



B.H.C. DIAMONDS (U.S.A.) INC
529 Fifth Avenue, Suite #1701, New York, NY 10017 USA
Tel: +1 212-997-9195 / E-mail: accounts.usa@bhcdiamonds.com

Supply Chain Policy & Procedure

1) B.H.C. DIAMONDS (U.S.A.) INC (BHC) is a Diamond Trading Company. This policy confirms BHC's commitment to respect human rights, avoid contributing to the finance of conflict and comply with all relevant USA / UN sanctions, resolutions, and laws.

2) B.H.C. is a 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 for responsible supply chains of minerals from conflict-affected and high-risk areas.

3) We also commit to using our influence to prevent abuses by others. Our supplier is not from CAHRA, and we do not procure goods from CAHRA. Our Suppliers are compliant to OECD Guidelines and/or members of the RJC.

4) Regarding serious abuses associated with the extraction, transport, or trade of diamonds/coloured gemstones/Lab Grown Diamonds.

We will neither tolerate nor profit from, contribute to, assist, or facilitate the commission of:

- g. torture, cruel, inhuman, and degrading treatment.
- h. forced or compulsory labour.
- i. the worst forms of child labour.
- j. human rights violations and abuses; or
- k. war crimes, violations of international humanitarian law, crimes against humanity or genocide.

5) 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.



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6) Regarding direct or indirect support to non-state armed groups

We only sell or purchase diamonds/coloured gemstones that are fully compliant with the Kimberley Process Certification Scheme / WDC SoW and, as such, will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring diamonds/coloured gemstones from, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates who illegally:

- l. control mine sites, transportation routes, points where diamonds/coloured gemstones are traded and upstream actors in the supply chain; or
- m. tax or extort money or diamonds/coloured gemstones at mine sites, along transportation routes or at points where diamonds/coloured gemstones are traded, or from intermediaries, export companies or international traders.

7) 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.

8) 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.

9) Regarding bribery and fraudulent misrepresentation of the origin of diamonds/coloured gemstones

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

10) 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/coloured gemstones/Lab Grown Diamonds.

A handwritten signature in black ink, appearing to read 'C J R'.

President

Chirag Gandhi

2nd January 2025



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Vendor Code of conduct

1 Business Ethics

1. We are committed to conducting our businesses to a high ethical standard, and to ensuring integrity, transparency and conformance with Applicable Law.
2. We will not engage in Bribery and/or corruption.
3. We will not tolerate Money Laundering and/or financing of terrorism.
4. We will adhere to the Kimberley Process Certification System and the World Diamond Council Voluntary System of Warranties. We will not deal in conflict diamonds.
5. We will fully and accurately disclose the material characteristics of the products that we send you.
6. We will take reasonable measures to ensure the physical integrity and security of product shipments.
7. We will respect commercial confidentiality and data privacy.

2 Human Rights and Social Performance

1. We believe in and will respect the fundamental human rights and the dignity of the individual, according to the United Nations Universal Declaration of Human Rights.
2. We will not tolerate the use of Child Labour or forced, bonded, indentured or prison labour, nor restrict the freedom of movement of Employees and dependents.
3. We are committed to high standards of Health and Safety in our operations.
4. We will not prevent workers from associating freely.
5. We will not discriminate based on race, ethnicity, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, marital status, physical appearance, age, or any other applicable prohibited basis in the workplace.
6. We will not use corporal punishment under any circumstances and will prohibit the use of degrading treatment, harassment, abuse, coercion or intimidation in any form.
7. We will adhere to working hours and remuneration legislation.

3 Environmental Performance

1. We will conduct our business in an environmentally responsible manner.
2. We will manage our environmental footprint by eliminating or minimising negative environmental impacts.
3. We will comply with all applicable environmental Regulations

4 Legal Compliance

1. Kimberly System of Warranties – Conflict Free Diamonds
2. Irradiated Gemstone Requirements and Statutes
3. Coloured Diamond Requirements and Statutes
4. FCPA-Foreign Corrupt Practices Act
5. Patriot Act (Anti-Money Laundering) AML Program