



ETHICAL COMPLIANCE POLICY

Section A: General Information about the Company:

We're a 10-year-old brand led by three young, enterprising men with decades of collective experience between us. We have an excellently equipped factory with knowledgeable and meticulous people running it. We've serviced hundreds of customers over the years and the fact that they are still with us proves the level of service.

We've been called helpful, innovative and enterprising. We've been thanked by various clients for beating deadlines and exceeding quality standards. What matters most to us is that we've been called for repeat orders.

For More Details refer to website : <http://adityafindings.com/>

Section B: Ethical Compliance of Aditya Findings Pvt. Ltd.:

1.1 Legislation and Regulations

- a. ADITYA FINDINGS PVT. LTD. shall operate in compliance with relevant national and international legislations / regulations as applicable in the countries in which they operate.
- b. All employees are expected and directed to comply with all applicable laws and regulations as well as will have to follow the rules and regulation formed by ADITYA FINDINGS PVT. LTD. regarding its business policies
- c. Compliance team maintains the list of applicable legal and regulatory requirements and same is followed for compliance on day-to-day basis. Necessary records of requirements and its compliance is maintained.

1.2 Money Laundering, Terrorism Financing, Other Financial Offences

- a. ADITYA FINDINGS PVT. LTD. recognizes the fact that entities in the gems and jewellery 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, facilitation payments, corruption, smuggling, embezzlement, fraud, racketeering, transfer pricing and tax evasion.
- c. ADITYA FINDINGS PVT. LTD. shall act in accordance with national laws with respect to auditing of its financial accounts and maintaining internal controls as guided by various regulations. Following acts and international guidelines is considered while establishing policies of



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the ADITYA FINDINGS PVT. LTD..

- Prevention of Money laundering Act 2002
 - FATF 40 Recommendations and 8 special recommendations
- d. It is the responsibility of concerned personnel to know and understand the relevant 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 may also be considered as a violation of the Business Principles, depending on the seriousness of the non-conformance.
- e. Compliance officer ensure all the critical steps such as KYC (know your counter party) Identification of suspicious transaction, reporting to management and record keeping as required by the local act and legislations are complied with.
- f. Compliance officer carries out periodic review of AML/CFT compliances and submits his report to management on Quarterly basis.

1.3 Anti-Bribery and Facilitation Payment Policy:

- a. The ADITYA FINDINGS PVT. LTD. shall ensure complete prohibition of Bribery and facilitation payment across organization and in all the entities.
- b. ADITYA FINDINGS PVT. LTD. will not offer, accept or countenance any payment, gift in kind, hospitality, expense or promises as such that may compromise promises of fair competition.
- c. Entity shall prohibit bribery and facilitation payment and shall comply with various rules and regulations of the land.

1.4 Disclosure Practices

Aditya Findings Pvt. Ltd. provides accurate information regarding product purity, specifications, quality standards, and material composition. The Company ensures that customers receive clear and reliable product details to support informed purchasing decisions and maintain trust in its products and services.

1.5 Precious Metal Sourcing Policy:

Aditya Findings Pvt. Ltd. is committed to the responsible sourcing of precious metals and to conducting business in a manner that respects human rights and ethical business practices.



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The Company seeks to procure precious metals from reputable and responsible suppliers and strives to ensure that materials are not sourced from Conflict-Affected and High-Risk Areas (CAHRAs) that may contribute to conflict, illegal activities, or human rights abuses.

The Company expects its suppliers to comply with applicable laws, regulations, and responsible sourcing standards. Where reasonably practicable, Aditya Findings Pvt. Ltd. seeks information regarding the origin of precious metals and promotes transparency throughout its supply chain.

Through these efforts, the Company aims to support responsible sourcing practices and maintain the integrity of its products and operations.

CAHRA's are.

Aditya Findings Pvt. Ltd. ensures that none of its supplies come from the aforesaid countries/regions. Aditya Findings Pvt. Ltd. shall communicate its sourcing policy to all its stakeholders and will ensure effective implementation of its policy amongst all its entities.

Aditya Findings Pvt. Ltd. shall ensure that none of its supplies come from CAHRA Region sources. For More Details of CAHRA's refer to list of country under the regulation of EU 2017 <https://www.cahraslist.net/cahras>.

1.6 Supply Chain Management / Best Endeavours

The management of ADITYA FINDINGS PVT. LTD. is committed to take appropriate action to use best endeavours to ensure that the suppliers and contractors are committed for compliance to International Social Standards.

Annual communications are exchanged with all the supply chain to spread awareness.

1.7 Employment

- a. Compliance is required at all times, with applicable national and, where appropriate, international laws / regulations with respect to employment and labour.
- b. The ADITYA FINDINGS PVT. LTD. shall not require Staff to work for more than the national limit of hours in a week on a regular basis.
- c. The ADITYA FINDINGS PVT. LTD. 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 Staff and provide some discretionary income.



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1.8 Health and Safety

- a. ADITYA FINDINGS PVT. LTD. recognizes the need to develop a sustainable, value creating business and is committed to the following:
- 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. This review will use appropriate standards as required by prevailing laws, expert opinion and our knowledge of best practices.
- d. All workplaces will be constructed to meet safety standards with local regulations as the minimum standards that will be applicable

1.9 Non Discrimination, Disciplinary Practices

- a. Discrimination can mean distinction, exclusion or preference.
- b. Any form of discrimination relating to the hiring, discharge, pay, promotion and training of employees on the basis of race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, HIV status, Migrant status, membership of worker representative bodies, political affiliations, or any criteria that are unlawful is strongly discouraged by the ADITYA FINDINGS PVT. LTD. and any such reported incidents will be viewed as a serious violation of this Business Principles.
- c. We will ensure that employees who have certain life-threatening diseases or illnesses are not treated differently from other employees, and will continue to employ such personnel, as long as they are physically and mentally fit to attend to their normal job responsibilities.
- d. We shall at no time condone the use of corporal punishment or other forms of mental or physical coercion.
- e. We encourage all personnel to voice concerns promptly, if they have a genuine reason to believe that a policy, ADITYA FINDINGS PVT. LTD. operation or practice is or will likely be in violation of any law, regulation or internal ADITYA FINDINGS PVT. LTD. rule or policy, including this Business Principles. ADITYA FINDINGS PVT. LTD. assures all employees who come forward in good faith to report issues, that they will be treated fairly and respectfully.



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1.10 Child Labour

- a. No form of child labour should be employed at any of the facilities of the ADITYA FINDINGS PVT. LTD. Unless local laws stipulate a higher age, the minimum age for employment that will be applicable is fifteen (As per ILO Convention No. 138).
- b. For authorized adolescents (persons below 18 years of age but above 15 years), the ADITYA FINDINGS PVT. LTD. management is responsible for providing working conditions, hours of work and wages in compliance with applicable local laws as a minimum.
- c. As per our ADITYA FINDINGS PVT. LTD. policy no child labour or adolescent child labour will be employed.
- d. ADITYA FINDINGS PVT. LTD. will implement suitable policy and procedures to verify the age proof all new employees joining the organization.

1.11 Forced Labour

- a. The management of ADITYA FINDINGS PVT. LTD. is fully committed to ensuring that forced or involuntary labour is not practiced in any form at any of its facilities. Any reported incidents relating to forced labour will be considered as a serious violation of this Business Principles.
- 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''

1.12 Human Rights

- a. All employees in the ADITYA FINDINGS PVT. LTD.' facilities will be treated with equality, respect and dignity.
- b. ADITYA FINDINGS PVT. LTD. 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
- c. The ADITYA FINDINGS PVT. LTD. strongly discourages any form of sexually coercive, threatening, abusive or exploitative behavior.
- d. Any reported incidents relating to direct or indirect physical, sexual, racial, religious,



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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 ADITYA FINDINGS PVT. LTD.

- e. HSE & Anti sexual harassment committees are formed and committee shall review the compliance at regular intervals by holding review meetings.

1.13 Environment Protection

ADITYA FINDINGS PVT. LTD. is committed to effective environmental management as one of its important corporate priorities, and will focus on the following initiatives:

- a. Compliance with all applicable environmental laws and regulations
- b. The impact of each of our operations on the environment will be systematically assessed for compliance with appropriately defined standards and reviewed periodically to mitigate or eliminate such impact.
- c. Disposal procedures for waste generated will be clearly defined and practiced in line with standards that are set by law and best practices of the industry.
- d. Improvement of employee environmental awareness and performance through detailed policies and procedures, training, and recognition of excellence.
- e. Environmental Management Systems: Organization maintains environmental controls and procedures to manage resource use, emissions, and waste in line with applicable legal and RJC COP 2024 requirements.
- f. Legal Compliance: As an organization, there are currently no specific environmental legal compliance requirements applicable to our operations, except for provisions under pollution control regulations, where applicable. As part of our commitment to good governance and sustainable practices, we maintain records of electricity consumption. These records are reviewed periodically to monitor energy usage and identify opportunities for efficient energy utilization and conservation.
- g. Water Stewardship: As an organization, there are currently no specific environmental legal compliance requirements applicable to our operations, except for provisions under pollution control regulations for water privation, where applicable. As part of our commitment to good governance and sustainable practices, we maintain records of water consumptions.
- h. Climate & Energy Management – GHG Measurement: Greenhouse gas (GHG) emissions from Scope 1 & Scope 2 are calculated and monitored periodically in line with recognized methodologies. The company carbon footprint as of 31st March 2026 has been calculated.



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Management is currently reviewing the baseline study and sustainability and ESG report available on request.

- i. Climate Action & Continuous Improvement: Emission reduction targets and energy-efficiency initiatives are identified based on GHG assessments to support continuous improvement over time.

1.14 Product Security

ADITYA FINDINGS PVT. LTD. is committed to provide safety of product throughout its supply chain by following precaution as mentioned below

- Each and every stage of product processing it is covered through blanket insurance
- Suitable safe guarding and storage is ensured at all stage with the help of safes
- We are taking at most care to ensure safety of visitors, Customers and interested parties, suitable arrangements such as CCTV, Multi-level entry doors and other electronic intelligence.
- All the concern persons are trained on relevant safety and security procedures to be followed at all time.

1.15 WHISTLEBLOWER PROTECTION – SCOPE & COVERAGE

- a. This Whistle blower Protection mechanism is established to enable employees, contract workers, suppliers, and other relevant stakeholders to safely raise concerns related to actual or suspected misconduct or non-compliance. The scope of reportable concerns includes, but is not limited to, breaches of OECD Due Diligence Guidance for Responsible Supply Chains of Minerals, AML/CFT laws and regulations, and disclosure requirements, as well as social, labour, and human rights standards, and health, safety, and environmental (HSE) obligations. This mechanism supports ethical conduct, transparency, and responsible business practices across the precious metals, and jewellery supply chain, and is designed to align with applicable legal, regulatory, and industry-specific expectations.
- b. Any grievance or whistleblowing can be done using multiple ways such as phone call to compliance officer, email, meeting in personal and using other communication techniques, contact details of compliance officers are published.

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1.16 Supply Chain Grievances and Whistleblowing Policy

- a. Aditya Findings Pvt. Ltd. Grievance Procedures have been established and available for all employees to raise any issue/grievance for work culture, discipline, practices and supply chain concerns.
- b. If any Grievance from a customer and/or supply chain partner has been reported, relating to any actual, alleged or suspected breach of this Policy, this matter should be raised in accordance with Supply Chain Grievance Policy.
- c. The Relevant Worker responsible for the relationship with the Supplier must communicate to the Supplier about the receipt of the complaint and issue a summary report on the conclusion of the investigation.
- d. It is required that the Supplier's staff have been informed of our supply chain grievance policy and it is available to them as well and can be used by them as a way of raising any concerns.
- e. With respect to breaches, by any party in the Supply Chain Policy Commitments and/or in the Supplier Code of Conduct, the breach will be reported to senior management and based on an investigation report, necessary actions shall if needed be taken.
- f. The Top Management and Marketing team to deal with Grievances, concerns and complaints submitted by the employees, clients, customers, and other affected end user and stakeholders.
- g. A written objection to the business operation resolution issued concerning the employees, clients, customers, and other affected end-user and stakeholders. Which is submitted by him/her to remove the injustice or wrongdoing he/she claims to have been witnessed or inflicted.

The Objectives of the Grievances:

1. Ensures that materials acquired and services provided are obtained with adherence to human rights, labor, environmental and highest business ethics.
2. Ensures to achieve justice, employment satisfaction and the stability of the legal status of the employees.
3. Ensures that business activities meet the international market ethics and standard.
4. Ensures that business operates in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and its Supplement on Gold, DMCC Rules for Risk Based Due Diligence in the Gold and Precious



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Metals Supply Chain and Responsible Jewellery Council.

5. Maintain the business status in providing the highest standard in operating in the gold and silver industry.

Grounds for the Grievance and Procedure for submission:

1. Human rights violations; force and child labor, torture, serious abuses, etc.
2. Contravention of the law, regulations or by-laws
3. Accounts and financial Manipulation
4. Fraud, bribery, corruption and solicitation
5. Falsification of documents
6. Tolerates law and regulation violators and supporter of non-state armed group and all forms of criminal activities.
7. Employee misconduct and labor practices.
8. Health and safety; working conditions.

We encourage all to submit reports along with solid proof of documents and provide as much information as possible for the investigation. Reports may submit to the following email address: accounts@adityafindings.com

Confidentiality:

Committee will guarantee with the outmost capability of Aditya Findings Pvt. Ltd. to keep the identity of the concern person confidential with respect to all events. Documents and files, they view and all information that comes from their knowledge will solely be used for the purpose of investigating illegal activities or non-compliance allegations to Aditya Findings Pvt. Ltd. policies.

Escalation Procedure and Timeline for Grievances and Whistleblowing

1. Submission of Grievance

- Responsible Party: Complainant (employee, client, customer, stakeholder, or end-user)
- Method: Submission via email
- Content Required:



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- Full details of the grievance or complaint
- Supporting documentation and evidence (if available)
- Name and contact information (optional for anonymous reporting)
- Timeline: At any time
- Confidentiality: Full confidentiality guaranteed by Aditya Findings Pvt. Ltd.

2. Acknowledgement of Receipt

- Responsible Party: Compliance Officer
- Action: Issue written acknowledgment of grievance receipt
- Timeline: Within 3 working days of submission

3. Preliminary Review and Risk Assessment

- Responsible Party: Grievances and Complaints Committee
- Actions:
 - Assess completeness of submission
 - Evaluate urgency and severity
 - Determine if the issue falls under Committee jurisdiction
- Timeline: Within 7 working days from acknowledgment

4. Initiation of Investigation

- Responsible Party: Assigned Investigators (from Compliance or Legal Dept.)
- Action:
 - Conduct internal investigation
 - Request clarifications or additional documents (if needed)
 - Interview relevant parties (when applicable)

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- Timeline: Investigation must be initiated within 10 working days from the preliminary review
- Duration: Completed within 20 working days, unless extended due to complexity

5. Escalation (if necessary)

If the issue cannot be resolved internally or requires higher authority or external reporting:

- Escalation to:
 - Senior Management apurva@adityafindings.com
 - Board Compliance Sub-Committee
 - External Auditor (if legally required or high-risk breach)
- Timeline for escalation decision: Within 5 working days of investigation conclusion

6. Issuing Final Decision and Corrective Actions

- Responsible Party: Grievances and Complaints Committee
- Action:
 - Issue a reasoned written decision
 - Recommend corrective or disciplinary actions
 - Notify the complainant (unless anonymous)
 - Update internal risk management systems
- Timeline: Within 10 working days from conclusion of investigation

7. Follow-Up and Monitoring

- Responsible Party: Compliance Officer
- Action:
 - Ensure implementation of corrective measures

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- Monitor resolution progress
- Re-assess for recurrence risk
- Timeline: Periodic check-ins at 30, 60, and 90 days after decision

8. Recordkeeping and Reporting

- Responsible Party: Compliance Department
- Action:
 - Securely store grievance records
 - Report summary of grievances and actions to senior management quarterly

Include anonymized data in annual compliance reports

Public Grievances against social & Ethical compliance of the ADITYA FINDINGS PVT. LTD..

If you come across any instance of non-compliance or deviation from our Ethical Policy, please feel free to contact us.

Stakeholders who wish to obtain a copy of our annual sourcing compliance report based on the OECD Guidelines may send a request to the email address provided below.

For any queries, concerns, or report requests, please contact us:

Sr No.	Mode	Details
(i)	By hand	Contact: MR. SANJAY SHAH (ACCOUNTS MANAGER)
(ii)	By Email	accounts@adityafindings.com

Prepared By: Compliance Officer

Approved By : Director

Date : 1st July 2026, Issue No. 02