They must: -

- ❖ Lead by example, promoting compliance and ethics in all of their behaviours.
- ❖ Make sure that those who report to them understand the requirements of this policy and have the resources to meet them.
- ❖ Support employees who, in good faith, raise questions or concerns about ethical issues within the Practice.

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PERSONAL RESPONSIBILITY

Everyone who works within the Practice has a responsibility to comply with the letter and the spirit of this policy, and to bring to the attention of management any suspected breach of the policy. In considering whether to speak up about a suspected breach, employees should ask themselves some simple questions: -

- ❖ Is the action legal?
- ❖ Does it comply with our Ethical Business Policy?
- ❖ Does it match the commitments and guarantees that we have made to others?
- ❖ Does it feel right?

As well as compliance with the policy, members of the Practice are expected to exercise good judgement and common sense, so that their actions never jeopardise our reputation as a responsible business.

Gem Centre has established a grievance procedure to hear concerns about human right violation or any other unethical trade practice within company or supply chain.

The compliance officer Mr. Vipin Jain (General Manager) shall be responsible for implementing and reviewing this procedure.

Supply Chain policy violation related concerns can be raised by interested parties via email to:

info@thegemcentre.com

More information about the Compliance Program is available on <http://www.thegemcentre.com>

This Policy is Endorsed by following person as Owner/Director of this company.

Effective Date: - 01/01/2025

Place: Jaipur

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