

ETHICAL BUSINESS POLICY

2.1 Background

- a. At M. SURESH COMPANY PVT. LTD., our philosophy is to measure success by not only the results we achieve, but also how we achieve them.
- b. This Business Principles document, adopted by M. SURESH COMPANY PVT. LTD. sets forth the basic internal standards to be observed by all directors, officers and employees of the Company with respect to conducting business in a legal, ethical, professional and accountable manner.
- c. The company is required to take appropriate steps to ensure that the same is understood and put into practice by all of its directors, officers and employees.
- d. Also appropriate steps are taken to assure adherence to this Business Principles document, including establishing appropriate disciplinary procedures where violations of this document will result in sanctions up to and including discharge.

2.2 Legislation and Regulations

- a. M. SURESH COMPANY PVT. LTD. shall operate in compliance with relevant national and international legislations / regulations as applicable in the countries in which they operate.
- b. 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.

2.3 Money Laundering, Terrorism Financing, Other Financial Offences

- a. M. SURESH COMPANY PVT. LTD. recognizes the fact that entities in the gems and jewelry sector have to take on the onus of analyzing 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. M. SURESH COMPANY 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.
- 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& KYS, Identification of suspicious transaction, reporting to management and record keeping as required by the local act and legislations are complied with.

2.4 Kimberley Process and System of Warranties

- a. M. SURESH COMPANY PVT. LTD. is fully committed to complying with all the requirements specified in the Kimberley Process Certification Scheme and World Diamond Council's (WDC) System of Warranties Declaration.

2.5 Anti Bribery and Facilitation Payment Policy:

- a. The M. SURESH COMPANY PVT. LTD. shall ensure complete prohibition Bribery and facilitation payment across organization and in all the entities.
- b. Company 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. Anti shall prohibit bribery and facilitation payment and shall comply with various rules and regulations of the land.

2.6 Disclosure of Treated Diamonds, Synthetics and Simulant

- a. Full disclosure i.e the complete and total release of all available information about a Diamond and all material steps it has undergone prior to sale to the purchaser, irrespective of whether or not the information is specifically requested and regardless of the effect on the value of the diamond.
- b. No misuse of terminology or mis-representations or attempts to disguise the product will be made in the selling, advertising and distribution of treated diamonds, synthetics and simulant.
- c. The word 'diamond' will not be used in the case of names of firms, manufacturers or trademarks; in connection with treated diamonds or diamond simulant or synthetic Diamonds.

M. SURESH COMPANY PVT. LTD. has adopted the following definitions:

Diamond: A diamond is a natural mineral consisting essentially of pure carbon crystallized with a cubic structure in the isometric system.

Synthetic: A synthetic is any object or object that has been either partially or wholly crystallized or re-crystallized due to artificial human intervention such that, with the exception of being non-natural, the product meets the requirements specified in the definition of the word 'diamond' above.

Treated Diamond: A treated diamond is any object or product that meets the requirements specified in the definition of the words 'diamond' and 'synthetic' above, but has been subject to some form of treatment i.e. any process, enhancement changing, interfering with and/or contaminating the natural appearance or composition of a diamond other than historically accepted practices of cutting and

polishing.

Simulants: A diamond simulant is any object or product used to imitate some or all of the properties associated with a diamond and includes any material, which does not meet the requirements specified in the definition of the word 'diamond' above.

Note: Necessary declaration is provided on invoice incase of CZ or Stimulants are used in jewellery and same is communicated verbally prior to exe.

2.7 Gold Sourcing Policy:

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

Further sight holder group does not have any gold jewelry manufacturing facility however to keep in line with De Beers and RJC requirements this policy has been documented.

Further we are committed to ensure that sourcing of gold and precious metals products and articles are under the highest social, Human right and environmental standard of trade.

Our Overseas office is procuring diamond studded gold jewelry from our business associates. In such necessary declaration and assurance of Gold conflict free supplies are obtained. M Suresh group is committed to comply with conflict metals and minerals.

2.8 Supply Chain Management / Best Endeavors

The management of M. SURESH COMPANY PVT. LTD. *is* committed to taking appropriate action to use best endeavors to ensure the commitment of manufacturing contractors and entities to comply with the Best Practice Principles

2.9 Employment

- a. M Suresh will ensure all its shall comply to labour law rules as per applicable land law.

2.10 Health and Safety

- a. The Company is fully committed to the pursuance of applicable standards of health and safety, and the provision of a safe and healthy working environment for all its employees.

2.11 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 Company and any such reported incidents will be viewed as a serious violation of this Business Principles.

- c. M. SURESH COMPANY PVT. LTD. shall at no time condone the use of corporal punishment or other forms of mental or physical coercion

2.12 Child Labour

- a. No form of child labour should be employed at any of the facilities of M. SURESH COMPANY PVT. LTD.
- b. Unless local laws stipulate a higher age, the minimum age for employment that will be applicable is fifteen (As per ILO Convention No. 138).

2.13 Forced Labour

- a. The management of M. SURESH COMPANY 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.

2.14 Human Rights

- ❖ The Company strongly discourages any form of sexually coercive, threatening, abusive or exploitative behavior.
- ❖ Any reported incidents relating to direct or indirect physical, sexual, racial, religious, 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 company.

2.15 Environment Protection

M. SURESH COMPANY PVT. LTD. is committed to effective environmental management as one of its important corporate priorities. Compliance with all applicable environmental laws and regulations.