

GEM INDIA EXPORTS

4780, KGB KA RASTA, MUTH KA KUA, JOHARI BAZAR, JAIPUR

ANTI-MONEY LAUNDERING POLICY

This Policy represents the basic standards of Anti-Money Laundering policy of, **Gem India Exports, Jaipur**. This policy is in effective and copies of this Policy will be distributed to all suppliers and all relevant employees must be thoroughly familiar with and make use of the material contained in this Policy.

Definitions & Procedures

Money Laundering

Money laundering is a generic term used to describe any process that conceals the origin or derivation of the proceeds of crime so that the proceeds appear to be derived from a legitimate source.

Money laundering is sometimes wrongly regarded as an activity that is associated only with organized crime and drug trafficking. It is not. It occurs whenever any person deals with another person's direct or indirect benefit from crime.

Money laundering is a crime that is most often associated with banking and money remittance services. Whilst banks are often an essential part of successful laundering schemes, the financial and related services that Licensees offer are also vulnerable to abuse by money launderers.

Additional Due Diligence measures for financial institutions

We are undertaking following additional due diligence measures while establishing and maintaining correspondent relationships:

- ❖ Obtaining sufficient information about a respondent company to avoid any relationships with "shell-banks";
- ❖ Determining from publicly available sources of information the reputation of a respondent company including whether it has been subject to a money laundering or terrorist financing investigation or other regulatory action;
- ❖ Assessing the respondent institution's anti-money laundering and terrorist financing controls on a periodic basis.

Goals and objectives

The main purpose of the Policy is to establish the essential standards designed to prevent the money laundering activities. Other objectives pursued by this Policy are as follows:

- ❖ We are Promoting a "Know Your Customer" policy as a cornerstone principle for the business ethics and practices;
- ❖ Conducting self-assessments of compliance with AML policy and procedures.

Adherence to this policy is absolutely fundamental for ensuring fully comply with applicable antimoney laundering legislation.

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The company will not have any relationship with any shell banks.

The company is committed to examining its anti-money laundering strategies, goals and objectives on an ongoing basis and maintaining an effective AML Policy.

Monitoring and reporting of suspicious transactions/activity

All personnel must be diligent in monitoring for any unusual and potentially suspicious transactions/activity basing on the relevant criteria applicable in the national or international jurisdiction.

The reporting of suspicious transactions/activity must comply with the international laws/regulations

Record keeping

Records shall be kept of all documents obtained for the purpose of identification and all transaction data as well as other information related to money laundering matters in accordance with the applicable anti-money laundering laws/regulations of the country;

All records must be kept for at least 6 years;

Training

Training on anti-money laundering will be provided to those new employees who work directly with customers and to those employees who work in other areas that may be exposed to money laundering and terrorist financing threats which includes;

Identification and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering and internal policies to prevent money laundering against targeted foreign countries and shall cooperate fully with government agencies, self-regulatory organizations and law enforcement officials.

Grievance Mechanism: -

Gem India Exports has established this grievance procedure to hear concerns about circumstances in the supply chain involving diamonds/coloured gemstones from conflict-affected and high-risk areas.

Mr. Sudhir Kothari is responsible for implementing and reviewing this procedure.

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

Mr. Sudhir Kothari (Mobile No.9829052824)

Email: - gemindia@hotmail.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

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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.

This policy is endorsed by Partner of this company.

Date : 18/10/2024

For GEM INDIA EXPORTS



Partner

Sudhir Kothari

GEM INDIA EXPORTS

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HUMAN RIGHTS POLICY

Gem India Exports has a policy to reserve & support the rights of their workers as a human being, to maintain this motto we have several policies for good implementation & following policies are good examples of that.

1. We protect the discrimination in our organization, we have separate policy for this.
2. We are not taking forced labor in our organization; people can move from our organization on their choice. We are not supporting human trafficking in any form & if found any matter in this concern, immediately police shall be informed.
3. We respect the women & their requirement for privacy, so we provide separate toilets for their convenience & privacy.
4. We are not suggesting our female worker for pregnancy test during or before hiring.
5. We support the right of freedom of association & workers choose their own representative through democratic manner & formed Works Committee, this committee represent worker's problems & suggestions before management.
6. We are providing potable water to all worker free of cost for their good health.
7. We provide dining area for taking lunch in a good manner.
8. Cleanliness of workplace maintain regularly, the preserve their right of work in a good workplace.
9. We provide free of cost PPE to all concern worker during work to protect accident.
10. We have policy to provide equal remuneration for equal working
11. Health & safety committee working to resolve worker's health & safety issues in organization.
12. Worker can easily move to assemble at assembly area in case of any emergency.
13. Workers can freely move within factory without any restriction.
14. Workers can refuse or accept overtime working on their choice, only voluntary overtime allowed, no forced overtime.
15. We are not taking bond, original documents from any employee to reserve their right to choose any job anywhere.

We expect from our suppliers, customers & all stakeholders that they should follow above requirements.

Gem India Exports has established a grievance procedure to hear concerns about human right violation or any other unethical trade practice within company or supply chain.

The compliance officer Mr. Rishabh Kothari shall be responsible for implementing and reviewing this procedure. Human Right violation related concerns can be raised by interested parties via email to:

This policy is endorsed by Partner of this company.

Date : 18/10/2024

For GEM INDIA EXPORTS



Partner

Sudhir Kothari

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RJC COMPLIANCE POLICY

The Responsible Jewellery Council (RJC) is a not-for-profit organization with the following mission:

"To advance responsible ethical, social and environmental practices, which respect human rights, throughout the Gemstone supply chain, from mine to retail"

RJC's "Code of Practices" defines responsible ethical, human rights, social, and environmental practices, applicable to all RJC members.

Gem India Exprts become a member of RJC and is fully committed to the Code of Practices.

Gem India Exprts is a precious & semi-precious gems stone manufacturing company which is situated 4780, KGB KA RASTA, MATH KA KUA, JOHARI BAZAR, JAIPUR has employed around 100 personnel.

So, we commit to operating our business in accordance with the RJC COP 2019 Code of Practices. We commit to integrating ethical, human rights, social and environmental considerations into our day-to-day operations, business planning activities and decision-making processes in setting high standards with respect to business, social and environmental responsibilities.

We strongly encourage all our business partners to follow and implement the various requirements of the RJC COP 2019 system.

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Date : 18/10/2024

For GEM INDIA EXPORTS



Partner

Sudhir Kothari

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Supply Chain Policy

Gem India Exports confirm this policy commitment to respect human rights, avoid contributing to the finance of conflict and comply with all relevant UN sanctions, resolutions and laws.

is a certified member of the Responsible Jewellery Council (RJC), As such we commit to proving, through independent third-party verification: -

- a) Respect human rights according to the Universal Declaration of Human Rights and International Labour Organization
- b) Declaration on Fundamental Principles and Rights at Work;
- c) Do not engage in or tolerate bribery, corruption, money laundering or finance of terrorism;
- d) Support transparency of government payments and rights-compatible security forces in the extractives industry;
- e) Do not provide direct or indirect support to illegal armed groups;
- f) Enable stakeholders to voice concerns about the jewellery supply chain; and
- g) are implementing the OECD five-step framework as a management process (and Supplement on Gold if applicable) for risk-based due diligence for responsible supply chains of minerals from conflict-affected and high-risk areas.
- h) We also commit to using our influence to prevent abuses by others

Regarding serious abuses associated with the extraction, transport or trade of gold:

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.

We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are committing abuses described in paragraph 4 or are sourcing from, or linked to, any party committing these abuses.

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

We will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring gold 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 gold is traded and upstream actors in the supply chain; or b. tax or extort money, or gold at mine sites, along transportation routes or at points where gold is traded, or from intermediaries, export companies or international traders.

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- b) 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.
- c) **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.
- d) **Regarding bribery and fraudulent misrepresentation of the origin of gold:**
We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of gold, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of gold.
- e) **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 gold.

Gem India Exports has established a grievance procedure to hear concerns about human right violation or any other unethical trade practice within company or supply chain.

The compliance officer Mr. Rishabh Kothari shall be responsible for implementing and reviewing this procedure.

Supply Chain policy violation related concerns can be raised by interested parties via email to:

This policy is endorsed by Partner of this company.

Effective Date: - 18/10/2024

For GEM INDIA EXPORTS



Partner

Sudhir Kothari