



**SANDEEP DIAMOND CORPORATION**  
545 FIFTH AVE FL 4 NEW YORK, NY 10017

## Supply Chain Policy & Procedure

1. Sandeep Diamond Corporation is a Diamond Trading Company. This policy confirms Sandeep Diamond Corporation's commitment to respect human rights, avoid contributing to the finance of conflict and comply with all relevant USA / UN sanctions, resolutions and laws.
2. Sandeep Diamond Corporation is a 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. Our suppliers are not from CAHRA and we do not procure goods from CAHRA. Our major Suppliers is RJC CoP 2019 Certified member and hence is compliant to OECD Guidelines. We encourage our associates to be certified RJC Members.
4. Regarding serious abuses associated with the extraction, transport or trade of diamonds/coloured gemstones  
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 diamonds/coloured gemstones that are fully compliant with the Kimberley Process Certification Scheme / WDC SoW and, as such, will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring diamonds/coloured gemstones 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/coloured gemstones are traded and upstream actors in the supply chain; or
  - b. tax or extort money or diamonds/coloured gemstones at mine sites, along transportation routes or at points where diamonds/coloured gemstones 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  
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/coloured gemstones  
We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of diamonds/coloured gemstones, 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/coloured gemstones.
11. A Due Diligence report is available upon request – Risk assessment is available and there are currently no potential High Risks and no Red Flags in the supply chain.

Any concerns / complaints can be reported by email on ([concern@sandeepdiamond.com](mailto:concern@sandeepdiamond.com))

**Sandeep Shah**  
**President**  
**1<sup>st</sup> October 2024**

October 15th, 2024

Dear Supplier,

I am writing to inform you that as a member of the Responsible Jewellery Council (RJC), Sandeep Diamond Corporation is required to carry out due diligence on our supply chain to ensure that we source precious metals responsibly, in a way that respects human rights and does not contribute to conflict.

As part of our commitment to responsible sourcing, we are now working with our suppliers to understand their sources of supply and due diligence procedures for managing risks in their supply chain.

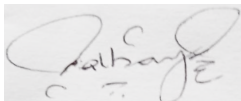
To fulfil our obligations, we ask that you share the following information with us (where available) by January 2<sup>nd</sup>, 2025.

1. The sources of precious metals, diamonds and color stones in aggregate, that you supply to our company. This is specifically the furthest upstream point in the supply chain that the precious metals, diamonds and color stones can be identified as originating from e.g. company, mine or specific geographical area of production (or refiner as a minimum).
2. Evidence that you have undertaken due diligence on the source of precious metals, diamonds and color stones supplied to our company. This could include, for example, copies of any supply chain risk assessments, reports or audits you have done, copies of any company policies you have on responsible sourcing, evidence of participation in responsible sourcing initiatives or programmes.

If you are not in a position to share such information for whatever reason, we will be happy to discuss this with you and find a solution that addresses your concerns and still satisfies our needs.

If you would like to learn more about responsible supply chains or minerals from conflict-affected and high-risks areas, please visit: [www.oecd.org/fr/daf/inv/mne/mining.htm](http://www.oecd.org/fr/daf/inv/mne/mining.htm).

Feel free to contact me at 212-949-2100 Ext 103 or alternatively [owen@sandeepdiamnd.com](mailto:owen@sandeepdiamnd.com)



**OWEN ATHAYDE**  
**COMPLIANCE OFFICER**

November 1st, 2024

**Dear Business Partners,**

**Sub: Implementation of RJC's Code of Practices**

**1. The Responsible Jewelry Council (RJC) is a not-for-profit organization with the following mission:**

*"To advance responsible ethical, social and environmental practices, which respect human rights, throughout the diamond and gold jewelry supply chain, from mine to retail"*

**2. RJC's "Code of Practices" defines responsible ethical, human rights, social, and environmental practices, applicable to all RJC members. The RJC Standards defines an approach for companies to handle and trade gold and platinum group metals in a way that is traceable and responsibly sourced.**

**3. Sandeep Diamond Corporation is a member of RJC and is fully committed to the Code of Practices.**

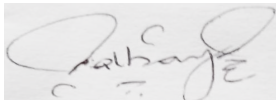
**4. In line with the compliance requirement of RJC and applicable laws, we need to collect specific information about our customers. We request you to provide us with business policy and details of your company and conflict-free/OECD compliant material.**

**5. We also would like to strongly encourage all our business partners to follow and implement the various requirements of the RJC Code of Practices (COP). You can find more information about the Program on the internet site <http://www.responsiblejewellery.com>**

**6. Please feel free to contact us if you need any assistance @ 212-949-2100 x 103**

**7. We would be happy to conduct a training program for your team, on the RJC requirements and steps to be taken for implementation if needed.**

**We look forward to your co-operation in adopting the standard and ensuring that the entire diamond & jewelry industry is seen as a role model in setting high standards with respect to business, social and environmental responsibilities.**



**OWEN ATHAYDE  
COMPLIANCE OFFICER**