

SUPPLY CHAIN POLICY

GEMASIA BV is a trading company in the diamond industry. This policy confirms GEMASIA BV's commitment to respect human rights, avoid contributing to the finance of conflict and comply with all relevant UN sanctions, resolutions and laws.

- 1) GEMASIA BV is a certified member of the Responsible Jewellery Council (RJC). As such, we commit to proving, through independent third-party verification, that we:
 - a. respect human rights according to the Universal Declaration of Human Rights and International Labour Organization Fundamental Rights at Work;
 - b. do not engage in or tolerate bribery, corruption, money laundering or finance of terrorism;
 - c. support transparency of government payments and rights-compatible security forces in the extractives industry;
 - d. do not provide direct or indirect support to illegal armed groups; and
 - e. enable stakeholders to voice concerns about the jewellery supply chain.
 - f. are implementing the OECD 5-Step framework as a management process for risk based due diligence, fully compliant with the ANNEX II of the OECD guidelines, for responsible supply chains of minerals from conflict-affected and high-risk areas (CAHRA's)¹. The addendum to this policy specifies how we define CAHRAs in our business context.
- 2) We also commit to using our influence to prevent abuses by others. We will work across our whole supply chain to promote the standards set out in this policy. We seek long-term partnerships with our main suppliers and commit to working with them to understand and uphold this policy. We will also promote our suppliers to work towards the same standards with their suppliers. GEMASIA BV has a grievance mechanism by which any interested party can raise concerns about sourcing diamonds from conflict affected and high-risk areas (CAHRA's).
- 3) **Regarding serious abuses associated with the extraction, 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. the worst forms of child labour;
 - d. human rights violations and abuses; or
 - e. war crimes, violations of international humanitarian law, crimes against humanity or genocide.
- 4) We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are committing abuses described in 4 or are sourcing from, or linked to, any party committing these abuses.

5) 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.

6) We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are sourcing from, or are linked to, any party providing direct or indirect support to non-state armed groups as described in paragraph 6.

7) Regarding public or private security forces

We affirm that the role of public or private security forces is to provide security to workers, facilities, equipment and property in accordance with the rule of law, including law that guarantees human rights. We will not provide direct or indirect support to public or private security forces that commit abuses described in paragraph 4 or that act illegally as described in paragraph 6.

8) Regarding bribery and fraudulent misrepresentation of the origin of diamonds

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

9) Regarding money laundering

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

Addenda: Supply Chain Procedures & Grievance Mechanism

Antwerp, November 10th, 2021



Mr. Shah Himanshu
Director GEMASIA BV



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(1) <https://www.oecd.org/daf/inv/mne/OECD-Due-Diligence-Guidance-Minerals-Edition3.pdf>.

SUPPLY CHAIN POLICY – GRIEVANCE MECHANISM

Grievance process for concerns relating to the diamond supply chain of GEMASIA BV.

GEMASIA BV has established this grievance procedure to hear concerns about circumstances in the supply chain involving diamonds from conflict-affected and high-risk areas.

Mr. SHAH Himanshu is responsible for implementing and reviewing this procedure.

Concerns can be raised by interested parties via email or telephone to:

Mr. SHAH Himanshu - Director

Telephone: [+32] 3 232 75 80

email: info@gemasiagroup.com

On receiving a complaint, we will aim to:

- Get an accurate report of the complaint.
- Explain our complaint procedure.
- Find out how the complainant would like it addressed/ resolved.
- Assess the eligibility of the complaint and, where applicable, decide who should handle it internally. In cases where we are unable to address the complaint internally (e.g. where our company is too far removed from the origin of the issue raised in the complaint) , we may redirect it to a more appropriate entity or institution, such as the relevant supplier or industry body.
- Where the issue can be handled internally, seek further information where possible and appropriate.
- Identify any actions we should take including hearing from all parties concerned, and monitoring the situation.
- Advise the complainant of our decisions or outcomes.
- Keep records on complaints received and the internal process followed, for at least five years.