



# SANDEEP DIAMOND CORPORATION

## Supply Chain Policy

1. Policy
  - a. We shall establish Policy and Procedure for Supply Chain Due Diligence
  - b. We shall modify our system to facilitate Supply Chain Due Diligence
  - c. We shall have controls to ensure that our supply chain is transparent
  - d. We shall engage with our suppliers to identify any Human Rights issues
  - e. Any Grievance about our suppliers shall be resolved by the Management
  - f. The Policy shall be reviewed and revised as necessary annually
2. Risk Assessment & Red Flags
  - a. The supply chain shall be mapped and associated risks shall be managed
  - b. Risks associated with all major suppliers shall be identified using RJC Toolkit
  - c. Any suspected Human Rights issues shall be Red Flagged and further investigated
  - d. Any confirmation of adverse Human Rights impacts shall result in stoppage of business
3. Risk Response
  - a. Potential Risks identified during risk assessment shall be segregated as:
    - i. High Risk: Needing immediate action and resolution  
(We do not deal with suppliers from CAHRA -Conflict Affected High Risk Areas)
    - ii. Medium: Risks that need to be further investigated and then addressed  
(Dealing with suppliers who are not RJC certified)
    - iii. Low: Management perception that it is acceptable and can live with it for the time being till alternative solutions are found.
  - b. The response shall be in in line with the impact.
4. Third Party Audit
  - a. We shall buy from certified suppliers as far as possible.
  - b. Certification could be:
    - i. Being on LBMA Good Delivery List
    - ii. RJC CoP 2019 Certification
    - iii. DMCC Responsible Supplier List
    - iv. Any other acceptable certification
  - c. Initially about 90% of our supply shall come from Certified suppliers
  - d. The % of certified suppliers will be improved year on year
5. Reporting
  - a. The findings, if any, shall be reported on the website
  - b. If the supply chain is compliant, it shall also be reported on the website.
  - c. In case a concern needs to be raised, follow the Grievance Handling Process
6. Grievance Handling Process
  - a. Anyone can raise a grievance or concern in our supply chain.
  - b. The grievance can be raised on:
    - i. E-mail: [concern@sandeepdiamond.com](mailto:concern@sandeepdiamond.com)
    - ii. Telephone: 800-767-9393



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- iii. Post: 535 Fifth Avenue, 15<sup>th</sup> Floor, New York, NY 10017
- c. The Grievances / Concerns shall be handled at the Top Management Level and the potential impact and action appropriate to the impact shall be implemented. The action could also be to stop any further business with the business associate in case the impact is severe.
- d. Be assured that all the communications will be held in strict confidence and there will be no retaliation of any kind.

SANDEEP SHAH

PRESIDENT

DATED: October 15<sup>th</sup> 2021