

The Policy promote the standards that we expect all our suppliers to comply with when producing and supplying Diamonds to Hari Darshan Group, no matter where they operate in the world. It Includes H.D Diam DMCC and H.D Diam (HK) Ltd.

The senior management of Hari Darshan Group advocate this policy and we shall review as and when changes in the process or compliance requirement or any violation of sourcing policy or Changes in risk and due diligence criteria. We shall carry out review of this entire document at least annually.

We recognise that full compliance with these criteria may take time for some suppliers, and we are committed to working with our suppliers to implement improvement plans and help them achieve compliance.

Hari Darshan Group is committed to working in partnership with its suppliers to help achieve compliance with this Policy.

All the suppliers should comply with national and international law and trade requirement like RJC/BPP with respect to Bribery and Corruption, Financial Offence, Labour Rights, Kimberley process and World Diamond Council – SoW, Product disclosure, Labour Rights, Working Condition, Child labour, Forced labour, Human rights, Discrimination, Fair wages and working hours, Environment compliance, Health and safety of the employees and visitor.

#### **Policy – Supply Chain and Ethical Sourcing**

At Hari Darshan Group, we take Ethical business practice, social and environmental factors into consideration in making decisions on the procurement of Rough or polish diamonds.

This Policy shows Hari Darshan’s commitment and its expectations for its product suppliers regarding actions to address Conflict Diamonds.

Hari Darshan Group expects it's suppliers to have in place policies and due diligence measures that will enable us to reasonably assure that diamonds supplied to us containing **conflict free diamonds** are not belongs to Conflict-affected and high-risk areas – CAHRAs .

We being a responsible company, Hari Darshan Group supports the goal of the Dodd-Frank Act of preventing armed groups in the conflict affected and high risk countries from benefitting from the sourcing of Conflict diamonds from that region.

Hari Darshan Group is committed to working with its suppliers to educate them on these matters and concerning steps they can take to obtain increased transparency regarding the origin of diamonds mined or manufacture and sell to Hari Darshan Group.

Hari Darshan Group reserves the right to evaluate the extent to which a supplier has failed to reasonably comply with this Policy. Hari Darshan Group reserves the right to request additional documentation from its suppliers regarding the origin/source of diamonds sold to Hari Darshan Group.

Suppliers who do not reasonably comply with this Policy shall be reviewed by Hari Darshan Group ’s for future business.

Hari Darshan Group is committed to ensuring that our supply chain is free of any diamonds which was procured for the support or benefit of armed and anti-social conflict groups or involving serious abuses of human rights and non-compliant with OECD Guidelines.

Hari Darshan Group clearly criticizes such activity and will reject any material which we believe was obtained involving serious human rights violations or which benefitted or supported armed rebels or terrorist groups through illegal finance or other activities.

The company shall carry out risk assessment for its supply chain and shall not enter into any business relationship or if may require then shall suspend/discontinue the engagement with any such supplier involved in dealing with Conflict-Affected and High-Risk areas, Any form of Human Right Violation; Torture, Cruel, In-Human and Degrading Treatment; Forced/Compulsory Labour; Child Labour; Abuses such as widespread Sexual Violence; War Crimes; other serious violations of International Humanitarian Law, Crime against Humanity; Genocide and/or To Bribe or To be Bribe. We strictly condemn and prohibit any Direct/Indirect support to public/private security forces which illegally Control, Tax or Extort money from Mining Sites, Transportation Routes and Upstream Sectors.

The Company shall carry out due diligence to assess risks related to procurement from the Conflict-affected and high-risk areas – CAHRAs and shall always source from compliant miners/traders.

We shall always set reasonable efforts to source Diamonds from miners and traders validated as being Conflict Free and require their direct and indirect suppliers to do the same;

We strive to work supportively with our customers and supply chain partners in implementing conflict free compliance programs for Diamond Supply chain.

#### **Policy – Due Diligence and Risk Assessment**

The company shall always undertake to ensure that the extraction and trade of diamond support peace and development, not conflict.

Hari Darshan Group remains committed to enhance its Supply Chain Due Diligence program through internal review and external assessments. We have zero tolerance policy for the supplier violating OECD due diligence guideline and we shall immediately stop commercial relationship if any of our business associates found non-compliant or High-Risk during our internal/external risk assessment.

All the suppliers are also requested to carry our risk assessment and due diligence for their suppliers and products they are sourcing.

Currently Hari Darshan Group procure it's diamonds from RJC CoP/Ethical business practice compliant miners/traders. However, we have established a strong due diligence process and we shall review it as an when we observed significant risk or upon receipt of any grievance or complaint but in normal course, we shall carry our due diligence process on annual basis.

#### **Grievance Mechanism**

Our employees, suppliers and other parties can report concerns and alleged violations of supply chain/sourcing/due diligence policy/Diamond Pipeline Integrity/provenance claim/ethical business practice as follows:

Email: anil@hdegroun.in call: +91-22-43434000

Reports can be made anonymously and will be kept confidential to the fullest extent practicable and allowed by law. We will not take any retaliatory action against our employees, suppliers, or other parties who make a report in good faith. Our suppliers are encouraged to contact if they wish to seek guidance on the application of this Policy.

## Supplier Risk Assessment /Due Diligence Report

We the senior management of Hari Darshan Group and compliance officer has verified all our supplier with respect to following ;

1. OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
2. US OFAC Sanctions
3. EU Sanctions
4. Global Peace Index
5. Know Your Country
6. Transparency International (TI)
7. The Office of the United Nations High Commissioner for Human Rights (OHCHR)

<http://www.responsiblemineralsinitiative.org/minerals-due-diligence/risk-management/conflict-affected-and-high-risk-areas/>

Publication (Detailed report is with Compliance team and may produce to concerned parties upon request)

Compliance team of Hari Darshan Group has completed the due diligence and Risk assessment of all its Diamond supplier with respect to latest BPP/RJC guideline and we found all our supplier are complying with requirements not found any risk pertaining to their business involvement in Conflict Affected and high risk Areas' (CAHR's).

Date: 03/04/2023

Mumbai