



Gold & Diamond SRSP Management Policy & Procedure

Summary

This procedure describes how Company is tracking the gold and Diamonds for the provenance claim about 3TG-SRSP and D-SRSP.

1. Objective

The goal of this procedure is to ensure that the gold is tracked through the company and there is no mix up in non-conflict gold jewelry.

2. Principle

3TG-SRSP

Products are considered "conflict-free" under Dodd-Frank if they do not contain minerals that directly or indirectly finance or benefit armed groups in the "covered countries:" the Democratic Republic of the Congo, Angola, Burundi, Central African Republic, Rwanda, South Sudan, Tanzania, Uganda, and Zambia. The SRSP, Signet Responsible Sourcing Protocol for Gold, Tin, Titanium and Tantalum requires this.

D-SRSP

Products containing Diamonds, the diamonds must be Natural, Untreated and Sourced not from Marange and Mbada mines of Zimbabwe as required by the D-SRSP, besides the diamonds must be conflict free and comply with the requirements of Kimberly Process and World Diamond Council System of Warranties.

Lab Grown Diamonds

The Lab Grown Diamonds shall be disclosed clearly as Lab Grown or CVD. The company does not use Lab Grown Diamonds.

Silver

Products are considered "conflict-free" and responsibly sourced based on the warranties given by the Suppliers of the jewelry and their Provenance Claims approved by RJC.

3. Purpose

To ensure that the gold and diamonds used in the jewelry are in compliance with Signet Responsible Sourcing Protocol for Gold and Diamonds

To ensure that Lab Grown Diamonds are kept segregated and there is no chance of a mix-up.

4. Documents

The Invoices and the declaration of conflict-free gold or Signet Responsible Sourcing Protocol requirements for Diamonds

Separate letter of warranty given by the suppliers of Gold, Silver and Diamonds.



SANDEEP DIAMOND CORPORATION

Lab Grown Diamonds shall be disclosed as such on the invoices. The invoices are from a subsidiary – Affinity Diamonds LLC. Sandeep Diamond corporation does not deal in Lab Grown Diamonds.

5.0 Procedure

The procedure for tracking and managing gold jewelry through the company's processes.

5.1 Jewelry

When the jewelry is purchased from the manufacturer, to ensure that the manufacturer is able to give a declaration about the gold as conflict-free and that the gold was purchased through a LBMA Good Delivery refineries. The diamonds are also with a warranty that they are natural, untreated unless otherwise stated and not from Marange and Mbada Resources of Zimbabwe. Coloured Gemstones also have the treatment disclosed on the purchase Invoices.

5.2 Castings

When the castings are purchased locally, the casting manufacturer must give a declaration to the effect that the gold used in the castings is conflict-free / Complies to the Signet Responsible Sourcing Protocol.

5.3 Diamonds

The locally purchased diamonds shall be with a warranty as per the WDC SoW and also that the diamonds are natural and untreated unless otherwise stated, and not from Marange and Mbada resources of Zimbabwe.

5.4 Lab Grown Diamonds

All the Diamond studded Jewelry Suppliers are required to test the jewellery for undisclosed lab grown diamonds. The loose diamonds and jewelry shall be tested in case they have returned after inspection on the CVD Testing Machine. For certified diamonds, the number shall be checked. The Jewellery and Diamonds will be sent to Lab for checking if the CVD Testing machine returns a refer verdict.

5.5 Sale of Jewelry

On the basis of the warranty of Responsible Sourcing / Conflict Free Gold and Natural Untreated Diamonds given by the supplier, the company shall make a claim that the gold used in the jewelry supplied is conflict-free / complies with the Signet Responsible Sourcing Protocol.

5.6 Complaints Mechanism

The complaints are received by the Marketing Department. The complaints are then investigated and then passed on to the management

5.7 Resolution of Complaints

The complaints shall be resolved by the Management in consultation with the suppliers.

6.0 Trainings

Employees dealing with warranties to customers including the account managers of Sterling / Signet Group shall be given training / refresher trainings.

Sandeep Shah
President

Dated: October 15th, 2021