

# ACHAL JEWELS PVT. LTD.

G-43, EPIP, SITAPURA IND. AREA, JAIPUR

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## Sustainability and Responsible Business Commitments

### RJC Policy

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Achal Jewels Pvt. Ltd. Jaipur, India is a certified member of Responsible Jewellery Council (RJC) and committed for ethical business practices and compliance with RJC COP 2019 in all its business activities.

The management of Achal Jewels Pvt. Ltd. established responsible, ethical, social, Human rights and environmental practices throughout the supply chain of Gold Jewellery studded with Diamond & other Coloured Gemstone.

We are being a responsible entity of Jewellery supply chain believe in consumer confidence in our trade and request to our business partners to follow various requirements of RJC COP 2019 standard.

As a part of our best endeavours and responsible business entity, we anticipate co-operation of our business partners in adopting & compliant with respect to business, social and environmental responsibilities.

As an RJC certified Member, we are committed to integrating ethical, human rights, social and environmental considerations (issues & risks) into our day-to-day operations, business planning activities and decision-making processes.

This Policy will be monitored, at least once a year, through a review of the RJC system with senior managers and middle managers to identify potential gaps between the planning policy and the actual company practices, and the minutes of the meeting.

### Anti-Money Laundering Policy

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This policy is to help prevent and detect potential money laundering or terrorist financing activity. **Achal Jewels Pvt. Ltd.** takes a zero-tolerance approach to money laundering, terrorist activity and other such financial crimes.

**Achal Jewels Pvt. Ltd.** ensures it has appropriate policies and procedures in place to complement this AML policy.

The objectives of this policy are:

- To protect the company and its staff from the risks associated with breaches of the law, regulations and supervisory requirements;
- To preserve the good name of the company against the risk of reputational damage presented by implication in money laundering and terrorist financing activities;
- To make a positive contribution to the fight against crime and terrorism.

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Achal Jewels Pvt. Ltd. ensures that we will achieve these objectives by following activities:

- Every member of staff meets their personal obligations as appropriate to their role and position in the Company.
- Neither commercial considerations nor a sense of loyalty to clients shall be permitted to take precedence over the Company's anti-money laundering commitment.
- We maintain anti-money laundering policies and procedures outlining the actions to be taken by staff during their work, and continuously reviewing these policies to ensure their appropriateness.

The overall AML framework for **Achal Jewels Pvt. Ltd.** consist of:

- Anti-Bribery and Corruption Policy;
- AML Risk Assessment;
- Customer Due Diligence Policy;
- Disciplinary Policy;
- Reporting Suspicious Activity Policy;
- Whistle-blower Policy

This policy supports management's objective of mitigating the following risks:

- Money laundering;
- Terrorist financing;
- Sanctions;
- Politically exposed persons (PEPs);
- Legal and regulatory risk.

**Achal Jewels Pvt. Ltd. established a Whistle Blower Policy to Monitor & control any activities which comes under the money laundering or terrorist funding activities. If such condition found by anybody, he/she can directly Contact with our AML officer (Put Here Name)**

## Whistle Blower Introduction

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The term "whistle-blowing" originates from the practice of British policemen who blew their whistles whenever they observed commission of a crime. Whistle blowing means calling the attention of the top management to some wrongdoing occurring within an organization.

A whistle blower may be an employee, former employee or member of an organisation, a government agency, who have willingness to take corrective action on the misconduct.

## Whistle Blower policy

This policy is intended to encourage Board members, all staff and others to report suspected or actual occurrence(s) of illegal, unethical or inappropriate events (behaviours or practices) without retribution.

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## Whistle Blower Mechanism & Bribery Investigation method

1. Management Nominated Anti Bribery Squad for Investigation.
2. Mr. Ashish Vijay is President of this squad.
3. The Whistle-blower should promptly report the suspected or actual event to his/her supervisor.
4. If the Whistle-blower would be uncomfortable or otherwise reluctant to report to his/her supervisor, then the Whistle-blower could report the event to the next highest or another level of management, including to an appropriate Board committee or member.
5. The Whistle-blower can report the event with his/her identity or anonymously. Anybody who is employee of this company or any stakeholder or any interested parties can inform to this squad about any breach or violation of Anti Bribery & Anti Money Laundering Policy.
6. Information can be sent either by mail or written to the Anti Bribery Squad.
7. Name & identity shall be kept confidential of whistle blower person. Steps & provision shall be followed according to whistle blower policy.
8. A confidential investigation shall be done either by Management nominated external agency or Internal Anti bribery Squad.
9. After due evidences & observations, this team will be giving this report to the top management.
10. Company top management shall be deciding that identified activity is comes under Bribery, fraud or money laundering.
11. A documented disciplinary action shall be taken against accused by Anti Bribery Squad.
12. Any one of Following may be decided by Top management: -
  - ❖ A warning to the accused person.
  - ❖ A dismissal notes to the accused person.
  - ❖ A police FIR against the person who involve in such kind of activities.

## Supply Chain Policy

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Achal Jewels Pvt. Ltd. is a Jewellery Manufacturing company 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.

### Responsibility

himself is responsible to implement & monitor this policy throughout supply chain.

### Procedure: -

Achal Jewels Pvt. Ltd. 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

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- b) Respect 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 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 Minerals (Gold, Diamonds & gemstones)**

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 or downstream suppliers if we find a reasonable risk that they are committing abuses or are sourcing from, or linked to, any party committing these abuses.

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

- a) We will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates who illegally:
- b) control mine sites, transportation routes, points where gemstone is traded and upstream actors in the supply chain; or tax or extort money at mine sites, along transportation routes or at points where gemstones is traded, or from intermediaries, export companies or international traders.
- c) 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.

## **Regarding public or private security forces:**

- a) 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.

## **Regarding money laundering:**

- a) We will support efforts, or take steps, to contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers.

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## **Regarding bribery and fraudulent misrepresentation of the origin of minerals:**

- a) We will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export

## **Red flag circumstances:**

Anomalies or unusual circumstances are identified through the information collected in Step 1 which give rise to a reasonable suspicion that the gold/silver/diamond may contribute to conflict or serious abuses associated with the extraction, transport or trade of gold/silver/diamond.

## **Red flags identified or information unknown:**

Any gold/silver/diamond producer that identifies a red flag in gold/silver/diamond supply chain, or is unable to reasonably exclude one or more of these red flags from gold/silver/diamond supply chain, should proceed to risk assessment.

## **HUMAN RIGHTS POLICY AS PER UNGP PRINCIPLES**

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**Achal Jewels Pvt. Ltd. Jaipur** has the responsibility to respect human rights refers to internationally recognized human rights – understood, at a minimum, as those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work.

**Achal Jewels Pvt. Ltd.** is committed to

- a) avoid causing or contributing to adverse human rights impacts through our own activities, and address such impacts when they occur;
- b) Seek to prevent or mitigate adverse human rights impacts that are directly linked to our operations, products or services by our business relationships, even if they have not contributed to those impacts.

In order to meet our responsibility to respect human rights, we have in place policies and processes including:

- a) A policy commitment to meet responsibility to respect human rights;
- b) A human rights due diligence process to identify, prevent, mitigate and account for how they address impacts on human rights;
- c) Processes to enable the remediation of any adverse human rights impacts they cause or to which they contribute.

As the basis for embedding our responsibility to respect human rights, we express our commitment to meet this responsibility through a statement of policy that:

- a) Is approved at the most senior level of the management;
- b) Is informed by relevant internal and/or external expertise;
- c) Stipulates the enterprise’s human rights expectations of personnel, business partners and other parties directly linked to our operations, products or services;
- d) It is publicly available and communicated internally and externally to all personnel, business partners and other relevant parties;

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- e) Is reflected in operational policies and procedures necessary to embed it throughout the business enterprise.

In order to gauge human rights risks, we identify and assess any actual or potential adverse human rights impacts with which they may be involved either through our own activities or as a result of our business relationships.

This process should:

- a) Draw on internal human rights expertise;
- b) Involve meaningful consultation with potentially affected groups and other relevant stakeholders, as appropriate to the size of the business enterprise and the nature and context of the operation

In order to prevent and mitigate adverse human rights impacts, integrate the findings from our impact assessments across relevant internal functions and processes, and take appropriate action.

- a) Effective integration requires that: (i) Responsibility for addressing such impacts is assigned to the appropriate level and function within the business enterprise; (ii) Internal decision-making, budget allocations and oversight processes enable effective responses to such impacts.
- b) Appropriate action will vary according to: (i) Whether the business enterprise causes or contributes to an adverse impact, or whether it is involved solely because the impact is directly linked to its operations, products or services by a business relationship; (ii) The extent of its leverage in addressing the adverse impact.

In order to verify whether adverse human rights impacts are being addressed, **Achal Jewels Pvt. Ltd.** track the effectiveness of their response. Tracking should:

- a) Be based on appropriate qualitative and quantitative indicators;
- b) Draw on feedback from both internal and external sources, including affected stakeholders.

In order to account for how address human rights impacts, **Achal Jewels Pvt. Ltd.** prepared to communicate this externally, particularly when concerns are raised by or on behalf of affected stakeholders. In all instances, communications should:

- a) Be of a form and frequency that reflect human rights impacts and that are accessible to its intended audiences;
- b) Provide information that is sufficient to evaluate the adequacy of **Achal Jewels Pvt. Ltd.** response to the particular human rights impact involved;
- c) In turn not pose risks to affected stakeholders, personnel or to legitimate requirements of commercial confidentiality.

In all contexts, **Achal Jewels Pvt. Ltd.** Comply with all applicable laws and respect internationally recognized human rights, wherever they operate;

- a) Seek ways to honour the principles of internationally recognized human rights when faced with conflicting requirements;
- b) Treat the risk of causing or contributing to gross human rights abuses as a legal compliance issue wherever they operate.

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**Achal Jewels Pvt. Ltd.** has established a grievance procedure to hear concerns about any issue related with human right violation or any other unethical trade practice within company or supply chain.

## Grievance Mechanism: -

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**Achal Jewels Pvt. Ltd.** 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. Ashish Vijay is responsible for implementing and reviewing this procedure.

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

Mr. Ashish Vijay or Mr. Arihant Bhansali

Mobile No.: - 9414425106

Email: -ashish@achaljewels.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 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 document is endorsed by Director of the company.**

**Endorsed by**

**Date: - 02/04/2024**

**Place: - Jaipur**