

# SUPPLIER DOCUMENTATION

## **Responsible Jewellery Council (RJC) Policy**

**We** deal in natural diamond sales and purchase.

**Komal Gems NV** is a Member of the Responsible Jewellery Council (RJC) and Compliant with RJC COP 2024.

As an RJC Member we commit to operating our business in accordance with the RJC Code of Practices which is available at [www.responsiblejewellery.com](http://www.responsiblejewellery.com). We commit to integrating ethical, human rights, social and environmental considerations into our day-to-day operations, business planning activities and decision-making processes.

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

**Komal Gems NV** shall establish and implement the Specific Policies related to:


- Bribery and Facilitation Payments prevention
- Product Security
- Money Laundering and Finance of terrorism prevention
- Kimberley Process
- Product Integrity, Disclosure
- Child Labour prevention
- Forced Labour prevention
- Freedom of Association and Collective bargaining
- Discrimination prevention and Discipline and Grievance Procedures
- General Employment, Working hours, Remuneration
- Health and Safety
- Environmental protection, Hazardous substances, Waste and Emissions, Use of energy and natural resources
- Human Rights
- Community Engagement and Development
- Use of Security Personnel
- Supply Chain
- Statement of Commitment to RJC Policies and Procedures

**Komal Gems NV** RJC Policy is available for public viewing.

Any Grievances or Suggestions can be submitted either electronically at [info@komalgems.eu](mailto:info@komalgems.eu) or via office phone +3232264281, or in person in our office at Hovenierstaar 2, Office 619, Box 347, 2018 Antwerpen, Belgium.

For Komal Gems NV:

Girdharbhai Gajera (Director)

  
KOMAL GEMS N.V.  
Hovenierstaar 2  
2018 Antwerpen

# DIAMONDS - DUE DILIGENCE SUPPLIER FORM:

<b>SUPPLIER INFORMATION</b>		
<b>COMPANY INFORMATION</b>		
Date		
Name of Company		
Address		
Company Type	Mid term Tier-1 Company (with own Mfg. Facility) <input type="checkbox"/> Mid termTier-2 Company (with own Mfg. Facility) <input type="checkbox"/> Down Stream Companies <input type="checkbox"/>	
RJC COP Certified / BPP Compliant Company	Yes <input type="checkbox"/> No <input type="checkbox"/>	
COP Expiry Date/ Last BPP Audit done as on:		
Compliance Officer /Responsible Person		
<b>Human Rights</b>	<b>Y/NO/NA.</b>	<b>COMMENTS</b>
1) Do you have a written policy commitment on Human Rights? If so, is this policy consistent with the UN Guiding Principles on Business and Human Rights?		Yes <input type="checkbox"/> No <input type="checkbox"/>
2) Do you have a procedure that assess and mitigate all potential human rights impacts associated with your activities?		Yes <input type="checkbox"/> No <input type="checkbox"/>
3) Do you have a policy and procedures against child labour, forced labour and human trafficking?		Yes <input type="checkbox"/> NO <input type="checkbox"/>
<b>Policies and Due Diligence Management System</b>	<b>Y/NO/NA.</b>	<b>COMMENTS</b>
4) Do you have a supply chain policy consistent with Annex II of the OECD (Organization for Economic Co-operation and Development) Guidance?		Yes <input type="checkbox"/> NO <input type="checkbox"/>
5) Do you have a due diligence management system in place that is consistent with the OECD Guidance?		Yes <input type="checkbox"/> NO <input type="checkbox"/>
6) Has your due diligence management system been audited by an independent third-party? Please specify the date of the last audit and the name of the third-party independent organisation		Yes <input type="checkbox"/> NO <input type="checkbox"/>
<b>Product source and origin</b>	<b>Y/NO/NA.</b>	<b>COMMENTS</b>
7) Can you explain from where your products are sourced? (this information can be provided in aggregate form e.g. a list of all countries, areas and/or companies where you have sourced from)		
8) List the percentage of product you supply to us that falls into the following categories:		1. Mined rough/polished stones with known origin (mine, company or geographical location where the mine is located)-----%

		<p>2. Mined rough/polished stones where there is no information available on origin-----%</p> <p>3. Recycled stones-----%</p> <p>4. Grandfathered stones-----%</p>
<p>9) What percentage of your supplies are traceable to origin.</p> <p>Please specify % to Mine/Country/Region</p>		
<p>10) Does your company source diamonds from Large Scale Mining or Artisanal and Small Scale Mining (ASM)? If Yes, in what %?</p>		<p>Yes <input type="checkbox"/> NO <input type="checkbox"/></p>
<p>11) If sourcing from any ASM sources, is that done with consideration of the risks and in a manner respecting Human Rights and not contributing to any form of conflict or illegal/dangerous activity?</p>		<p>Yes <input type="checkbox"/> NO <input type="checkbox"/></p>
<p>12) Does supplier engage in CVD's or simulants?</p> <p>(It is the policy of Company to only deal in natural diamonds, no CVD's.)</p>		<p>Yes <input type="checkbox"/></p> <p>No <input type="checkbox"/></p>
<p>13) Does your supplier provide information / documents regarding origin of the product.</p>		
<p>14) Have you established a conflict minerals sourcing policy. (IN accordance to Annexure-II of OECD)</p>		<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>If Yes, Please attach policy with this document</p>
<p>15) Is your conflict Minerals sourcing policy publicly available on your website</p>		
<p>16) Do you require your direct suppliers to be conflict-free Diamonds?</p>		
<p>17) Does your company conduct conflict free minerals survey of your relevant supplier?</p>		
<p>18) Do you review due diligence information received from your supplier against your companies expectations?</p>		
<p>19) Have you implemented due diligence measures for conflict free sourcing</p>		
<p>20) Do you verify your due diligence of supply chain(in accordance to OECDE)</p>		
<p><b>Supplier Risk Assessment</b></p>		
<p><b>PRODUCT INFORMATION</b></p>	<p><b>Y/NO/NA.</b></p>	<p><b>COMMENTS</b></p>
<p>21) Have you had your due diligence practices independently audited? ( W.r.t. sourcing of conflict free minerals)</p>		<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>Note: If yes, please attach a copy of the audit report with this form.</p>

22) Have you carried out a risk assessment on the product origin/ source (and its transport) based on an approach that is aligned with the OECD Guidance?		Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, please attach details/evidence with this document (e.g. a copy of your risk assessment report)
23) If yes, did you identify any 'red flags' a part of that risk assessment		Yes <input type="checkbox"/> No <input type="checkbox"/>
<b>24) For Red Flags Only</b>	<b>Y/NO/NA.</b>	<b>COMMENTS</b>
A) What type of red flag as have you identified?  (tick all that apply)		Red-flag location <input type="checkbox"/> Red-flags Supplier <input type="checkbox"/> Red-flags <input type="checkbox"/> Circumstances
<p>B) Provide a description/summary of the red flags identified</p> <p>for example, you have determined based on your risk assessment that the source or origin of the material is a "Conflict Affected High Risk Area")</p>		
C) During your risk assessment, did you identify the presence of any of the following adverse impacts in the red-flag supply chain? (tick all that apply)	<input type="checkbox"/> Serious abuses associated with the extraction, transport or trade of minerals (requires immediate disengagement) <input type="checkbox"/> Direct or indirect support to non-state armed groups (requires immediate disengagement) <sup>2</sup> <input type="checkbox"/> Direct or indirect support to public or private security forces who illegally control, tax or extort money from mine sites, transportation routes and upstream actors <input type="checkbox"/> Bribery and fraudulent misrepresentation of the origin of minerals <input type="checkbox"/> Money laundering and non-payment of taxes and royalties due to governments <input type="checkbox"/> Note: See Annex II of the OECD Guidance for further information on relevant adverse impacts	
25) Have you implemented a risk management plan to prevent or mitigate potential or actual adverse impacts?		Yes <input type="checkbox"/> No <input type="checkbox"/>
26) If yes, provide a description/summary of your risk management plan.		
27) Does your review process include corrective action management		Yes <input type="checkbox"/> NO <input type="checkbox"/>
28) If yes, provide a description/summary of your risk management plan		

29) Have you established, or are you participating in, a traceability system that collects and maintains segregated information for all material inputs and outputs from red flagged supply chains (from extraction through to export)		Please specify the program name.
30) Do you carry out KYC Checks to identify all suppliers and relevant service providers (e.g. transportation companies) from the point of origin through to export?		Yes <input type="checkbox"/> NO <input type="checkbox"/>
31) Have you had your due diligence practices independently audited? If yes, by whom?		Yes <input type="checkbox"/> NO <input type="checkbox"/>
<b>Supplier Name :</b>  <b>Filed By:</b>  <b>Signature</b>  <b>Date</b>	<b>For Company: Komal Gems NV</b>  <b>Reviewed By:</b>  <b>Signature</b>  <b>Date</b>	

# Supplier Commitment

As a diamond supplier to, we hereby confirm that we have a supply chain policy that is consistent with RJC COP Annex II and/or OECD Guidance (Organization for Economic Co-operation and Development) and a commitment to identify and assess risks related to conflict affected and high-risk areas (CAHRAs).

The RJC COP Annex II and/or OECD Guidance encompasses the following provisions:

1.
  - a. Respect human rights according to the Universal Declaration of Human Rights and International Labour Organization Declaration on Fundamental Principles and Rights at Work;
  - b. Do not engage in or tolerate bribery, corruption, money laundering or finance of terrorism;
  - c. Support transparency of government payments and rights-compatible security forces in the extractives industry;
  - d. Do not provide direct or indirect support to illegal armed groups;
  - e. Enable stakeholders to voice concerns about the jewelry supply chain; and
  - f. Are implementing the OECD five-step framework as a management process for risk-based due diligence for responsible supply chains of minerals from conflict-affected and high-risk areas.
2. We also commit to using our influence to prevent abuses by others.
3. Regarding serious abuses associated with the extraction, transport or trade of minerals: 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 labor;
  - c) The worst forms of child labor;
  - d) Human rights violations and abuses; or
  - e) War crimes, violations of international humanitarian law, crimes against humanity or genocide.
4. We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are committing abuses, or linked to, any party committing these abuses.
5. Regarding direct or indirect support to non-state armed groups: We only buy or sell 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.
6. All diamond invoices are to be compliant with the World Diamond Council System of Warranties (SoW), consider stating “The diamonds herein invoiced have been {sourced} purchased from legitimate sources not involved in the funding of conflict, in compliance with United Nations Resolutions and corresponding national laws {where the invoice is generated}. The seller hereby guarantees that these diamonds are conflict free and confirms adherence to the WDC SoW Guidelines.”
  - a. Where national law prevents the SoW statement from being included in your invoice, you should include it in separate accompanying documents.

7. All invoices shall contain the following statement:

“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.”

“The diamonds herein invoiced are exclusively of natural origin and untreated based on personal knowledge and/or written guarantees provided by the supplier of these diamonds.”

8. We hereby guarantee our diamonds have not originated from the Mbada and Marange regions of Zimbabwe.

9. We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are sourcing from, or are linked to, any party providing direct or indirect support to non-state armed groups.

10. Regarding public or private security forces:

We affirm that the role of public or private security forces is to provide security to workers, facilities, equipment and property in accordance with the rule of law, including law that guarantees human rights. We will not provide direct or indirect support to public or private security forces that commit abuses.

11. Regarding bribery and fraudulent misrepresentation of the origin of minerals:

We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of minerals, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of minerals.

12. Regarding money laundering:

We will support and contribute to efforts to eliminate money laundering where we identify a reasonable risk resulting from, or connected to, the extraction, trade, handling, transport or export of minerals.

13. Diamonds sold, if manufactured by us, can be traced to the original rough sources, including Kimberley certificate, from the rough through the polished and certification process.

Company:

Name:

Signed:

Title:

Date: