

ADITYA FINDINGS PVT. LTD.
ETHICAL BUSINESS POLICY

2.1 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 personnel are expected and directed to comply with all applicable laws and regulations as well as all internal ADITYA FINDINGS PVT. LTD. rules and policies relating to their business activities.
- 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.

2.2 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. 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 company level policies
 - ⌚ Prevention of Money laundering Act 2002
 - ⌚ FATF 40 Recommendations and 8 special recommendations
- c. 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.
- d. Compliance officer ensure all the critical steps such as KYC & KYS, Identification of suspicious transaction, reporting to management and record keeping as required by the local act and legislations are complied with.
- e. Compliance officer carries out periodic review of AML/CFT compliances and submits his report to management on Quarterly basis.

2.3 Anti-Bribery and Facilitation Payment Policy:

- a. The ADITYA FINDINGS PVT. LTD. shall ensure complete prohibition of Bribery and

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facilitation payment across organization and in all the entities.

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

CAHRAs are.

***Angola ,Coast, Democratic Republic of the Congo ,Liberia, Sierra Leone,
Republic of the Congo & Zimbabwe Marange Diamond Fields***

ADITYA FINDINGS PVT. LTD. shall ensure that none of its supplies are coming from above sources. Sight Holder shall communicate its sourcing policy to all the stakeholders and will ensure effective implementation among them.

2.4 Gold & Platinum Group Of Metal Sourcing Policy:

Our Company is concerned about environment and social impacts of irresponsible mining.

We at ADITYA FINDINGS PVT. LTD. shall ensure that all our gold suppliers are in compliance with gold sourcing guidelines (Dodd- Frank rules, DRC & other applicable legislation).

Further, we are committed to ensure that sourcing of gold and precious metal products and articles thereof, are under the highest Social, Human right and Environmental standard cautions of trade.

2.5 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 such as RJC, SMETA, BSCI etc.

2.6 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.

2.7 Health and Safety

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ADITYA FINDINGS PVT. LTD. recognizes the need to develop a sustainable, value creating business and is committed to the following:

- 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.
- This review will use appropriate standards as required by prevailing laws, expert opinion and our knowledge of best practices.
- The review will lead to formulation of clearly described work practices and drills.
- All our staff will be trained in the manner required to adhere to these work practices and drills.
- All workplaces will be constructed to meet safety standards with local regulations as the minimum standards that will be applicable

2.8 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. any such reported incidents will be viewed as a serious violation of this Business Principles.
- c. We shall at no time condone the use of corporal punishment or other forms of mental or physical coercion.
- d. We encourages 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 rule or policy, including this Business Principles.

2.9 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

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minimum.

- c. As per our ADITYA FINDINGS PVT. LTD. policy no child labour or adolence 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.

2.10 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”

2.11 Human Rights

- ❖ All employees in the ADITYA FINDINGS PVT. LTD. facilities will be treated with equality, respect and dignity.
- ❖ 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
- ❖ The ADITYA FINDINGS PVT. LTD. strongly discourages any form of sexually coercive, threatening, abusive or exploitative behavior.

2.12 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:

- ⌚ Compliance with all applicable environmental laws and regulations
- ⌚ 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.
- ⌚ 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.

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- ⌚ Improvement of employee environmental awareness and performance through detailed policies and procedures, training, and recognition of excellence.

2.13 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.

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

If you come across any instance of non compliance or specific deviation from our ethical policy, please feel free to reach us.

Further in case if you are interested to obtained the copy of our sourcing annual compliance report based on OECD guidelines. Please send an email communication to below mentioned email address.

Sr No.	Mode	Details
(i)	By hand	Contact: Mr. Parag N. Shah (Director)
(ii)	By Email	parag@adityafindings.com