

# LUNAWAT GEMS & JEWELS PVT. LTD.

G-1-42, SEZ II, SITAPURA IND. AREA, JAIPUR

## SUPPLY CHAIN POLICY

### 1. Purpose

Lunawat Gems and Jewels Private Limited (“the Company”) is committed to maintaining a responsible, ethical, and transparent supply chain for the sourcing, manufacturing, and distribution of gemstones, precious metals, and jewellery products. This policy is aligned with the Responsible Jewellery Council (RJC) Code of Practices and the OECD Due Diligence Guidance for Responsible Mineral Supply Chains. The Company aims to prevent risks related to human rights abuses, conflict financing, money laundering, bribery, and unethical sourcing practices.

### 2. Scope

This policy applies to all suppliers, contractors, service providers, and business partners associated with the Company. It covers the procurement of diamonds, coloured gemstones, gold, silver, and other materials used in the manufacturing of jewellery products. All stakeholders in the supply chain are expected to comply with this policy and operate in accordance with applicable national and international laws.

### 3. Policy Commitment

The Company is committed to sourcing materials only from legitimate and verified suppliers who adhere to ethical business practices. It maintains a zero-tolerance approach toward involvement in conflict minerals, human rights violations, corruption, and illegal activities. The Company ensures that all sourcing activities comply with legal and regulatory requirements, including import-export laws, anti-money laundering regulations, and trade compliance standards.

### 4. OECD-Based Due Diligence Framework

In line with OECD guidelines, the Company follows a structured due diligence framework. It establishes strong internal management systems, including clear policies, record-keeping procedures, and assigned responsibilities for compliance. The Company conducts risk assessments to identify potential issues such as conflict financing, child labour, forced labour, and environmental harm. Where risks are identified, appropriate mitigation measures are taken, including supplier engagement, corrective action plans, or discontinuation of business relationships where necessary. The Company also encourages third-party audits and maintains transparency through regular reporting.

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SIDDHARTH LUNAWAT	01.04.2026	01	

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## 5. Human Rights Commitment

The Company respects internationally recognized human rights and is committed to ensuring that its operations and supply chain are free from child labour, forced labour, discrimination, and unsafe working conditions. It takes necessary steps to address and remediate any adverse human rights impacts identified within its supply chain.

## 6. Supplier Due Diligence (KYS)

To ensure responsible sourcing, the Company conducts supplier due diligence through Know Your Supplier (KYS) procedures. This includes verification of supplier credentials, collection of business licenses, and assessment of the origin of materials. Supplier risk profiles are maintained and periodically reviewed to ensure ongoing compliance with this policy.

## 7. Traceability and Transparency

The Company strives to maintain traceability and transparency in its supply chain. It keeps records of material origin and supply chain information to the extent possible, particularly for precious metals and gemstones. This ensures that sourcing is conducted responsibly and in accordance with RJC standards.

## 8. Anti-Corruption and AML

Lunawat Gems and Jewels Private Limited maintains a strict zero-tolerance policy against bribery, corruption, and money laundering. Any suspicious activities or transactions are reported and investigated in accordance with applicable laws and internal policies.

## 9. Environmental Responsibility

The Company is committed to environmental responsibility and encourages sustainable sourcing practices. It seeks to minimize environmental impact and promotes adherence to environmental regulations among its suppliers and partners.

## 10. Grievance Mechanism (Whistleblower)

A grievance mechanism, including a whistleblower system, is established to allow employees, suppliers, and stakeholders to report any ethical concerns or violations related to the supply chain. The Company ensures confidentiality and protection against retaliation for individuals who raise concerns in good faith.

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## 11. Continuous Improvement

The Company is committed to continuous improvement and regularly reviews its supply chain practices to ensure alignment with evolving international standards and best practices. Training and awareness programs are conducted for employees and suppliers to strengthen responsible sourcing practices.

## 12. Supplier Compliance

All suppliers are required to adhere to this policy and demonstrate compliance through transparency, cooperation, and willingness to undergo audits if required.

## 13. Governance and Responsibility

The Company's management is responsible for overseeing the implementation of this policy, while the compliance and procurement teams ensure adherence at all levels.

## 14. Monitoring and Review

This policy will be reviewed periodically and updated as necessary to reflect changes in regulatory requirements and international standards. It will also be communicated to stakeholders and made publicly available as part of the Company's commitment to transparency and responsible business practices.

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