

Niru Group responsible supply chain policy

1. Niru Group is part of De Beers and Alrosa Sightholder Group. Niru group is manufacturing customized diamonds, coloured stones and setting for leading watch and jewelry brands. The management of NIRU Group with all business partners-suppliers, sub-contractors, and business allies is based on fair, honest and mutually rewarding dealings contributing to high quality standards of products and services. This policy confirms Niru group's commitment to respect human rights, avoid contributing to the finance of conflict and comply with all relevant UN sanctions, resolutions and laws.

2. Niru group is a certified member of the Responsible Jewellery Council (RJC) and part of De Beers Best Practice Principles (BPP). 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.

In case of minor non-conformity from of our supplier, we will encourage the supplier to improve and monitor its performance, if no improvement within six months, we will disengage. In case of serious abuses like forced labor or supporting non state armed groups, we will stop immediately our engagement with the supplier.

Niru group has established a grievance procedure to hear concerns about circumstances in the supply chain involving diamonds/coloured gemstones from conflict affected and high-risk areas: Responsiblesourcing@nirugroup.com

4. Regarding serious abuses associated with the extraction, transport or trade of diamonds/coloured 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.

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.

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 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:

1. control mine sites, transportation routes, points where diamonds/coloured gemstones are traded and upstream actors in the supply chain; or
2. 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.

Rakesh Barmecha



Date of effect: 01/01/2022