

Name of Company: Komal Gems NV

Document Name: RJC Manual



Document Number: KG — RJC — 001

Document Validity (YYYY): 2026

RJC Policies and procedures

Document

Doc. No: KG RJC-001

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NEXT REVISION			April 2026

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DOCUMENT APPROVAL

This Policies and Procedures Document (KG-RJC-001) represents the commitment of Komal Gems NV to comply with the requirements of the Code of Practices of the Responsible Jewellery Council.

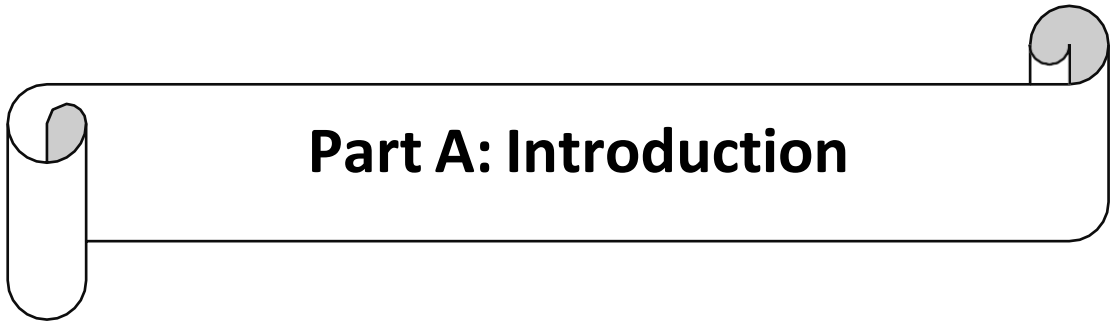
The contents of this document have been reviewed and approved by me.

All employees of Komal Gems NV are required to be familiar with this document and comply with various requirements contained in this document.

I am responsible to make changes / revisions to this document and all employees are advised to bring to my attention any problems that they may face in the implementation of the requirements contained in this document.

Girdharbhai Gajera
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GIRDHARBHAI GAJERA
 Director



Part A: Introduction

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A1 Komal Gems NV seeks to become a certified RJC Member.

A2 This Policies and Procedures document has been developed to demonstrate commitment of the management as well as provide evidence to pipeline directors, consumers and other stakeholders that the activities of Komal Gems NV are in line with the requirements of the Code of Practices (COP) of the Responsible Jewellery Council (RJC).

A3 The policies and procedures described in this document are the outcome of a Risk Assessment carried out for all the processes of Komal Gems NV with reference to the various requirements of the standards.

A4 This document is approved by the Director of Komal Gems NV and is made available to all the employees of the Komal Gems NV.

A5 The entire management system of Komal Gems NV that addresses the requirements of the Responsible Jewellery Council (RJC) COP is contained in the following documents:

Sr.No	Document No.	Documents
1	KG RJC-001	RJC Policies and Procedures Document
2	KG RJC-002	AML and Anti-Bribery Manual
3	KG RJC-003	HSE Manual
4	KG RJC-004	Employee Manual
5	KG RJC-005	Product Security Manual
6	KG RJC-006	Risk Assessment Manual
7	KG RJC-007	Synthetic Diamond Management Procedure

A6 The management reserves the rights to amend, modify, suspend or withdraw at its sole discretion and without reference or concurrence of any other persons, any part of or the entire manual or manuals.

A7 The responsibilities of the RJC allocated coordinator will include the following:

- Ensuring that the requirements of the RJC COP are followed by the company.
- Spreading awareness among all employees about the requirements.
- Carrying out internal assessments and identifying areas of non-conformance.
- Reporting to management on the effectiveness of the implementation process and resolving issues that need management intervention.
- Coordinating with the consultants and external agencies, including the third party auditing agency.



Part B: Business Policies

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B.1 Introduction

This section of the Manual contains the Business Policies that has been adopted by the management of Komal Gems NV. This Business Policies document draws its content from the Responsible Jewellery Council (RJC) Policies and Code of Practices and is intended to achieve the requirements of these standards.

B.2 Business Policies Document

Background

a. At Komal Gems NV our philosophy is to measure success by not only the results we achieve, but also how we achieve them.

b. This Business Policies document, adopted by the management of Komal Gems NV sets forth the basic internal standards to be observed by all directors, officers and employees of the company with respect to conducting business in a legal, ethical, professional and accountable manner.

c. Komal Gems NV shall take appropriate steps to ensure that the same is understood and put into practice by all of its Partners, officers and employees.

d. Komal Gems NV takes appropriate steps to assure adherence to this Business Policies document, including establishing appropriate disciplinary procedures where violations of this document will result in sanctions up to and including discharge.

e. Any amendment to the defined Business Policies will be subject to the approval of the management of Komal Gems NV. No exemption or suspension of these Business Policies in whole or part will be permitted unless approved in advance by the Management of Komal Gems NV.

RJC Compliance Policy

The management of Komal Gems NV, as a party adhering to the standards and practices of the Responsible Jewellery Council (RJC) is committed to complying with the Code of Practices of RJC.

We shall strive to:

- Adhere to ethical business practices.
- Uphold fundamental human rights, treat workers with respect, encourage diverse workforce and provide a safe working environment.
- Promote efficient resources of energy and reduce and prevent pollution.
- Comply with applicable laws in the countries where we operate and manage business risks including contractors, suppliers and directors.

Legislation and Regulations

- a) Komal Gems NV shall operate in compliance with relevant national and international legislations / regulations as applicable to its operations.
- b) All personnel are expected and directed to comply with all applicable laws and regulations as well as all internal company rules and policies relating to their business activities. It also is the responsibility of personnel to know and understand legal, regulatory and internal requirements as they apply to their jobs.

Conducting Business Ethically, with Integrity, and in Fairness.

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- a) Ensuring that all business activities are conducted in an honest, ethical, professional and accountable manner is fundamental to the core philosophy of our company.
- b) Komal Gems NV is committed to combating dishonesty and fraud in all business transactions in order to maintain and enhance consumer trust in, and the reputation of the diamond industry.
- c) Komal Gems NV is committed to maintaining the highest standards of financial integrity for the benefit of all our stakeholders.
- d) All accounting records, and reports produced from those records, must be maintained and presented according to the laws of the country of operation. Komal Gems NV shall ensure compliance with generally accepted accounting policies in the country of operation as well as the company's system of internal controls.
- e) It is the responsibility of Komal Gems NV to pursue its corporate value enhancement through sound business practices. Our business activities have direct and indirect impact on the society in which we operate, and therefore sound business practice requires that business decisions give due consideration to the interests of its stakeholders.
- f) Shareholders, customers, employees, suppliers, business partners, local communities and other companies. All employees must endeavour to conduct the business of Komal Gems NV accordingly.
- g) In making business decisions, employees must act on an informed basis, in good faith, and in the honest belief that the action taken is in the best interest of Komal Gems NV.
- h) Komal Gems NV has put in place programs that monitor the effectiveness of these commitments and hence supporting all workers in this endeavour.

Bribery, Anti-Corruption, Facilitation Payments and Gifts

- a) Komal Gems NV is committed to prohibit bribery in all business practices and transactions that are carried out by the company or on its behalf by business Partners. The company will not offer, accept or countenance any payments, gifts in kind, hospitality, expenses or promises as such that may compromise the principles of fair competition or constitute an attempt to obtain or retain business for or with, or direct business to, any person; to influence the course of the business or governmental decision making process.
- b) Komal Gems NV Considers Bribery Risk as it applies to its organization (including agents) to identify which areas pose high risks. Komal Gems NV has developed appropriate methods to monitor conduct of employees and agents and eliminate bribery based on this understanding.
- c) The management of Komal Gems NV facilitates the reporting of incidences of attempted bribery or inappropriate gifts within their organization and shall apply appropriate sanctions for bribery and attempted bribery in all forms. Komal Gems NV ensures that no employee will suffer demotion, penalty or other adverse consequences for voicing a concern, or for refusing to pay a bribe or facilitation payment even if this action may result in the enterprise losing business.

Money Laundering, Terrorism Financing, Other Financial Offences

- a) Komal Gems NV recognizes the fact that company in the diamond sector have to take on the onus of analysing their potential vulnerabilities to money laundering and implement specific steps that are required for protection against abuse by criminals.

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- b) Strict compliance is required at all times, with all applicable national and, where appropriate, international laws / regulations with respect to money laundering, terrorism financing, bribery, corruption, smuggling, embezzlement, fraud, racketeering, transfer pricing and tax evasion.
- c) Komal Gems NV shall act in accordance with national laws and national / international accounting standards with respect to maintaining financial accounts of all business transactions and auditing of its financial accounts by properly qualified and independent auditors.
- d) Komal Gems NV ensures that concerned employees know and understand the relevant regulatory jurisdiction for national and international transactions, money laundering / financial offences related legal, regulatory and internal requirements as they apply to their jobs. Ignoring or not reporting suspicious activity that appears to be questionable is also considered as a violation of the Business Policies and applicable law.
- e) Komal Gems NV implements a **“Know your Customer”** and **“Know your Supplier”** procedure that establishes the ID company of all organizations with which it deals, have a clear understanding of their business relationships and have a reasonable ability to identify and react to transaction patterns appearing out of the ordinary or suspicious.

Kimberley Process and System of Warranties

- a) Komal Gems NV is fully committed to complying with all the requirements specified in the Kimberley Process Certification Scheme and World Diamond Council's (WDC) System of Warranties Declaration.
- b) The definition of 'Conflict Gem Stone Diamonds' as agreed by the Kimberley Process will be adopted i.e
“Rough diamonds used by rebel movements or their allies to finance conflict aimed at undermining legitimate Governments, as described in relevant United Nations Security Council (UNSC) resolutions in so far as they remain in effect, or in other similar UNSC resolutions which may be adopted in the future, and as understood and recognized in United Nations General Assembly (UNGA) Resolution 55/56, or in other similar UNGA resolutions which may be adopted in the future.”
- c) Wherever applicable, the following affirmative statement as recommended by the World Diamond Council's System of Warranties should be printed on all the invoices:
“The diamonds herein invoiced have been purchased from legitimate sources not involved in funding conflict, in compliance with United Nations Resolutions and corresponding national laws. The seller hereby guarantees that these diamonds are conflict free and confirms adherence to the WDC SOW Guidelines.”
- d) Entering into transactions involving 'conflict diamonds' or not following the System of Warranties Declaration in invoices will be considered as a violation of the Business Policies.
- e) Komal Gems NV ensures that concerned personnel within the organization know about government restrictions on the trade in Conflict Diamonds, the Kimberley Process Certification Scheme and the World Diamond Council System of Warranties.

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Product Security

- a) Komal Gems NV Is committed to establish and implement product security measures within the premises and during shipments to protect against product theft, damage or substitution.
- b) The security and wellbeing of employees, visitors and other relevant business Partners is prioritized when establishing product security measures.
- c) All products sold by Komal Gems NV to consumers shall comply with applicable regulations of product health and safety.

Product Integrity / Disclosure

- a) Komal Gems NV is committed to complying with relevant trading standard legislation and specific national and local regulations applicable to its products.
- b) The following essential Policies will be applicable in all transactions of Komal Gems NV involving natural diamonds.
 - **Disclosure-** Komal Gems NV Shall fully and accurately disclose the material characteristic of their products. All reasonable efforts shall be made to properly disclose all relevant information on the physical characteristics, such as mass/weight, cut, colour, clarity or fineness and the natural origin of a diamond.
 - **Misrepresentation** - No untruthful, misleading or deceptive statement, representation or material omission in the selling, advertising or distribution of any natural diamonds shall be made by the Company in any medium, including the internet.
 - **Diamond Quality** - The weight, colour, clarity or cut of diamonds will be described in accordance with the recognized guidelines appropriate to the particular jurisdiction.
 - Full disclosure i.e. the complete and total release of all available information about a Diamond and all material steps it has undergone prior to sale to the purchaser.
 - No misuse of terminology or mis-representations or attempts to disguise the product will be made in the selling, advertising and distribution of natural diamonds.
 - The word 'diamond' will not be used in the case of names of firms, manufacturers or Trademarks; nor in connection with treated diamonds or diamond simulant or synthetic diamonds. The words "diamond/s" strictly stand for diamonds of natural origin.
- c) Komal Gems NV has adopted the following definitions:

Diamond: A diamond is a natural mineral consisting essentially of pure Carbon crystallized with a cubic structure in the isometric system. Its hardness in the Mohs scale is 10; its specific gravity is approximately 3.52; it has a refractive index of 2.42 and it can be found in many colours.

Synthetic: A synthetic is any object that has been either partially or wholly crystallized or re-crystallized due to artificial human intervention, yet having the same Carbon chemical composition as that of a natural diamond.

Treated Diamond: A treated diamond is any object or product that meets the requirements specified in the definition of the words 'diamond' and 'synthetic' above, but has been subject to some form of treatment i.e. any process, enhancement changing, interfering with and/or contaminating the natural appearance or composition of a diamond other than historically accepted practices of cutting and polishing. This includes colour and decolourisation treatment, fracture filling, laser and irradiation treatment and coating.

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Simulants: A diamond simulant is any object or product used to imitate some or all of the properties associated with a diamond and includes any material, which does not meet the requirements specified in the definition of the word 'diamond' above.

All additional definitions are in correspondence with the international guidelines.

Supply Chain System - Synthetic Diamonds

- a) The company recognizes that diamond industry is at a risk of reputational damage due to undisclosed synthetics being sold to end consumers. Towards this end the company is committed to identify and eliminate the chances of undisclosed diamonds entering its supply chain.
- b) The company is committed to continuously monitor its supply chain for identification of high risk areas and implementing risk control on an ongoing basis.
- c) All relevant employees shall be trained on the requirements and system of pipeline monitoring for undisclosed synthetic detection.
- d) The company shall identify applicable legislation for undisclosed synthetics and initiate appropriate action on detection.

Supply Chain Management / Business Partners

- a) Komal Gems NV considers risks related to business ethics, human rights, social and environmental business practices of significant business Partners which have the potential to impact its own practices arising from such business relationships.
- b) Komal Gems NV is committed to taking appropriate action to use best endeavours to promote responsible business practices among its "business Partners" and to ensure the commitment of business Partners to comply with the Code of Practices.
- c) Komal Gems NV ensures that contractors working in its facilities and visitors are required to comply with its management and operating systems relevant to RJC COP.

Employment

- a) Komal Gems NV complies with applicable national laws / regulations with respect to employment.
- b) Komal Gems NV is committed to maintaining appropriate records as stipulated by the regulatory authorities for all staff employed, whether on a full time, part time or seasonal basis.
- c) Komal Gems NV shall not require workers to work for more than the national limit of hours in a week on a regular basis, with overtime hours not to exceed the national permitted limit per week on a regular basis unless there are legal opt-outs.
- d) Komal Gems NV shall ensure that wages and benefits for a standard working week shall meet at least national minimum standards and shall be sufficient to meet the basic needs of workers. Wages shall be paid to employees on a regular and predetermined basis in a manner and location convenient to employees, accompanied by a wage slip detailing wage rates, benefits and deductions as applicable.
- e) Komal Gems NV shall ensure that due process of wage deductions shall be followed where applicable and it shall not be binding on employees to buy provisions from the company.
- f) When required, due recognition will be given to the existence, membership and lawful activities of worker representative bodies, and worker representatives will be given access to carry out their responsibilities / functions.
- g) Komal Gems NV is committed to addressing the legitimate grievances of its employees.

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- h) Komal Gems NV shall follow proper procedure as per applicable law for dismissal of employees, in case the need for the same arises, and arbitrary dismissal procedures shall be avoided.
- i) Information regarding applicable employment policies and working practices shall be communicated in a transparent manner to all employees.

Health and Safety

Komal Gems NV recognizes the need to develop a sustainable, value creating business and is committed to the following in the areas of workplace health and safety:

- Providing safe and healthy working conditions for all employees in accordance with applicable law and other relevant industry standards.
- Any adverse impact of our business processes on those who carry it out shall be identified and eliminated. Towards this end, we will systematically review our operations to identify sources of health and safety related risks.
- We will provide adequate and appropriate labelling and storage of all chemicals and cleaning materials and adopt methods to protect all employees.
- Our review of our processes will use appropriate standards as required by prevailing laws, expert opinion, feedback from workers and our knowledge of best practices. The review will lead to formulation of clearly described work practices and safety drills and appropriate safeguards and isolation from mobile equipment. All our staff will be trained in the manner required to adhere to these work practices and drills.
- Workers shall not be under the influence of or abusing, drugs, alcohol and/ or other illegal substances.
- We will seek to substitute the use of materials, which are known to cause an adverse impact on the health of workers or health of consumers in the course of its use.
- All workplaces will be constructed to meet safety standards with local regulations as the minimum standards that will be applicable.
- We will take adequate measures to safeguard our employees from fire and other workplace injuries.

Non Discrimination, Discipline and Grievance Procedures

- a) Discrimination can mean distinction, exclusion or preference.
- b) Any form of discrimination relating to the hiring, discharge, pay, promotion, overtime, retirement and training of employees on the basis of race, ethnicity, caste, national origin, religion, age, disability, gender, marital status, physical appearance, sexual orientation, HIV status, Migrant status, membership of worker representative bodies, political affiliations, pregnancy status or any criteria that are unlawful is strongly discouraged by Komal Gems NV and any such reported incidents will be viewed as a serious violation of the Business Policies.
- c) Individuals who are "Fit for Work" shall be accorded equal opportunities and shall not be discriminated against on the basis of factors unrelated to their ability to perform their job.
- d) Komal Gems NV shall not use corporal punishment under any circumstances and will ensure that employees are not subjected to any harsh or degrading treatment, sexual or physical harassment or other forms of mental or physical coercion, abuse or intimidation.

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- e) Komal Gems NV encourages all personnel to voice concerns promptly, if they have a genuine reason to believe that a policy, company operation or practice is or will likely be in violation of any law, regulation or internal company rule or policy, including this Business Policies.
- f) Komal Gems NV assures all employees who come forward in good faith to report issues, that they will be treated fairly and respectfully. While all efforts will be taken to protect the anonymity of employees as far as practicable, any form of retaliation against any such individuals, assuming they have not been involved in the violation, will not be tolerated.

Child Labour

- a) No form of child labour should be employed at Komal Gems NV.
- b) The minimum age for employment that will be applicable is 18 in accordance with applicable laws and guidelines. Policies and procedures for documents and age verification ensure no underage individual is allowed to perform any work on behalf of or at the premises of operation of Komal Gems NV.
- c) The above policies will also be applicable to subcontracted labour.

Forced Labour

- a) The management of Komal Gems NV is fully committed to ensuring that forced or involuntary, bonded, indentured or prison labour, is not practiced nor used in any form at any of its facilities. Komal Gems NV shall ensure that there is no restriction in the freedom of movement of employees and dependents. Any reported incidents relating to forced labour will be considered as a serious violation of this Business Policies.
- b) The following definitions will be applicable:
 - The Universal Declaration of Human Rights that states that ‘No one shall be held in slavery or servitude’
 - ILO Convention 29, which defines forced or compulsory labour as ‘all work or service which is extracted from any person under the menace of any penalty, and for which they said person has not offered himself voluntarily’.

Human Rights

- a) All employees in Komal Gems NV will be treated with equality, respect and dignity.
- b) Komal Gems NV believes in and respects the fundamental human rights according to the United Nations Universal Declaration of Human Rights.
- c) Komal Gems NV will not interfere in the right of employees to observe tenets or practices based on caste, race, national origin, gender, religion, disability, union membership, or political affiliation.
- d) Komal Gems NV prohibits any form of sexually coercive, threatening, abusive or exploitative behaviour.
- e) Any reported incidents relating to direct or indirect physical, sexual, racial, religious, psychological, verbal, or any other form of harassment or abuse, or any other form of intimidation or degrading treatment will not be tolerated by the Company.

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Community Development and Engagement

Komal Gems NV is committed to the development of communities where it operates, contributing to their social and economic welfare.

Environment Performance

Komal Gems NV is committed to effective environmental performance and will focus on the following initiatives:

- Conduct business in an environmentally responsible manner.
- Compliance with all applicable environmental laws and regulations.
- The impact of our operations on the environment will be assessed and reviewed
- Periodically to mitigate or eliminate such impact.
- Disposal procedures for waste generated will be clearly defined and practiced in line with standards that are set by law.
- Improvement of employee environmental awareness and performance through training.
- Efficient use of energy and natural resources to minimize waste generation through efforts that include recycling and prevention of pollution.
- Commitment to a continual improvement process in environmental management.

Provenance Claim

Provenance Claims

The policies relating to this section are part of the Business Principles adopted by Komal Gems NV and is presented below for reference:

“The company shall ensure all its Provenance Claims made will be fully valid along with available evidence to support the Claim(s)”

Origin - Geographical origin of material, for example country, region, mine or corporate ownership of the Mining Facility/ies; and/or

Source - Type of source, for example recycled, mined, artisanal mined, or date of production; and/or

Practices - Specific practices applied in the supply chain relevant to the Code of Practices, including but not limited to, standards applicable to extraction, processing or manufacturing, conflict-free status, or due diligence towards sources.

Provenance Claims may also relate to origin, sources or practices that are specifically `excluded from the supply chain, such as through a ‘negative warranty’.

The company shall ensure that all claims and statements (made to consumers or other businesses) on practices in the supply chain and the origin or source of diamonds through the use of both descriptions and symbols are valid.

The company shall ensure that there will be no attempt to mislead consumers through illustrations, descriptions, expressions, words, figures, depictions or symbols relating to the Provenance Claim(s).

The company shall ensure that all the relevant employees are aware about the provenance claim and its procedures.



Part C: General Requirement



1: Legal Compliance

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Policy Statement

The policies relating to this section are part of the business policies adopted by Komal Gems NV, and are presented below for reference:

To maintain and enhance customer trust in, and the reputation of the diamond and jewellery industry, Komal Gems NV is fully committed to ensuring that all the business processes and transactions are undertaken in a professional, ethical, environment friendly and socially accountable manner. Komal Gems NV has defined and adopted a Business Policies document that sets forth the basic standards to be observed by all Partners, officers and employees. The full text of the Business Policies document is presented in Part B of this manual.

The specific policies of the Company with respect to “Legislation and Regulations” and “Conducting Business Ethically, with Integrity, and in Fairness” are presented below for reference:

Legislation and Regulations

- a. Komal Gems NV. shall operate in compliance with relevant national and international legislations / regulations as applicable to its operations.
- b. All personnel are expected and directed to comply with all applicable laws and regulations as well as all internal company rules and policies relating to their business activities. It also is the responsibility of personnel to know and understand legal, regulatory and internal requirements as they apply to their jobs.

Conducting Business Ethically, with Integrity, and in Fairness

- a. Ensuring that all business activities are conducted in an honest, ethical, professional and accountable manner is fundamental to the core philosophy of our company.
- b. Komal Gems NV is committed to combating dishonesty and fraud in all business transactions in order to maintain and enhance consumer trust in, and the reputation of the diamond industry.
- c. Komal Gems NV is committed to maintaining the highest standards of financial integrity for the benefit of all our stakeholders.
- d. All accounting records, and reports produced from those records, must be maintained and presented according to the laws of the country of operation. Komal Gems NV shall ensure compliance with generally accepted accounting policies in the country of operation as well as the company’s system of internal controls.
- e. It is the responsibility of Komal Gems NV to pursue its corporate value enhancement through sound business practices. Our business activities have direct and indirect impact on the society in which we operate, and therefore sound business practice requires that business decisions give due consideration to the interests of its stakeholders including shareholders, customers, employees, suppliers, business Partners, local communities and other companies. All employees must endeavour to conduct the business of Komal Gems NV accordingly.
- f. In making business decisions, employees must act on an informed basis, in good faith, and in the honest belief that the action taken is in the best interest of Komal Gems NV.
- g. Komal Gems NV has put in place programme that monitor the effectiveness of these commitments and hence supporting all workers in this endeavour.

Compliance to Applicable Legislation and Regulations

Komal Gems NV has implemented a suitable mechanism to ensure compliance with applicable regulatory requirements. The Compliance Register maintained by the company details principal aspects relating to applicable regulations, obligation under each regulation, documentation to be maintained, person responsible, frequency / time period for renewal of licenses or payment of statutory dues and any other relevant information.

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Komal Gems NV has established suitable systems to ensure that information with respect to amendments to applicable regulations and new regulations are kept updated at all times. Specific initiatives include:

- Nomination of specific personnel (Compliance Officer) who are responsible for this activity
- Appointment of consultants who apprise the management on amendments / new regulations
- Regular interaction with accountant and statutory auditor
- Prompt review and analysis of circulars issued by Trade Associations and Regulatory agencies

Financial Reporting and Appointment of Auditors

- a. The annual books of accounts of Komal Gems NV is maintained and audited independently by a qualified auditor as per applicable laws / regulations and acceptable accounting standards in the respective country of operation. Appointment of auditors for Komal Gems NV is governed by the applicable regulations and guidelines in the respective country of operation.

Compliance Monitoring: Ethical Standards

- a. The management of Komal Gems NV has implemented necessary steps to communicate the Business Policies to all concerned personnel, including the disciplinary procedures that will be applicable in the case of violations. This has been done through Training / Awareness Programme.
- b. Komal Gems NV ensures that no practice or conduct is engaged in, that brings the diamond Industry into serious disrepute, including but not limited to the following:
 - Any activity that results in a material criminal conviction.
 - Breaking of the adherence to the Business Policies document.
 - Buying and trading rough diamonds from areas where this would encourage or support conflict and human suffering.
 - Practices which intentionally or recklessly endanger or harm the health and welfare of individuals.
 - Non-compliance with international best practice and the related regulatory framework with respect to environment.
 - Any conduct that seeks to deceive, mislead, cheat or delude the consumer, including:
 - Any undeclared or misrepresented trade in diamonds;
 - Any trade misrepresenting the colour, clarity, carat, cut and provenance of a diamond;

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To ensure commitment to the ethical standards defined and adopted by Komal Gems NV, the following initiatives have been implemented:

- The Directors of Komal Gems NV shall furnish an annual declaration for the financial year.
- Guarantee that they have not been involved in any activity that has resulted in a material conviction or penalty imposed by regulatory authorities in the preceding financial year.
- Guarantee that they have not been involved in any activity that has brought the diamond industry into serious disrepute in the preceding financial year.
- That they have not consciously or knowingly violated any of the provisions of the Komal Gems NV Business Policies in the preceding financial year.

In case, any such person has indulged in any such activity resulting in conviction or penalty, for which no appeal is pending, such person shall inform authorized person and he shall take appropriate measures, including removal of such persons as a Director.

Violations of Komal Gems NV Business Policies and engaging in activity that brings the diamond industry into disrepute will also result in appropriate disciplinary action.

- Komal Gems NV is committed to transparent disclosure to all stakeholders of all material conviction / penalties imposed by Government, industry or other regulator; by way of acceptable means of internal and external communication.

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Document	2 Policy and Implementation	Rev No: 00
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Policy and Implementation (Commitment):

The Company is committed and responsible to demonstrate best business practices both internally to employees and externally to all business Partners and stakeholders. The company believes in compliance with all applicable law, fair and responsible practices in all business activity including compliance with RJC COP 2024.

Policy on (Commitment — Policy and Implementation)

We, the management of the Company, firmly believe in conducting our business with honesty and integrity and in accordance with the highest legal and ethical standards.

The Company ensures that the accounting and financial transaction shall accurately and fairly reflect and in accordance with the General acceptable accounting standards, applicable rules and regulations, accounting practices and policies.

The Company Policy requires Directors, employees and other stakeholders to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Partners, employees and other stakeholders must practice fair dealing, honesty and integrity in every aspect of dealing with other external parties, the business community, shareholders, customers, suppliers and government authorities. No false or misleading statements, written or oral, shall be made to any internal-employees or external-business Partners or stakeholder with respect to the company's compliance with applicable law, rules and regulations.

The Company shall always comply with the industry norms and the guidelines of Kimberly Process certification scheme, World Diamond Council, WFDB.

All persons shall be treated with dignity and respect and they shall not be unreasonably interfered with in the conduct of their duties and responsibilities.

We are committed to human dignity, human rights, and fairness in our employment practices, non-discrimination policies, minimum age requirements, fair compensation policies, and our policies on health, safety, and security for our employees.

The internal audit activity will review management's processes for ensuring compliance with this policy and will determine compliance with the policy as part of its audit and review process.

All stakeholders, business Partners and employees are requested to report any situations or incidents that could lead to the non-compliance of the applicable rules and regulation or breach of the policy. Report all such situations to the Partners of the company or Compliance officer as soon as they come to their attention. We will provide a safe workplace and protect the environment. We will promote the health and well-being of company employees.

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Management Commitment

- a. The company is committed to the fundamental values of integrity, transparency and accountability and aims to create and maintain a trust-based and inclusive internal culture in which non-compliance and breach of applicable rules and regulation is not tolerated. The company is fully committed to adopt best practices and provide a framework for good business practices and risk management strategies for countering unethical practices.
- b. The company is committed to work with the employees to adopt more stringent internal controls, ethics and compliance programmes and measures to prevent and detect unethical business practices.

System and Procedure:

- a. Wherever applicable, in each of the company, a Compliance Officer has been appointed who reports to the Governing Board of the company.
- b. The company has carried risk assessment for relevant operations of the Company to determine the risks of non-compliances and unethical practices with reference to the country of operation, business sectors, business practices and relevant laws.
- c. Elimination and mitigation methods have been developed for business practices with the risk, in line with the company's policy on commitment. Such mitigation methods have been validated with employees by feedback review.
- d. The commitment policy and procedure has been developed, documented and communicated to all employees and relevant interested parties.
- e. The Compliance officer is responsible to conduct periodic internal audits of the system to ensure that the policies and procedures are being followed. The results of the internal audit provide information for review of the systems and procedures. The system shall also review renewed situations posing dangers of best practices and changes in law, to recommend improvements to current practices and/or business principles, wherever that is required.
- f. Periodic training shall be carried out to familiarize employees and interested parties with the company's commitment policies and procedures.
- g. A feedback mechanism where employees and interested parties, including suppliers & subcontractors, can submit their concerns/reports, related to incident or event of non-compliance or breach of commitment policy and procedure, without fear of retaliation has been established. The feedback mechanism provides for investigation of reports and appropriate actions as warranted.
- h. Confidentiality of the employees/interested parties reporting shall be maintained by the company to dissuade any adverse action or retaliation.

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Document	3. Reporting	Rev No: 00
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Reporting:

The company ensures compliance with the reporting requirement pertaining to Responsible business practices. Through reporting the company shall communicate about implemented business practices and its compliances in accordance with RJC COP 2024.

Policy on Reporting

The company is committed to identify relevant issues pertaining to Responsible business practices and RJC Code of Practices, which can disrepute the industry, or be a cause of concern for the interested parties and business Partners.

The company shall do the due diligence process to check the compliance of the General requirements, Responsible Supply Chain and Human Rights, Labour Rights and Working Conditions, Health, Safety and Environment, other Financial and Kimberly Process Certification Scheme and World Diamond Council System of Warranties related requirements.

The company shall establish a mechanism for communication of its reporting practices through personal interaction with relevant business Partners.

The company shall identify relevant issues and prepare an action plan, thus taking necessary action for issue resolutions and compliance to the RJC COP.

The company is committed to sharing relevant qualitative information to the interested parties, where any non-compliance issues are observed.

The company shall ensure effective implementation of the plan for any non-compliance pertaining to Responsible business practices.

Management Commitment:

The company is committed to implement a flexible and practical approach for the implementation of reporting for Responsible business compliances. Companies must follow a generally accepted reporting framework for financial reporting and other relevant business practices.

Systems and Procedure:

The company shall appoint RJC compliance officer to ensure compliance pertaining to reporting. RJC compliance officer shall identify interested parties of relevant issues regarding compliance with the RJC COP 2024.

The company shall communicate effectively with the interested business Partners about reporting and relevant issues or business practices.

The company shall prepare an effective correction plan and monitor implementation for any issues found not following responsible practices.

The company shall adopt a flexible, practical approach to the form and content of the report/communication, taking into account the scale and impacts of the business.

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Document	4. Financial Accounts	Rev No: 00
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Financial Accounts:

The company commits to prepare Financial accounts in accordance with a recognized accounting standard, provide outside parties, such as investors, creditors, regulators, suppliers and other stakeholders, with financial information.

Management commitment:

The financial accounting shall be done based on generally accepted accounting principles (GAAP) of the applicable jurisdiction, which are typically issued by a national standards setting body (such as the Financial Reporting Standards Board for the United States), or by the International Financial Reporting Standards (IFRSs), issued by the International Accounting Standards Board.

Policy Statement on Financial Accounts:

The company shall annually undertake a financial audit, or financial review in jurisdictions where permitted, by an independent qualified accountant.

The company shall maintain financial accounts of all business transactions in accordance with national or international accounting standards.

The management of a company shall responsible for preparing the financial statements, which should be carried out with the oversight of a qualified accountant.

The company shall train the relevant employees on the applicable law and the generally accepted accounting principles (GAAP) for the jurisdictions in which they operate.

The company shall ensure that auditors or reviewers must be independent, in accordance with applicable regulations and professional standards.

The audit or review process provides an opportunity for company management to identify and address risks that could lead to material misstatements in the financial statements, including fraud.

System and Procedure:

The company shall appoint qualified and independent auditor/reviewer for the audit/review of the financial statement of the company. The appointment of the financial auditor shall be done as per applicable relevant law of the country of operation.

The company shall appoint financial auditors/reviewers stating roles and responsibility of the financial auditor and its independence. Similarly, the financial auditor has to accept its appointment and declare his independence as firm and individual.

The company shall get the signed financial information, typically in four basic financial statements - balance sheet, income statement, earnings statement, and cash flow statement in addition to notes to the statements.



**Part D: RESPONSIBLE SUPPLY
CHAIN AND HUMAN RIGHTS**



1: BUSINESS PARTNERS

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Document	5. Business Partners	Rev No: 00
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Business Partners

- Komal Gems NV will consider risks related to business ethics, human rights, and social and environmental business practices of significant Business Partners in the Diamond supply chain, which have the potential to impact the company and/or its supply chain. Based on this Risk Assessment, Komal Gems NV will use their best endeavours, commensurate with their ability to influence, to promote responsible business practices among their own operations and among their Business Partners.

Systems and Procedures

- Komal Gems NV has identified specific personnel who will be responsible on an overall basis for ensuring adherence with respect to the requirements laid down in respect with RJC standards.
- Some of the systems and procedures in place for monitoring compliance to specific requirements of the RJC standard have already been detailed in the relevant sections of this document.
- To monitor compliance on an overall basis, Komal Gems NV has appointed compliance officer that will review the adherence to systems and policies laid down.
- The company will be self-assessed once a year as per a pre-defined time schedule.
- The compliance officer will submit a report to the senior management, highlighting areas of non-compliance, improvement areas and changes to systems / policies (if required).
- The management of the company will take on the responsibility of defining an Action Plan based on the Report and ensure that the suggested corrective actions /improvements / changes are implemented within a reasonable time period as agreed with the Team.
- Komal Gems NV may also from time-to-time engage external consultants to audit the adherence to various systems and policies followed by the company in line with the RJC requirements.

Financial Reporting and Appointment of Auditors

- a. The annual books of accounts of the company are maintained and audited independently by a qualified auditor as per applicable laws / regulations and acceptable accounting standards in the country of operation. To ensure that the appointment of auditors is free of any bias or influence, the following systems and procedures are adopted:
 - Appointment of auditors for company is governed by the applicable regulations and guidelines in the country where the company is incorporated. Before the appointment of the auditor:
 - An undertaking with respect to ‘compliance / qualification’ to audit the company’s book of accounts is obtained from the audit firm
 - Nominated personnel in the company independently verify the applicable regulations / guidelines and inform the management of any non-conformity.

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Document	5. Business Partners	Rev No: 00
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- A formal appointment is sent out to the auditor firm confirming their appointment.

Compliance Monitoring

- a. Komal Gems NV has implemented necessary steps to communicate the Business Principles to all concerned personnel and Business Partners, including the disciplinary procedures that will be applicable in the case of violations. The specific procedures adopted for internal communication include:
 - Circulation of the Code of Conduct in English and other local languages;
 - Training / Awareness Programs.
- b. The Management of Komal Gems NV ensures that no practice or conduct is engaged in, that brings the diamond Industry into serious disrepute, including but not limited to the following:
 - Any activity that results in a material criminal conviction.
 - Breaking of the adherence to the RJC Policies and Procedure document.
 - Buying and trading rough diamonds from areas where this would encourage or support conflict and human suffering.
 - Practices which intentionally or recklessly endanger or harm the health and welfare of individuals.
 - Non-compliance with international best practices and the related regulatory framework with respect to environment.
 - Any conduct that seeks to deceive, mislead, cheat or delude the consumer, including:
 - Any undeclared or misrepresented trade in diamonds;
 - Any trade misrepresenting the colour, clarity, carat, cut and provenance of a diamond;
- c. To ensure commitment to the ethical standards defined and adopted by Komal Gems NV, the following initiatives have been implemented:
 - The Directors of the Komal Gems NV shall furnish an annual declaration for the each financial year.
 - Guarantee that they have not been involved in any activity that has resulted in a material conviction or penalty imposed by regulatory authorities in the preceding financial year.

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Document	5. Business Partners	Rev No: 00
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- Guarantee that they have not been involved in any activity that has brought the diamond industry into serious disrepute in the preceding financial year.
- Guarantee that they have not consciously or knowingly violated any of the provisions of the Komal Gems NV business Principles in the preceding financial year.

In case, any such person has indulged in any such activity resulting in conviction or penalty, for which no appeal is pending, such person shall inform the Management forthwith and the management shall take appropriate measures, including removal of such persons as a Partner. The company strives to engage with reputable Business Partners through completed Risk Assessments and informs its Business Partners of its Policy and Procedures via direct meetings. The company ensures that its Policy and Procedures are available for all its Business Partners.

Violations of the Komal Gems NV Business Principles and engaging in activity that brings the diamond industry into disrepute will also result in appropriate disciplinary action as decided by the Management. Komal Gems NV is committed to transparent disclosure to all stakeholders of all material conviction / penalties imposed by Government, industry or other regulator; by way of acceptable means of internal and external communication.

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Document	6. Human Rights	Rev No: 00
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Policy Statement

The policies relating to this section are part of the Business Policies adopted by Komal Gems NV and is presented below for reference:

- a. All employees in Komal Gems NV will be treated with equality, respect and dignity.
- b. Komal Gems NV believes in and respects the fundamental human rights according to the United Nations Universal Declaration of Human Rights.
- c. Komal Gems NV will not interfere in the right of employees to observe tenets or practices based on caste, race, national origin, gender, religion, disability, union membership, or political affiliation.
- d. Komal Gems NV prohibits any form of sexually coercive, threatening, abusive or exploitative behaviour.
- e. Komal Gems NV does not trade or engage with any parties where any form of violence, human trafficking or any form of abuse or terrorist actions take place.
- f. Any reported incidents relating to direct or indirect physical, sexual, racial, religious, psychological, verbal, or any other form of harassment or abuse, or any other form of intimidation or degrading treatment, will not be tolerated by the Company.
- g. Security personnel, if employed by Komal Gems NV, are trained to respect the human rights and dignity of all people and use of minimum force proportionate to the perceived threat.
- h. The above policies on human rights have been communicated to all employees. The management encourages all employees to report any form of human rights violation and is committed to investigating the issue and initiating corrective action.
- i. Komal Gems NV does not employ any security staff.
- j. The Company ensures that it does not enter into any business transactions with suppliers / customers, when it has 'prior information' of human rights violation by company.

Human trafficking is the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Human trafficking can lead to forced labour.

Policy:

The company firmly believes in strict compliance of human rights and freedom of the human beings.

None of the employees are ever forced to do any inhuman act and they are free to select their occupation, company at any time if they wish to change the job.

The company shall never violate the provision of universal declaration of human rights.

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Document	7. Due diligence for responsible sourcing from CAHRAs	Rev No: 00
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Conflict-Affected Areas

Conflict Areas means armed aggression, widespread violence, and/or widespread human rights abuses.

Conflict-Affected Areas are areas where Conflict is prevalent. The area may be a region, a country, an area within a country, or an area that crosses one or more country boundaries. Operations are not necessarily complicit in Conflict if they are located in a Conflict-Affected Area.

Forms of conflict can include:

- Any forms of torture, cruel, inhuman and degrading treatment;
- Any forms of forced or compulsory labour, which means work or service which is exacted from any person under the means of penalty and for which said person has not offered himself voluntarily;
- The worst forms of child labour;
- Other gross human rights violations and abuses such as sexual violence;
- War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

Management Commitment:

The company ensures that diamond procurement shall be done from the non-conflict areas and the company is committed to not contribute to any conflict areas through its business practices. The company does not engage in diamond procurement from any conflict-affected areas or any areas internationally sanctioned for serious violations in compliance with local guidelines.

Policy on Conflict — Affected Areas:

The company shall monitor the Conflict-affected areas and shall not contribute through their business practices. Identification of conflict areas shall be done by the presence of armed conflict, widespread violence or other risks of harm to people. Some of the worst human rights abuses involving business occur amid conflict over the control of territory, resources or a government itself, where the human rights regime cannot be expected to function as intended.

The company shall make relevant employees aware on the same and shall not deal with the conflict areas. The Companies shall ensure that they do not contribute to conflict, either through their own activities or directly linked to their operations, products or services through their business relationships.

Systems and Procedure

The compliance officer shall verify the each purchase and sales of rough and polished diamonds to ensure that company is not dealing with the conflict affected areas.

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The company shall identify any relevant conflict-affected areas where it may have operations or direct suppliers. To help verify that the company does not operate in, nor source from any conflict-affected areas, the company shall cross-verify the same through various sources like:

- UN Security Council Resolutions. Note if any international sanctions apply, it may not be possible to operate in accordance with Applicable Law.
- UN Peacekeeping Operations.
- US State Department “Conflict Minerals Map” and associated reports required by the Dodd-Frank Act.
- US State Department Country Reports on Human Rights Practices.
- The G7 Diamond Protocol for the Diamond Industry.

Due Diligence for Responsible Sourcing from Conflict-Affected and High-Risk Areas Background

The Company shall carry out due diligence to assess risks related to procurement from the Conflict Affected and High-Risk Areas - CAHRAs. The company does not have any business relationship with parties, associated with the following risks: gross human rights violations, torture, forced or compulsory labour, human trafficking, war crimes, support to non-state armed groups, public or private security forces who illegally control mine sites, bribery and fraudulent misrepresentation of the origin of minerals, money laundering and non-payment of taxes. The company shall carry out a due diligence process to ensure it doesn't have any exposure to nor does it contribute to these risks when sourcing minerals in any form. The company shall use due diligence to inform its partners and all interested parties about its mitigation and risk management.

The Company shall carry out due diligence regarding Conflict Affected and High-Risk Areas (CAHRAs). Those are identified by the presence of armed conflict, widespread violence (including violence generated by criminal networks) or other risks of serious and widespread harm to people. Armed conflict may take a variety of forms, such as conflict of international or non-international character, which may involve two or more states, or may consist of wars of liberation or insurgencies, civil wars, etc. High-risk areas may include areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure and widespread violence. Such areas are often characterized by widespread human rights abuses and violations of national or international law. The company ensures through its systems and business practices that it does not support nor trade with any conflict diamonds.

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Policy and Procedure

This policy confirms Komal Gems NV’s commitment to respect human rights, avoid contributing to the finance of conflict and comply with all relevant UN sanctions, resolutions and laws.

Komal Gems NV strives to become a certified member of the Responsible Jewellery Council (RJC). As such,

we commit to proving, through independent third-party verification, that we:

- respect Human Rights according to the Universal Declaration of Human Rights and International Labour Organization Fundamental Rights at Work;
- do not engage in or tolerate bribery, corruption, money laundering or finance of terrorism;
- do not provide direct or indirect support to illegal armed groups;
- do not engage neither directly nor indirectly in any form of human/sexual trafficking and/or forced labour;
- do not tolerate any form of violence, discrimination or harassment;
- enable stakeholders to voice concerns about the supply chain;
- are implementing the OECD 5-Step framework and risk assessment due diligence for responsible supplying of diamonds.

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Document	7. Due diligence for responsible sourcing from CAHRAs	Rev No: 00
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Regarding serious abuses associated with the transport or trade of diamonds:

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. child labour;
- d. human rights violations and abuses;
- e. war crimes, violations of international humanitarian law, crimes against humanity or genocide.

Regarding direct or indirect support to non-state armed groups:

We only sell or purchase diamonds that are fully compliant with the Kimberley Process Certification Scheme and, as such, will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring diamonds 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 are traded and upstream actors in the supply chain; or
- b) tax or extort money or diamonds at mine sites, along transportation routes or at points where diamonds are traded, or from intermediaries, export companies or international traders.

Regarding public or private security forces:

We will not offer, promise, give or demand bribes, and will not tolerate the solicitation of bribes, nor any concealing or disguise the origin of diamonds, or to misrepresent taxes, fees and royalties paid to governments for the purposes of trade, handling, transport and export of diamonds.

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 trade, handling, transport or export of diamonds.

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Document	7. Due diligence for responsible sourcing from CAHRAs	Rev No: 00
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Procedure

The management of the company and compliance officer shall train relevant employees to ensure compliance with OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

The company has a grievance system and business partners can register a grievance through contact details mentioned on the invoice.

The company shall carry out review of its risk assessment once in year and wherever possible, if high-risk supplier is identified, such shall be immediately reported and/or replaced at appropriate level internally and/or externally with mitigation procedures determining potential final termination of the business if our responsibility requirements are not met.

The company shall communicate to its suppliers at regular interval and also verify details of the supplier in public domain.

The company shall carry out risk assessment on OECD due diligence and responsible supply chains and maintain records of risk assessment.

Komal Gems NV communicates this sourcing policy to our suppliers and customers and makes it publicly available for review. Additionally, Komal Gems NV requires the customer to acknowledge the policy and commit to providing information, documentation, and accommodations for site visits as necessary to complete our due diligence as outlined in our basic due diligence and enhanced due diligence policies.

If Komal Gems NV should discover, through its ongoing due-diligence that our customer is engaging in suspect practices or practices do not meet our responsible sourcing requirements, we would immediately suspend sourcing from the identified supplier and develop a plan to mitigate the identified risks. Should the mitigation fail to resolve a matter to our satisfaction or we uncover activities which indicate extreme abuses, dishonesty, or situations where a supplier is unwilling to assist in our due-diligence, komal Gems NV will immediately discontinue any activity with that entity.

Komal Gems NV is also committed to be audited by an independent third party to ensure adequate testing of the system to ensure that the verification and documentation process is secure. Through these audits, Komal Gems NV displays transparency and our customers gain audit-based assurance that Komal Gems NV 's supply chain due diligence policy is verifiable and effective.

The company shall review this policy on yearly basis or if there is a change in sourcing practices.

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Document	8.Sourcing from Artisanal and Small Scale Mining	Rev No: 00
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Sourcing from Artisanal and Small Scale Mining

Artisanal and Small-Scale Mining (ASM) are formal or informal operations with predominantly simplified forms of exploration, extraction, processing and transportation. ASM is normally low capital intensive and uses high labour-intensive technology.

ASM can include men and women working on an individual basis as well as those working in family companies in partnership or as members of cooperatives or other types of legal associations and enterprises involving hundreds or thousands of miners. Komal Gems NV does **not** source from Artisanal and Small Scale Mines.

Management commitment:

At Komal Gems NV, we feel we are responsible for respecting human rights and applying due diligence. Therefore, we do **not** practice any sourcing from Artisanal and Small-Scale Mining (ASM). The companies with direct sourcing relationships are in the best position to assess risks and, as customers, to work directly with their suppliers to provide for or cooperate in remediation of identified impacts wherever possible.

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Document	9. Sourcing Post-Consumer industrial precious metals directly from informal recyclers	Rev No: 00
KG-RJC-001		Date: 20/01/2026

System and Procedure

Not Applicable: Komal Gems NV trades solely in rough and polished natural diamonds, therefore no sourcing or trading of precious metals takes place in any form.

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Document	10.Community Development	Rev No: 00
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Policy Statement

The policies relating to this section are part of the Business Policies adopted by Komal Gems NV and are presented below for reference:

Komal Gems NV is committed to the development of communities where it operates, contributing to their social and cultural welfare:

Komal Gems NV actively participates in different types of community development programs organized by the diamond trading fraternity in the respective country of operation.

Its support to the cultural life of the related communities is highlighted through annual contributions.

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Document	11. Bribery & Facilitation	Rev No: 00
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Policy Statement

The policies relating to this section are part of the Business Policies adopted by Komal Gems NV and are presented below for reference:

- a. Komal Gems NV is committed to prohibit bribery in all business practices and transactions that are carried out by the company or on its behalf by Business Partners. The company will not offer, accept or countenance any payments, gifts, hospitality, expenses or promises as such that may compromise the principles of fair competition or constitute an attempt to obtain or retain business for or with, or direct business to, any person; to influence the course of the business or governmental decision — making process.
- b. Komal Gems NV considers Bribery Risk as it applies to its organization (including agents) to identify which areas pose high risks. Komal Gems NV has developed appropriate methods to monitor conduct of employees and agents and eliminate bribery based on this understanding.
- c. The management of Komal Gems NV facilitates the reporting of incidences of attempted bribery or inappropriate gifts within their organization and shall apply appropriate sanctions for bribery and attempted bribery in all forms.
- d. Komal Gems NV ensures that no employee will suffer demotion, penalty or other adverse consequences for voicing a concern, or for refusing to pay a bribe or facilitation payment even if this action may result in the enterprise losing business.

Management Commitment

- a. Komal Gems NV is committed to the fundamental values of integrity, transparency and accountability in which bribery and facilitation payment is not tolerated.
- b. This includes identification of “direct or indirect” means of bribery (or attempts to bribe) within its operations, in direct contact with third parties and bribery and facilitation payments carried out through agents and intermediaries.
- c. Komal Gems NV has identified applicable national and international legislations/regulations relating to prevention of bribery and facilitation payments, to comply with.
- d. Komal Gems NV shall periodically review policies and approach on bribery and facilitation payments. It is committed to provide effective channels for employees to report suspected bribery and facilitation payment in the company, and for protecting whistle blowers from retaliation. Komal Gems NV is committed to work with the employees to adopt more stringent internal controls, ethics and compliance programmes and measures to prevent and detect bribery.

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System and Procedure:

- a. Komal Gems NV has carried out risk assessment for relevant operations of the company to determine the risks of bribery.
- b. Elimination and mitigation methods have been developed for business practices with the risk of bribery, in line with the company policy on bribery.
- c. An AML (Anti-Money-Laundering) document has been developed and communicated to all employees.
- d. A review system has been established to monitor the implementation of identified practices of the anti-bribery-facilitation payment program. The system shall also review renewed situations posing dangers of bribery and facilitation payment, best practices and changes in law, to recommend improvements to current practices and/or business Policies.
- e. Periodic training shall be carried out to sensitize employees and interested parties with the company anti-bribery-facilitation payment policies and procedures.
- f. A feedback mechanism wherein employees and interested parties including suppliers & subcontractors can submit their concerns/reports related to suspected bribe and inappropriate gift requests, without fear of retaliation has been established. The feedback mechanism provides for investigation of reports and appropriate actions as warranted.
- g. Confidentiality of the employees/interested parties reporting bribery/facilitation payment shall be maintained by the company or responsible institutions to dissuade any adverse action or retaliation.

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Document	12. Know your counterparty: Money Laundering and Finance of Terrorism	Rev No: 00
KG-RJC-001		Date: 20/01/2026

Policy Statement

The policies relating to this section are part of the Business Policies adopted by Komal Gems NV, and are presented below for reference:

- a. Komal Gems NV recognizes the fact that company in the diamond sector have to take on the onus of analysing their potential vulnerabilities to money laundering and implement specific steps that are required for protection against abuse by criminals.
- b. Strict compliance is required at all times, with all applicable national and, where appropriate, international laws / regulations with respect to money laundering, terrorism financing, bribery, corruption, smuggling, embezzlement, fraud, racketeering, transfer pricing and tax evasion.
- c. Komal Gems NV. shall act in accordance with national laws and national / international accounting standards with respect to maintaining financial accounts of all business transactions and auditing of its financial accounts.
- d. Komal Gems NV ensures that concerned employees know and understand the relevant regulatory jurisdiction for national and international transactions, money laundering / financial offences related legal, regulatory and internal requirements as they apply to their jobs. Ignoring or not reporting suspicious activity that appears to be questionable is also considered as a violation of the Business Policies.
- e. Komal Gems NV implements a “Know your Customer” and “Know your Supplier” procedure that establishes the ID company of all organizations with which it deals, have a clear understanding of their business relationships and have a reasonable ability to identify and react to transaction patterns appearing out of the ordinary or suspicious.

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Document	12. Know your counterparty: Money Laundering and Finance of Terrorism	Rev No: 00
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Management Commitment

- a. Komal Gems NV is fully committed to combating all forms of activities relating to money laundering, terrorism financing and other financial offences.
- b. Komal Gems NV has identified the applicable national and international legislations / regulations relating to money laundering, terrorism financing and other financial offences, which must be complied with.

As a part of the annual statutory audit program, the independent financial auditors of Komal Gems NV are made aware of the applicable laws relating to money laundering, terrorism financing and financial offences. To review and assess the adequacy of and level of compliance with the company Anti Money Laundering/ CFT Program, periodic internal audits are conducted. This audit is conducted by respective Compliance officer of Komal Gems NV.

- c. The systems and procedures followed for appointment of auditors are detailed in Section 1.1.3 (Part C) of this document.

Systems and Procedures

- a. Komal Gems NV has implemented ‘Know Your Customer’ and ‘Know Your Supplier’ programs for purchase and sale of rough and polished diamonds.
- b. Komal Gems NV has an established Anti-Money Laundering (AML) guide and Procedure, reviewing the risk levels for transactions with different parties. Based on that, business either takes place as assessed as low/medium risk or does not take place if severe non- conformances/red flags are identified. Reporting follows as per applicable law if required.
- c. Komal Gems NV strongly encourages payments through bank transfers. In rare cases where cash transactions take place, the company respects the cash limit of 3000 Euros and neither pays nor receives cash for an amount higher than 3000 euros within Belgium, as per national applicable law. Every payment in case where at least one of the parties resides or has activities in Belgium, is deemed to have been carried out on Belgian territory.
- d. If Komal Gems NV does or receives a payment in cash abroad where another cash limit applied, the company can prove by all means that he indeed received or paid this cash abroad. The minimum requirements include the client/supplier signature on the invoice, where the counterparty declares what they paid/received in that country.
- e. The management has appointed Financial Compliance Officer of Komal Gems NV who is responsible to ensure that all the applicable regulations with respect to reporting cash and non-cash equivalents to the relevant Regulatory Bodies are fully adhered to.
- f. To ensure traceability of its financial transactions, Komal Gems NV follows a policy of maintaining all relevant documents for a minimum period of five years as required by National regulations.

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g. The Compliance Officer of the company is responsible for maintaining and regularly updating a list of suspicious transactions that may be categorized as 'red flags' i.e. transactions that may be designed to facilitate money laundering or terrorist financing. On detection of a 'Red flag', the Compliance Officer of the company is responsible for Verifying the same and if required, reporting the 'red flag' to appropriate regulatory authorities.

In the event of reporting of a 'Red Flag' to regulatory authorities, the Compliance Officer will initiate the following steps:

- Inform all the concerned personnel that all transactions with the particular supplier or customer should be immediately suspended until further notice.
- To prevent use, ensure that all stock material lying with the company (in case of supplier) are collected and stored separately in safe custody.
- Stop payment (wherever possible) of all in-process financial instruments.
- Inform the concerned supplier or customer, that the company has taken the above steps as required by applicable legislations / regulations.
- Based on feedback obtained from regulatory authorities, decide whether normal transactions should be suspended permanently or can be commenced with or without restrictions.

The Compliance Officer is responsible for checking specific Government lists of individuals, terrorists, and countries that are categorized as 'high risk' for business transactions.

Training of Personnel

- a. The Compliance Officer is responsible to identify the personnel (depending on their job responsibilities) who are required to be familiar with all aspects relating to combating money laundering, terrorism financing and other financial offences.
- b. In addition to the above formal programs, the Compliance Officer also ensures that relevant information updates are communicated to concerned personnel by way of internal memos, training sessions or electronic mail.

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Document	13. Security	Rev No: 00
KG-RJC-001		Date: 20/01/2026

Policy Statement

- a. Komal Gems NV is committed to establish and implement personnel and product security measures within the premises and during shipments with insurance coverage by trusted industry companies to protect against product theft, damage or substitution.
- b. Security is not employed by the company, but rather by the building management for all the offices in the Antwerpsche Diamantkrink Bourse, ensuring adequate measures are in place with regards to Human Rights.
- c. The security and wellbeing of employees, visitors and other relevant Business Partners is prioritized when establishing product security measures.
- d. All products sold by Komal Gems NV to consumers shall comply with applicable regulations of product health and safety.

Systems and Procedures

- a. Komal Gems NV has carried out a risk assessment of all its activities for susceptibility to product theft, damage or substitution. Identified risks have either been eliminated or mitigation systems have been put into place.
- b. Komal Gems NV has identified the processes wherein security risk of the product due to theft / damage / switching can occur. For each stage and risk involved, appropriate controls have been laid down to address product security. The stages, risks and controls are as follows:

Sr. No.	Operational Stage	Risk	Control
1	Polished diamonds transported from supplier to our premises	Theft	Goods are insured by the supplier company. All staff insured while at work or on their way to work from home or to home from work.
2	Polished diamonds receipt from supplier	Theft	<ul style="list-style-type: none"> • Check weight against supplier from supplier document; • Weight verification done under close supervision of senior management personnel; • CCTV coverage of receipt area • In case of variation, take up with courier / supplier / insurance agency. • All staff insured while at work or on their way to work from home or to home from work.
3	Rough / Polished diamonds storage	Theft	<ul style="list-style-type: none"> • Store in strong safes, lockers; • Limited access of persons to such safes; Keys with designated senior management staff.

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Document	13. Security	Rev No: 00
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4	Preparing packets for further issue	Theft	<ul style="list-style-type: none"> Limited access of persons for such preparation; Checking of weights of each packet and tallying with total weight; Lot Number and Weight of each packet mentioned on the packet; Weight of each packet entered into the computer system; Store such packets in strong safes / lockers till they are issued; CCTV coverage.
5	Inspection of rough / polished diamonds by potential customers and finalization of sale	Theft substitution	<ul style="list-style-type: none"> CCTV coverage; Supervision of sales person.
6	Packing and preparation of documents	Theft Substitution	<ul style="list-style-type: none"> CCTV Coverage; Supervision of sales person; Providing accurate information to accounts for raising invoices.
7	Handing over goods to Customs / Dispatch of goods	Theft	<ul style="list-style-type: none"> Through authorized security agencies; All staff insured while at work or on their way to work from home or to home from work. Insurance.

- c. All concerned employees have been trained on the above procedures. It has been conveyed to all employees that their lives are more important than the product.
- d. Komal Gems NV has ensured a review process wherein in case of any changes to the processes or introduction of new process that may impact the risk of theft, damage or substitution, adequate measures are implemented.

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Document	14. Provenance Claims	Rev No: 00
KG-RJC-001		Date: 20/01/2026

Provenance Claims

Policy Statement

The policies relating to this section are part of the Business Principles adopted by Komal Gems NV and are presented below for reference:

- a. The company shall ensure all its Provenance Claims made will be fully valid along with available evidence to support the Claim/s.

Origin - Geographical origin of material, for example country, region, mine or corporate ownership of the Mining Facility/ies; and/or country of manufacturing.

Provenance Claims may also relate to origin, sources or practices that are specifically excluded from the supply chain, such as through a 'negative warranty'.

- b. The company shall ensure that all claims and statements (made to consumers or other businesses) on practices in the supply chain and the origin or source of diamonds through the use of both descriptions and symbols are valid.
- c. The company shall ensure that there will be no attempt to mislead consumers through illustrations, descriptions, expressions, words, figures, depictions or symbols relating to the Provenance Claim(s).
- d. The company shall ensure that all the relevant employees are aware about the Provenance Claim(s) and its procedures.

Management Initiatives

In line with the Provenance Claims Requirement, the Company has implemented the following initiatives: The Company is committed to ensuring that its operations are fully compliant with the requirements regarding Provenance Claims.

A statement that the Provenance Claims Policy will be communicated to all employees through training. Written procedure, training materials and meeting training records. The company shall regularly interact with the relevant employees to explain the requirements of Provenance Claims.

The company shall prepare Procedures for validating Provenance Claim(s) and maintaining supportive evidence and ensure documented criteria/requirements that are consistent with the Claim(s).

The company shall ensure the implementation of Complaints or Grievance Mechanism. Records of complaints or grievances relating to Provenance Claim(s) are monitored to ensure compliance.

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**Part E: LABOUR RIGHTS AND
WORKING CONDITIONS**

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1: General Employment Terms

Policies and procedures	PART E - Labour Rights and Working Conditions	Page:- 45 of 63
Document	15. General Employment	Rev No: 00
KG-RJC-001		Date: 20/01/2026

Policy Statement

- a. Komal Gems NV Complies with applicable national laws / regulations with respect to employment.
- b. Komal Gems NV is committed to maintaining appropriate records as stipulated by the regulatory authorities for all staff employed, whether on a full time, part time or seasonal basis.
- c. Komal Gems NV shall not require workers to work for more than the national limit of hours in a week on a regular basis, with overtime hours not to exceed the national permitted limit per week on a regular basis unless there are legal opt-outs.
- d. Komal Gems NV shall ensure that wages and benefits for a standard working week shall meet at least national minimum standards and shall be sufficient to meet the basic needs of workers.
- e. Wages shall be paid to employees on a regular and predetermined basis via bank transfer, accompanied by a wage slip detailing wage rates, benefits and deductions as applicable.
- f. Komal Gems NV shall ensure that no unlawful wage deductions shall be carried out as a way of compensation or retaliation and it shall not be binding on employees to buy provisions from or for the company.
- g. When required, due recognition will be given to social work association/trade union memberships and lawful activities of worker representative bodies, and worker representatives will be given access to carry out their responsibilities / functions.
- h. Komal Gems NV is committed to properly addressing the grievances of its employees.
- i. Komal Gems NV shall follow proper procedure as per law for dismissal of employees, in case the need for the same arises, and arbitrary dismissal procedures shall be avoided.
- j. Information regarding applicable employment policies and working practices shall be communicated in a transparent manner to all employees.

Komal Gems NV is fully committed to the pursuit of the provision of fair employment conditions, consistent with applicable laws and regulations.

Komal Gems NV has entrusted the task of maintaining employee records and salary payments to its employees to an external organization.

In addition to the policies defined in the Business Policies and compliance to applicable national employment and labour related legislations / regulations, the following procedures are applicable:

- Employment commences only after an Employment Contract has been handed over to the prospective employee and a written confirmation of the acceptance of terms and conditions of employment is received from the employee.

Policies and procedures	PART E - Labour Rights and Working Conditions	Page:- 46 of 63
Document	15. General Employment	Rev No: 00
KG-RJC-001		Date: 20/01/2026

- Payment and remuneration details are agreed upon before the commencement of employment and specified in the Employment Contract.
- No deductions from salaries or wages will be made as a disciplinary measure.

Grievance Procedure — under normal working conditions, employees who have a job-related problem, question or complaint should first discuss it with their immediate supervisor. At this level, employees usually reach the simplest, quickest, and most satisfactory solution. If the supervisor cannot solve the problem, the company encourages employees to contact the Partner whose decision in the matter is final (Managerial or Director level).

Komal Gems NV has communicated the various employment policies and procedures to all employees.

Staff Meetings: To ensure transparent and healthy communications between the management and staff / workers, periodic staff meetings are held between the forementioned parties. These meetings are designed to inform employees on recent company activities, changes in the workplace, health / safety issues, and obtain feedback from employees on improvements, problems, etc.

Policies and procedures	PART E - Labour Rights and Working Conditions	Page:- 47 of 63
Document	16,17. Working Hours and Remuneration	Rev No: 00
KG-RJC-001		Date: 20/01/2026

Working hours:

The management of the company believes working hours are a fundamental component of safe and humane working conditions. The normal full-time work week is of 38 hours, in accordance with Belgian law, or any number of fewer normal maximum weekly hours that are set either by national or local law or a collective bargaining agreement.

Management Commitment:

We are committed to ensuring the standard weekly rest and paid annual leave, as well as the respective national holidays in accordance with local law.

Policy on Working hours and Remuneration:

- The company shall follow the relevant applicable law pertaining to working hours and remuneration.
- Effective mechanism shall be established to ensure compliance of employment terms and applicable provisions.
- Overtime work is requested under a voluntary overtime system. Required overtime is permitted only where it is within the limits allowed under applicable law or collective bargaining agreements.
- The sum of the normal work week and overtime hours in a week shall not exceed the working hours subject to applicable national law or collective bargaining agreements.
- The company shall comply with the working hours, overtime, leave, weekly off and other relevant provisions of applicable law.

System and Procedure

The company shall establish effective mechanism to ensure compliance with the relevant applicable law. The company shall assign responsibility for setting and overseeing remuneration to a senior management function.

All the employees shall get their remuneration according to provision of law (via bank transfer) and in convenient manner to them.

Policies and procedures	PART E - Labour Rights and Working Conditions	Page:- 48 of 63
Document	18. Harassment, discipline, grievance procedures and non-retaliation	Rev No: 00
KG-RJC-001		Date: 20/01/2026

Policy Statement

The policies relating to this section are part of the Business Policies adopted by Komal Gems NV and are presented below for reference:

- a) Komal Gems NV shall not use corporal punishment under any circumstances and will ensure that employees are not subjected to any harsh or degrading treatment, sexual or physical harassment or other forms of mental or physical coercion, abuse or intimidation. Both direct and indirect harassment in any form is not acceptable in workplace facilities.
- b) Komal Gems NV shall ensure that all employees are treated with dignity and respect and are not subjected to harassment or violence, or threatened with these towards themselves, their family or colleagues.
- c) Komal Gems NV encourages all personnel to voice concerns promptly, if they have a genuine reason to believe that a policy, company operation or practice is or will likely be in violation of any law, regulation or internal company rule or policy, including this Business Policies. Komal Gems NV assures all employees who come forward in good faith to report issues, that they will be treated fairly and respectfully.
- d) The established Grievance Mechanism allows all employees and business partners to voice their concerns to the highest company level should any non-conformance of the up-mentioned principles take place.
- e) Komal Gems NV is committed to addressing the legitimate grievances of its employees.
- f) To ensure that, the company has established Registers for both internal and external grievances/complaints, allowing for anonymity and suggestions for improvement.
- g) Komal Gems NV accepts grievances and suggestions both electronically through official email: info@komalgems.eu or telephone +3232264281 for office or +32475449673 for director, in person with the director at: Hovenierstaat 2, Office 619, Bus 347, 2018 Antwerpen, Belgium, or physically through our Grievance/Complaints Register located in our office at the up-mentioned address.
- h) To ensure that any grievances have been addressed at top level, continuous monitoring is in place and all grievances are registered in the fore-mentioned Register, where they can be promptly reviewed at director level and signed off as addressed.
- i) Komal Gems NV ensures that all efforts will be taken to protect the anonymity of employees as far as practicable and any form of retaliation against any such individuals, assuming they have not been involved in the violation, will not be tolerated.

Policies and procedures	PART E - Labour Rights and Working Conditions	Page:- 49 of 63
Document	19. Child Labour	Rev No: 00
KG-RJC-001		Date: 20/01/2026

Policy Statement

- a. No form of child labour should be employed Komal Gems NV.
- b. The minimum age for employment that will be applicable is 18 (As per ILO Convention No. 138 for full-time full age employment).
- c. The above policies will also be applicable to subcontracted labour.

To ensure effectiveness of the above policies, Komal Gems NV obtains age proof of all its employees at the time of their recruitment.

Policies and procedures	PART E - Labour Rights and Working Conditions	Page:- 50 of 63
Document	20. Forced Labour	Rev No: 00
KG-RJC-001		Date: 20/01/2026

Policy Statement

The policies relating to this section are part of the Business Policies adopted by Komal Gems NV and are presented below for reference:

- a. The management of Komal Gems NV is fully committed to ensuring that forced or involuntary, bonded, indentured or prison labour, is not practiced nor used in any form at any of its facilities. Komal Gems NV shall ensure that there is no restriction in the freedom of movement of employees and dependents. Any reported incidents relating to forced labour will be considered as a serious violation of this Business Policies.
- b. The following definitions will be applicable:
 - The Universal Declaration of Human Rights that states that ‘No one shall be held in slavery or servitude’.
 - ILO Convention 29, which defines forced or compulsory labour as ‘all work or service which is extracted from any person under the menace of any penalty, and for which the said person has not offered himself voluntarily’.

To ensure effectiveness of the above policies relating to forced or compulsory labour, the following guidelines are applicable to Komal Gems NV:

- No employee is required to lodge deposits or ID company papers.
- All employees are free to resign at any time after serving the required notice period specified in the terms and conditions of appointment.
- Leave is provided to all employees as per applicable national legislation. In the case of emergencies, employees are free to leave their workplace immediately after informing their immediate supervisor.
- Relatives and friends are free to contact the employees by phone and visit them at the workplace in case of emergencies or any other genuine problems.
- Overtime is voluntary and as far as possible is informed to the employee in advance.

Policies and procedures	PART E - Labour Rights and Working Conditions	Page:- 51 of 63
Document	21. Freedom of Association and Collective Bargaining	Rev No: 00
KG-RJC-001		Date: 20/01/2026

Policy Statement

The policies relating to this section are part of the Business Policies adopted by Komal Gems NV and are presented below for reference:

- a. Komal Gems NV will not prevent employees from associating and collective bargaining.
- b. In accordance with national applicable law, employees are free to take part in trade unions and similar joint associations and the company's policies respects the employee's freedom of association and their right to be represented by trade unions for the purposes of drawing collective bargaining agreements, where applicable.

Policies and procedures	PART E - Labour Rights and Working Conditions	Page:- 52 of 63
Document	22. Non Discrimination	Rev No: 00
KG-RJC-001		Date: 20/01/2026

Policy Statement

- The policies relating to this section are part of the Business Principles adopted Komal Gems NV and are presented below for reference:
 - Discrimination can mean distinction, exclusion or preference.
 - Any form of discrimination relating to the hiring, discharge, pay, promotion and training of employees on the basis of race, ethnicity, caste, national origin, religion, age, disability, gender, marital status, physical appearance, sexual orientation, HIV status, Migrant status, membership of worker representative bodies, political affiliations, or any criteria that are unlawful, is prohibited by Komal Gems NV and any such reported incidents will be viewed as a serious violation of this Business Policies.
 - Individuals who are “Fit for Work” shall be accorded equal opportunities and shall not be discriminated against on the basis of factors unrelated to their ability to perform their job.
 - Komal Gems NV shall not use corporal punishment under any circumstances and will ensure that employees are not subjected to harsh or degrading treatment, sexual or physical harassment or other forms of mental or physical coercion, abuse or intimidation.
 - Komal Gems NV encourages all personnel to voice concerns promptly, if they have a genuine reason to believe that a policy, company operation or practice is or will likely be in violation of any law, regulation or internal company rule or policy, including this Business Policies. Komal Gems NV assures all employees who come forward in good faith to report issues, that they will be treated fairly and respectfully. While all efforts will be taken to protect the anonymity of employees as far as practicable, any form of retaliation against any such individuals, assuming they have not been involved in the violation, will not be tolerated.

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**PART F — HEALTH & SAFETY
- ENVIRONMENTS**

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1: Health and Safety

Policies and procedures	PART F — Health Safety and Environments	Page:- 54 of 63
Document	23. Health and Safety	Rev No: 00
KG-RJC-001		Date: 20/01/2026

Policy Statement

The policies relating to this section are part of the Business Policies adopted by Komal Gems NV and are presented below for reference:

Komal Gems NV recognizes the need to develop a sustainable, value creating business and is committed to the following in the areas of workplace health and safety:

- a. Providing safe and healthy working conditions for all employees in accordance with applicable law and other relevant industry standards.
- b. Any adverse impact of our business processes on those who carry it out shall be identified and eliminated. Towards this end, we will systematically review our operations to identify sources of health and safety related risks.
- c. We will provide adequate and appropriate labelling and storage of all chemicals and cleaning materials and adopt methods to protect employees from exposure to chemical fumes.
- d. Our review of these processes will use appropriate standards as required by prevailing laws, expert opinion, feedback from workers and our knowledge of best practices. The review will lead to formulation of clearly described work practices and safety drills and appropriate safeguards. All our staff will be trained in the manner required to adhere to these work practices and drills.
- e. Workers shall not be under the influence of or abusing, drugs, alcohol and/ or other illegal substances.
- f. We will seek to substitute the use of materials, which are known to cause an adverse impact on the health of workers, consumers or the environment in the course of its use.
- g. All workplaces will be constructed to meet safety standards with local regulations as the minimum standards that will be applicable.
- h. We will take adequate measures to safeguard our employees from fire and other workplace injuries.
- i. Komal Gems NV is fully committed to the pursuit of applicable standards of health and safety, and the provision of a safe and healthy working environment for all its employees.
- j. In Komal Gems NV, the responsibility for managing various issues relating to health and safety has been assigned to a representative from management level.
- k. Komal Gems NV maintains work place hygiene at its office.
- l. Komal Gems NV operates from an office that is part of a building. The building management team is responsible for maintenance and upkeep of the building.

Komal Gems NV takes care of the following within its premises:

- a. Provision of a first-aid kit.
- b. Provision of firefighting equipment.
- c. Collection and disposal of waste according the local regulations.
- d. The building management team takes care of establishing universal evacuation plans and general maintenance of building.

The company has established an emergency evacuation plan consisting of evacuation layout and emergency alarm. The employees have been trained to raise alarm and evacuation of staff and customers- if any, from the premises. Staff has been instructed to use staircases in case of fire emergency.

Policies and procedures	PART F — Health Safety and Environments	Page:- 55 of 63
Document	24. Environment Management	Rev No: 00
KG-RJC-001		Date: 20/01/2026

Policy Statement

The policies relating to this section are part of the Business Policies adopted by Komal Gems NV, applicable to company and are presented below for reference:

Komal Gems NV is committed to:

- a. Conducting business in an environmentally responsible manner.
- b. Compliance with all applicable environmental laws and regulations.
- c. The impact of our operations on the environment will be assessed and reviewed periodically to mitigate or eliminate any adverse impact.
- d. Disposal procedures for waste generated will be clearly defined and practiced in line with standards that are set by applicable law.
- e. Efficient use of energy and natural resources to minimize waste generation through efforts that include recycling and prevention of pollution.
- f. Recycling and reusing of materials, wherever possible.
- g. Conservation of natural resource — paper, electricity, water etc. wherever possible.
- h. Employee training of environmental awareness and company-adopted procedures in regards to it.

Policies and procedures	PART F — Health Safety and Environments	Page:- 56 of 63
Document	25,26,27. Hazardous Substances, Waste Emissions & Use of Natural Resources	Rev No: 00
KG-RJC-001		Date: 20/01/2026

Hazardous Substances

Komal Gems NV is not involved in any hazardous process which requires the use of any hazardous chemicals.

The company is not using any hazardous substances that can pose a threat to human health and/or the environment. Correct labelling for cleaning supplies is present and responsible staff are aware of the correct use of the fore-mentioned with PPE (Personal Protective Equipment) in place. Procedure for correct disposal of cleaning materials is in place. The company shall constantly monitor the usage of materials on its office premises and if any hazardous substances are found, due diligence, preventive and corrective measures shall be initiated.

Waste and Emissions

Komal Gems NV is not involved in any hazardous process which requires the use of any hazardous chemicals nor any boiling activity.

The company ensures the disposal of all office waste will be carried out in accordance regulations and requirements, established by the commercial building management, or through local governmental bodies. The usage of cleaning material shall be stored with proper identification and in safe conditions.

Komal Gems NV has developed Waste Management System by applying the principles of reduce, reuse, recycle and recover to minimize adverse environmental impact wherever possible. Wherever applicable, we reuse materials, recycle materials that cannot be reduced or reused, recover materials and dispose of any residual waste safely.

Environment Management Procedure

Management representative is responsible for coordination of the steps enumerated in this procedure:

- Identifying recycle options;
- Enhancing and strengthening recycling initiatives currently in place;
- Provide the foundation for a waste reduction work plan;
- Encourage workers and supplier and raise awareness to reducing plastic waste by using more reusable materials;
- Evaluate compliance with regulatory requirements;
- Identify emerging issues regarding waste;
- Install special bins that are properly labelled for recyclable and non-recyclable waste. This avoids improper mixing of waste and can reduce handling and disposal costs while making a positive impact on the environment.

Use of Energy and Natural Resources

- Komal Gems NV will ensure the effective use of natural resources like natural light and water wherever applicable, and of electricity, heating and paper consumption in our business operations.
- Resources are used carefully and we are committed to effectively lowering their use when such use is not necessary.

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PART G: DIAMOND Products

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1: Product Disclosure

Policies and procedures	PART G:- Diamond Products	Page:- 58 of 63
Document	28. Product Disclosure	Rev No: 00
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Policy Statement

- a. Komal Gems NV is committed to complying with relevant trading standard legislation and specific national and international regulations, applicable to its products. Komal Gems NV is a natural rough and polished diamond trader and as such, it does not trade with any precious metals or jewellery or other gem materials, other than natural diamonds.
- b. The following essential Policies will be applicable in all transactions of Komal Gems NV, involving diamonds:
 - **Disclosure** - Komal Gems NV shall fully and accurately disclose the material characteristic of their products. All reasonable efforts shall be made to properly disclose all relevant information on the physical characteristics, such as mass/weight, cut, cut, colour, clarity or fineness, of a diamond.
 - **Misrepresentation** - No untruthful, misleading or deceptive statement, representation or material omission in the selling, advertising or distribution of any diamonds shall be made by the company in any medium, including the internet.
 - **Diamond Quality** - The weight, colour, clarity or cut of diamonds will be described in accordance with the recognized guidelines appropriate to the particular jurisdiction.
 - Full disclosure i.e. the complete and total release of all available information about a diamond.
 - The word "diamond" will not be used in the case of names of firms, manufacturers or Trademarks, nor in connection with treated diamonds/diamond simulants or synthetic diamonds. The word "diamond" shall only be used to describe natural diamonds.
 - In accordance with any provenance claims being made, full disclosure of the origin of the diamonds will be made, based on available information from suppliers.
- c. Komal Gems NV has adopted the following definitions:
- d. **Diamond:** A diamond is a natural mineral consisting essentially of pure Carbon crystallized with a cubic structure in the isometric system. Its hardness in the Mohs scale is 10; its specific gravity is approximately 3.52; it has a refractive index of 2.42 and it can be found in many colours.
- e. **Synthetic Diamond:** A synthetic is any object that has been either partially or wholly crystallized or re-crystallized due to artificial human intervention, yet having the same Carbon chemical composition as that of a natural diamond.
- f. **Treated Diamond:** A treated diamond is any object or product that meets the requirements specified in the definition of the words 'diamond' and 'synthetic' above, but has been subject to some form of treatment i.e. any process, enhancement changing, interfering with and/or contaminating the natural appearance or composition of a diamond other than historically accepted practices of cutting and polishing. This includes colour and decolourisation treatment, fracture filling, laser and irradiation treatment and coating.
- g. **Simulants:** A diamond simulant is any object or product used to imitate some or all of the properties, associated with a diamond and includes any material, which does not meet the requirements specified in the definition of the word 'diamond' above.

All additional definitions are in correspondence with the international guidelines.

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Systems and Procedures:

To implement the above policies, the following systems and procedures are followed: Description of rough and polished diamonds is provided either in the invoices or in attached packing lists in adequate detail to satisfy national and/or international guidelines and customer requirements.

- a. Komal Gems NV does not deal with any treated diamonds, synthetic diamonds or diamond stimulants. Komal Gems NV is committed to providing full written disclosure with respect to the natural origin of the diamonds to the purchaser, and the same is written on the invoice.
- b. The company gives a written undertaking on sale of natural diamonds, stating that the product being sold falls under the accepted classification of 'natural diamond'. In the case of enhancing treatments used on the diamonds, with respect to colour alteration or flaw concealment, such needs to be disclosed. The company does not trade with any such treated diamonds. With respect to misrepresentation and misuse of terminology, the specific following guidelines include:
 - The words 'real' and 'genuine' are not used to describe any treated/synthetic diamond or diamond simulant.
 - In the selling, distribution and advertising of diamonds, no misleading statements or representations are made, that do not conform to the requirements as specified in Section 1.6 of the definitions.
 - The words "Brilliant", "Brilliant Cut" and "Full Cut" are only used to describe a round diamond that has at least 32 facets plus the table above the girdle and at least 24 facets below it.
 - Names of firms, manufacturers or trademarks are not used in connection to treated diamonds, unless such names are clearly succeeded by the name 'treated', or are otherwise equally conspicuously and prominently disclosed as 'treated'.
 - Names of firms, manufacturers or trademarks are not used in connection with diamond simulants, unless such names are clearly succeeded by the name of the 'diamond simulant', or the name of the specific mineral.
 - Names of firms, manufacturers, and trademarks are not used as descriptors for synthetic diamonds, unless such names are clearly succeeded by the terms 'synthetic', 'man-made' 'lab-grown' or 'artificial'.
 - The company has identified and complied the applicable local, national and international trading standards and legislations as applicable to its diamond products. The company gets updates on any changes in the accepted legal regulations through its legal consultants.
 - All sales and promotional materials for the company's products are validated by the party in charge of conformance to disclosure requirements. The above systems and procedures have been communicated to the employees through training programs.

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Policy Statement — Synthetic Diamonds

The policy relating to synthetic diamonds is a part of the business principles adopted by Komal Gems NV and is presented below for reference:

- a. The company recognizes that the diamond industry is at a risk of reputational damage due to undisclosed synthetics being sold to end consumers. Towards this end the company is committed to identifying and eliminating the chances of undisclosed diamonds entering its supply chain.
- b. The company is committed to continuously monitor its supply chain for identification of high risk areas and implementing risk control on an ongoing basis.
- c. All relevant employees shall be trained on the requirements and system of pipeline monitoring for undisclosed synthetic detection, using industry-recognized and standard-approved technology for synthetics/simulants detection.
- d. The company shall identify applicable legislation for undisclosed synthetics and initiate appropriate action on detection.

Supply Chain Management: Undisclosed Synthetics

- a. The company has identified processes and pipeline supply points where undisclosed synthetic contamination might occur. The company has carried out a risk assessment of its pipeline supply points.
- b. Komal Gems NV relevant staff members are trained in detection of the forementioned materials and inform immediate management if the occurrence of such takes place.
- c. An appropriate management-approved procedure is therefore drawn for action plan if a discovery of any synthetic/treated diamond or simulants appears.
- d. The forementioned policies and procedures ensure the company's statements for trading with natural diamonds only.

Reporting

- a. Upon detection of treated/synthetic diamonds and/or simulants in purchase goods, the management shall notify and report incidents to relevant organizations, bourses, trade association, law enforcement agencies and suppliers.
- b. Inform RJC team if undisclosed synthetics have been supplied inadvertently to customers with a reasonable explanation of any such incident.

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Policy Statement

The policies relating to this section are part of the business policies adopted by Komal Gems NV, and are presented below for reference:

- a. Komal Gems NV is fully committed to complying with all the requirements specified in the Kimberley Process Certification Scheme and World Diamond Council's (WDC) System of Warranties Declaration.
- b. The definition of 'Conflict Diamonds' as agreed by the Kimberley Process will be adopted i.e. "Rough diamonds used by rebel movements or their allies to finance conflict aimed at undermining legitimate Governments, as described in relevant United Nations Security Council (UNSC) resolutions in so far as they remain in effect, or in other similar UNSC resolutions which may be adopted in the future, and as understood and recognized in United Nations General Assembly (UNGA) Resolution 55/56, or in other similar (UNGA) resolutions which may be adopted in the future."
- c. Wherever applicable, the following affirmative statement, as recommended by the World Diamond Council's System of Warranties, should be printed on all the invoices:
"The diamonds herein invoiced have been purchased from legitimate sources not involved in funding conflict, in compliance with United Nations Resolutions and corresponding national laws. The seller hereby guarantees that these diamonds are conflict free and confirms adherence to the WDC SoW Guidelines."
- d. Entering into transactions involving 'conflict diamonds' or not following the System of Warranties Declaration in invoices, either knowingly or unknowingly, will be considered as a violation of the Business Policies.
Komal Gems NV ensures that concerned personnel within the organization know about government restrictions on the trade in conflict diamonds, the Kimberley Process Certification Scheme and the World Diamond Council System of Warranties.

Komal Gems NV is fully committed to adopting the requirements of the Kimberley Process Certification Scheme (KPCS) and Systems of Warranties (SoW) in all its business transactions, involving purchase and sale of diamonds. As a guarantee, all rough diamonds the company imports/exports outside of the EU come with Kimberley Process Certification Scheme (KPCS) Certificates for origin of non-conflict areas. As of 1st March 2025, all rough diamonds traded within the EU come with origin guarantees on the invoices, according to national and international guidelines. The company guarantees that it does not trade with any goods originating or transported through the Russian Federation or Belarus or any of its subsidiaries as of 24 February 2022 in accordance with the G7 diamond regulations and restrictions. The company guarantees that it does not trade with any diamonds, originating from nationally and/or internationally sanctioned areas/countries due to their violations, in accordance with the U.S. Department of Treasury's Office of Foreign Assets Control ('OFAC') applicable regulations and restrictions.

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Systems and Procedures

- a. The personnel involved in buying / selling and import / export of diamonds have been trained in the following aspects:
- Applicability of Kimberley Process Certificates.
 - Applicability of System of Warranties declaration in invoices.
 - Procedure to be followed for obtaining Kimberley Process Certificate from designated local authority for export.
 - Procedure to be followed in case of import of diamonds as specified by local designated authority.
 - Procedure to be followed for obtaining Kimberley Process Re-Export Certificate from designated local authority.

The independent accountant of Komal Gems NV carries out an audit and reconciliation of the Kimberly Process certificates (in and out).

- b. The Compliance Officer of Komal Gems NV keeps track of amendments to international and local designated authority guidelines relating to KPCS and SoW and communicates such changes to all concerned personnel.
- The Compliance officer also conducts regular internal audits of the compliance to KPCS and SoW after verifying the reconciliation of warranties.

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Grading and Appraisal:

- The management of the company defines diamond grading is a process classifying a diamond's characteristics, in terms of cut, colour, clarity and carat weight.
- Diamond grading is a process of classification of the characteristics of gem materials, including diamonds, which can be carried out in independent laboratories or in-house by trained personnel.
- A Diamond Grading Report is a report on the grading of a diamond's physical characteristics, usually in terms of cut, colour, clarity and carat weight. If an opinion on monetary value is included in a Diamond Grading Report, it is also considered to be an Appraisal Report.
- Appraising is generating an opinion of monetary value based on the composition, and qualities of a gem material.

Management Commitment:

Grading reports play an important role in the industry and can assist consumers in making purchasing decisions and in protecting and insuring their property. Information provided in such diamond grading reports must therefore be transparent and not used in a manner that could be deceptive. Based on that, the only reports that Komal Gems NV approves are authentic diamond reports from nationally and internationally renowned gem testing laboratories, predominantly GIA (Gemmological Institute of America), occasionally IGI (International Gemmological Institute) and HRD (Hoge Raad Voor Diamant or Diamond High Council).

The company does not offer any appraisal services, nor diamond grading for the purposes of any external public services. The trained staff in the company perform diamond grading and inspection with specialised equipment solely for the operations and purposes of the business as it being a diamond trader.