

[2025]

Niru Group Global Responsible Sourcing Manual

NG-RS-013

Implementation Date: 2020
Reviewed: Jan 2025

Table of Contents

DOCUMENT APPROVAL.....	3
Introduction.....	4
1.Management Commitment.....	4
2.Risk Management Strategy	6
3.Supplier’s and Stakeholder’s Engagement	7
4.Risk Identification and Assessment in The Supply Chain.....	8
5.Risk Management Plan	8

DOCUMENT APPROVAL

This Niru Group Global Responsible Sourcing Manual represents the commitment of all Niru's entities to comply with local and international law, the requirements of the De Beer's Best Practice Principles scheme and the Principles and RJC's Code of Practices.

The contents of this document have been reviewed and approved by the group's C.E.O.

All employees of Niru group of companies are required to be familiar with this document and comply with various requirements contained in this document.

The group's C.O.O is responsible for making changes / revisions to this document and all employees are advised to bring to his attention any problems that they may face in the implementation of the requirements contained in this document.

Mr. Ranjeet
Barmecha
NIRU GROUP



RESPONSIBLE
JEWELLERY
COUNCIL



WORLD
DIAMOND
COUNCIL



is a trademark used under license from De Beers Group

Introduction

The Responsible Sourcing Policy sets forth Niru's commitments and strategy to avoid contributing to conflict or to any abuses when sourcing minerals from high-risks areas and is addressed to all Niru stakeholders worldwide.

The Responsible Sourcing Policy is consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas hereinafter "OECD Guidance" and is applicable to all minerals sourced by Niru. By using the five-step process of the OECD guidance, Niru will fulfill responsibility to respect human rights and avoid contributing to conflict through its mineral purchasing decisions and practices.

The OECD guidance endorsed by all 34 OECD members countries derived from the UN Guiding Principles and was built on and designed to be consistent with the OECD Guidelines for Multinational Enterprises. While the UN Guiding Principles and the OECD Guidelines for Multinational Enterprises define the principles and standards for responsible social, environmental, and business conduct, the Due Diligence Guidance outlines the process by which these commitments can be effectively achieved.

I. Management Commitment

1.1 Niru Responsible Sourcing Policy follows the Organization for Economic Cooperation and Development (*OECD*) Due Diligence Guidance for Responsible Supply Chains of Diamonds from Conflict-Affected and High-Risk Areas, the Kimberley Process Certification Scheme and supports the United Nations Guiding Principles on Business and Human Rights, including sanctions. Niru expects that its members and companies following this guidance will follow all applicable country laws, including those relevant to responsible sourcing. We undertake initiatives to promote greater environmental responsibility.

1.2 Niru strongly encourages all its stakeholders that they undertake due diligence on their own supply chain in accordance with the OECD's Due Diligence Guidance to

ensure that these supply chains are responsibly managed.

1.3 Niru Group implements the WDC Industry System of Warranties Guidelines for Diamond.

1.4 Niru will neither tolerate nor profit from, contribute to, assist, or facilitate the commission of serious abuses associated with the extraction, transport, or trade of minerals from conflict-affected and high-risk areas:

1.4.1 any forms of torture, cruel, inhuman, and degrading treatment.

1.4.2 any forms of forced or compulsory labor.

1.4.3 the worst forms of child labor.

1.4.4 other gross human rights violations and abuses such as widespread violence.

1.4.5 war crimes, violations of international humanitarian law, crimes against humanity and/or genocide.

1.5 Niru will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling, or export of minerals, including:

1.5.1 illegally controlled mine sites or otherwise controlled transportation routes.

1.5.2 illegally taxed or extorted money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or

1.5.3 illegally taxed or extorted intermediaries, export companies or international traders.

1.6 Bribery and fraudulent misrepresentation of the origin of minerals: Niru will not offer, promise, give or demand bribes and will resist the solicitation of bribes to conceal or disguise the origin of minerals or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport, and export of minerals.

1.7 Money laundering: Niru will support and contribute to efforts to eliminate money laundering where it identifies a reasonable risk 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.

2. Risk Management Strategy

2.1 To implement these commitments, Niru conducts an effective and comprehensive risk-based due diligence process, which includes Know your Counterparts (*KYC*) checks to identify its upstream and downstream partners, as well as all activities recommended by the OECD Guidance, as reflected in the OECD five-step framework. Ref “Niru group supplier management Guideline and Procedures”

2.1.1 As a certified member of the Responsible Jewellery Council (*RJC*), Niru is audited every 3 years by an independent third-party against the Responsible Jewellery Council (*RJC*) Code of Practices (*COP*), notably with respect to its human rights risk due diligence process.

2.1.2 Niru only buys or sells diamonds that are fully compliant with the Kimberley Process Certification Scheme and the World Diamond Council System of Warranties.

2.1.3 Niru only buys precious metals from refiners certified against the following international standards:

- 2.1.3.1 Responsible Jewellery Council (*RJC*) Code of Practices (*COP*); and
- 2.1.3.2 Responsible Jewellery Council (*RJC*)Chain-of-Custody (*COC*)

2.2 Niru commits to using its influence to prevent abuses within its supply chains. The following consequences will apply where Niru identifies a reasonable risk that a supplier is associated with one or more of the following risks:

- 2.2.1 Serious abuses associated with the extraction, trade and transport of minerals identified: Immediate suspension or disengagement.
- 2.2.2 Direct or indirect support to non-state armed groups as described in:

Immediate suspension or disengagement.

2.2.3 Direct or indirect support to public or private security forces who illegally control mine sites, transport routes and upstream actors (*including illegal taxation*): Temporary suspension, followed by implementation of measurable mitigative actions and monitoring. Suspension or disengagement if mitigation measures implemented are ineffective within reasonable timescales.

2.2.4 Money laundering, bribery, and fraudulent misrepresentation of the origin of minerals and non- payment of taxes, fees and royalties to governments: Temporary suspension, followed by implementation of measurable mitigative actions and monitoring. Suspension or disengagement if mitigation measures implemented are ineffective within reasonable timescales.

3. Supplier's and Stakeholder's Engagement

3.1 The Responsible Sourcing Commitments described in this Responsible Sourcing Policy are reflected in Niru's Suppliers Code of Conduct, which requires all suppliers, dealers, agents, subcontractors, and all business partners in general to adopt similar responsible sourcing practices and to comply with Niru's own principles and values. Niru seeks to establish long-term relationships, as appropriate, in accordance with the risk management strategy described in *section 4.* of this Responsible Sourcing Policy.

3.2 Niru commits to building capacity within its supply chains, including through training and dialogue, and to upholding the continuous improvement of suppliers' due diligence and sourcing practices.

3.3 Niru commits to supporting the formalization, development, and promotion of responsible sourcing practices within artisanal and small-scale mining (ASM) communities. Niru exclusively purchases gold and platinum from suppliers that are RJC (COC) or/and Responsible Gold.

3.4 Niru has a grievance mechanism, which allows all stakeholders to voice concerns regarding the circumstances of mineral extraction, trade, handling, and export associated with potential risks, please refer to the Grievance Procedure.

4. Risk Identification and Assessment in The Supply Chain

Following the implementation of the OECD Guidance, Niru Group policy has evolved to a risk-based approach to responsible sourcing.

4.1 Consequently, it does not exclude the entire country from its supply chain unless otherwise required by regulations (e.g., *embargo, sanctions*).

4.2 Human rights, social and environmental risks are identified through the following-

4.2.1 Location: Identification of whether the minerals and stones' extraction, transport or trade occur in a CAHRA. A CAHRA location will trigger a red flag in our risk assessment process. Our CAHRA determination methodology is based on a review of specialized and credible sources of country risks and is updated at least annually
(<https://www.cahraslist.net/>).

4.2.2 Sector: business sectors vary in terms of intrinsic risks for the environment and for human rights; an internal index has been developed to classify these business sectors.

4.3 Company Risk Assessment: Suppliers are assessed on their sustainability performance through desk-based research.

5. Risk Management Plan

5.1 To ensure compliance with sanctioned entities and individuals, we closely monitor the international sanctions published by governments and international organizations such as the Council of the EU; US – OFAC; UK – HM Treasury; United Nations Security Sanctions.

5.2 Should potential risks be identified through further scheduled risk assessment activities, a Risk Management Plan will be designed and implemented in collaboration with the supplier and affected stakeholders, where appropriate.

5.3 The Risk Management Plan refers to our Responsible Sourcing Policy and to OECD

Guidance. The actions will be considered depending on the type and severity of risk identified, they will be monitored and re-evaluated yearly or quarterly depending on the severity.

5.4 By taking these steps and utilizing these due diligence risk based approach, the company becomes aware of, prevents and addresses any potential and/or actual risks arising from its business activities that may infringe the human rights of its stakeholders.