

# JS DIAMOND

## **Document Name: Policy Statement of Human Rights**

**Document Number:** JSD-POL-005

**Review Date:** 08/01/2026

**Document Validity:** 2026–2027

**Next Revision Date:** 07/01/2027

**Approved By:** Top Management

**Applicable To:** All employees, contract workers, trainees, and business partners

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We, JS DIAMOND, recognize our responsibility to respect human rights. We believe that our business has a role to play in protecting and promoting human rights.

JS DIAMOND is committed to respect internationally recognized human rights throughout our operations and supply chains. In line with the UN Guiding Principles on Business and Human Rights, our Policy is based upon the international standards enshrined in the Universal Declaration of Human Rights and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

Human rights refer to a set of basic rights and freedoms that belong to every person in the world, regardless of where they are from, what they believe or how they choose to live their life. It is a broad concept, with economic, social, cultural, political and civil dimensions. For JS DIAMOND, respecting human rights means ensuring that any person involved in, or coming into contact with, our operations, supply chains and products is treated with dignity, respect, fairness and equality.

Our Policy sets out overarching principles for how we conduct business at JS DIAMOND, together with our employees and business partners, we are committed to drive forward the implementation of this Policy throughout our operations and supply chains. We recognize unique challenges to these standards may arise and we will work to address these challenges in partnership with relevant partners and stakeholders.

ETI Base Code as reference as well as the RJC COPs related to labour rights, working conditions and health & safety.

1. Employment is freely chosen
2. Freedom of association
3. Working conditions are safe and hygienic
4. Child labour shall not be used
5. Living wages are paid
6. Working hours are not excessive

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7. No discrimination is practiced
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed

JS DIAMOND will continuously work to embed this Policy throughout the relevant processes and procedures of the company to ensure its effective implementation.

We recognize that we must take steps to identify and address any actual or potential adverse impacts, whether they are directly or indirectly linked to our business activities or relationships.

We understand that human rights due diligence is a dynamic, on-going process which requires acting on the findings, tracking our actions, and communicating to our stakeholders how we address impacts.

As our human rights risks and impacts may vary over time, this policy will be subject to review if proven inadequate by our human rights due diligence process.

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## **Document Name: Policy Statement of Child Labour**

**Document Number:** JSD-POL-001

**Review Date:** 08/01/2026

**Document Validity:** 2026–2027

**Next Revision Date:** 07/01/2027

**Approved By:** Management

**Applicable To:** All units, departments, employees, contractors, and business partners

### **1. Purpose**

JS DIAMOND is committed to respecting children's rights and ensuring that no child is employed in any form of work that is economically exploitative or likely to interfere with the child's education, health, safety, or development. This policy aims to ensure strict compliance with applicable child labour laws and international standards and to prohibit the employment of child labour in any form across our operations and supply chain.

### **2. Scope**

This policy applies to:

- All employees, including permanent, temporary, contract, trainee, and apprentice workers
- Contractors, subcontractors, agents, and suppliers
- All company locations and group entities

### **3. Policy Statement**

JS DIAMOND of Companies strictly prohibits the employment of child labour.

- No person below the minimum legal working age shall be employed or engaged in any capacity.
- The company complies with all applicable national laws, the International Labour Organization (ILO) Conventions, BPP and RJC Code of Practices related to child labour.
- Under no circumstances shall children be engaged in hazardous work or any activity that may harm their health, safety, education, or moral development.

### **4. Minimum Age Requirements**

- The minimum age for employment shall be in accordance with local labour laws and shall not be less than **15 years**, or higher where mandated by law.
- For hazardous work, the minimum age shall be **18 years**.
- Valid and verifiable age proof documents are mandatory prior to employment.

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## 5. Age Verification Process

- The company verifies age at the time of recruitment using government-issued documents such as Aadhaar Card, Birth Certificate, Passport, or School Leaving Certificate.
- Records of age verification shall be maintained as part of employee documentation.

## 6. Remediation Measures

In the event that a child labour case is identified:

- Immediate action shall be taken to remove the child from the workplace.
- The company shall support remediation measures focused on the child's welfare, education, and protection, without causing financial hardship to the family.
- Such cases shall be reported to management and handled in accordance with legal requirements.

## 7. Supplier and Business Partner Compliance

- All suppliers and business partners are expected to comply with this policy.
- The company reserves the right to conduct assessments or audits to verify compliance.
- Non-compliance may result in corrective actions or termination of business relationships.

## 8. Roles and Responsibilities

- **Management:** Ensure effective implementation and enforcement of this policy.
- **HR Department:** Conduct age verification and maintain records.
- **Employees:** Report any suspected violation of this policy through appropriate channels.

## 9. Awareness and Training

The company shall communicate this policy to employees and provide awareness sessions as required to ensure understanding and compliance.

## 10. Review and Revision

This policy shall be reviewed annually to ensure continued compliance with legal and ethical requirements.

# JS DIAMOND

## **Document Name: Policy Statement Use of Supply Chain**

**Document Number:** JSD-POL-013

**Review Date:** 08/01/2026

**Document Validity:** 2026–2027

**Next Revision Date:** 07/01/2027

**Approved By:** Top Management

**Applicable To:** All employees, contract workers, trainees, and business partners

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JS DIAMOND shall complete the due diligence process prior to initiate business relationship. The company shall purchase/sale diamonds that are fully compliant with Kimberly Process Certification Scheme (KPCS).

JS DIAMOND shall ensure that all of its respective activities are in line with the OECD Due Diligence Guidelines, The Responsible Jewellery Council Standard and as per Universal Declaration on Human Rights laid down by United Nations.

The company shall prohibit any procurement from Conflict-Affected & High-Risk areas and adhere to compliance with standards on Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT).

Relevant Employees shall be trained on the Supply Chain & Due Diligence Requirement and OECD guideline at regular interval. We shall also provide support to our business partners and stakeholder for the same.

The company shall carry out risk assessment for its supply chain and shall not enter into any business relationship or if may require then shall suspend/discontinue the engagement with any such supplier involved in dealing with Conflict-Affected and High-Risk areas, Any form of Human Right Violation; Torture, Cruel, In-Human and Degrading Treatment; Forced/Compulsory Labour; Child Labour; Abuses such as widespread Sexual Violence; War Crimes; other serious violations of International Humanitarian Law, Crime against Humanity; Genocide and/or To Bribe or To be Bribed. We strictly condemn and prohibit any Direct/Indirect support to public/private security forces which illegally Control, Tax or Extort money from Mining Sites, Transportation Routes and Upstream Sectors.

The company shall verify counterparty details, including the Know Your Customer (KYC) for any precious metals supplying Counterparties at regular interval. The company shall carry out risk-based assessment, set appropriate verification control and monitoring of all such commercial activities and transactions.

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The company shall assign responsibility of Supply Chain Integrity and due diligence compliance to senior personnel of the organisation to prevent any risk of illegal activities or breach of it. The company shall implement the management strategy to respond to identified risks. For the same, Compliance Officer shall report to Senior Management in case of any such violation of this policy.

The company has established a risk assessment module and any business partners with high-risk rating shall be red flagged and report to be submitted to senior management.

## **Grievance Mechanism**

The purpose of this document is to outline a process through which any stakeholder can understand due diligence and supply chain integrity policy of the organization. The identity of the person who so ever has registered a concern shall be kept confidential and no retaliatory action shall be taken against any whistle blower. For anonymous submissions, you may refrain to provide your contact information.

Please share your Complaint/Grievance/Suggestion on [jsdiamond@yahoo.com](mailto:jsdiamond@yahoo.com)

# JS DIAMOND

## Document Name: RJC Compliance Policy

**Document Number:** JSD-POL-015

**Review Date:** 08/01/2026

**Document Validity:** 2026–2027

**Next Revision Date:** 07/01/2027

**Approved By:** Top Management

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The Responsible Jewellery Council (RJC) is a not-for-profit organization with the following mission:

*“To advance responsible ethical, social and environmental practices, which respect human rights, throughout the diamond and gold jewellery supply chain, from mine to retail”*

RJC’s “Code of Practices” defines responsible ethical, human rights, social, and environmental practices, applicable to all RJC members.

**JS DIAMOND** is going to become a member of RJC and is fully committed to the Code of Practices.

We strongly encourage all our business partners to follow and implement the various requirements of the RJC system. More information about the Program is available on the internet site <http://www.responsiblejewellery.com>.

We encourage your co-operation in adopting the standard and ensuring that the entire diamond industry is seen as a role model in setting high standards with respect to business, social and environmental responsibilities.

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## JS DIAMOND

### Annual Reporting on Responsible Sourcing and Due Diligence Mechanism

Doc. No JSD-ARN-003

<b>PARTICULARS</b>	<b>NAME</b>	<b>DATE</b>
<b>PREPARED BY</b>	<b>MR. ARSHITBHAI VADADORIYA</b>	<b>05-04-2025</b>
<b>CHECKED BY</b>	<b>MR. NARESHBHAI KANJIBHAI VADADORIYA</b>	<b>05-04-2025</b>
<b>APPROVED BY</b>	<b>MR. NARESHBHAI KANJIBHAI VADADORIYA</b>	<b>05-04-2025</b>
<b>NEXT REVISION DATE</b>		<b>04-05-2026</b>

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<b>Date:</b>	<b>[04/04/2025]</b>
<b>Reporting period:</b>	<b>[04/2024] to [03/2025]</b>
<b>OECD Due Diligence Guidance</b>	<b>Action taken</b>
<b><i>Step 1: Establish strong company management systems</i></b>	
<p><b>1. A Adopt, and clearly communicate to suppliers and the public, a company policy for the supply chain of minerals originating from conflict-affected and high-risk areas.</b></p>	<p>Sourcing Policy has been established with document no.<b>JSD-POL-015</b>.</p> <p>Sourcing Policy communicated to internal interested parties through training and also displayed on notice board.</p> <p>Sourcing Policy has been communicated to external interested parties through Email communications and available on website jsdiamond.co and also displayed on notice board in office premises so that visitors can have access to it.</p>
<p><b>1. B Structure internal management systems to support supply chain due diligence.</b></p>	<p>The Company has prepared Manuals for Sourcing compliance and due diligence which includes procedure for risk assessment, methods for identification of red flags, risk mitigation etc.</p> <p>Training on responsible sourcing has been imparted to relevant personnel.</p> <p>The company has appointed senior official <b>MR. ARSHIT VADADORIYA</b> who bears the competence, knowledge and experience to be responsible for implementing due diligence management system.</p>
<p><b>1. C Establish a system of controls and transparency over the minerals supply chain.</b></p>	<p>The Company collects supplier details through KYC/KYS documents from each associated parties which include Business registration documents, Completed KYC questionnaire. Also checks against relevant government lists</p>

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	<p>for individuals or organisations implicated in money laundering, fraud or involvement with prohibited organisations and/or those financing conflict.</p> <p>The company collects all information pertaining to physical description and origin of supplies from suppliers for each parcel through Invoice and sales documents and Gemmological laboratory reports and/or certificates.</p> <p>The company has established supplier packet and shared with all the suppliers along with the company's requirement and obligations to comply with OECD requirements to make engagement with suppliers, the supplier packet which contains questions related to sourcing, their supplier due diligence mechanism etc.</p>
<p><b>1. D Strengthen company engagement with suppliers.</b></p>	<p>The company has established supplier's packet and shared with all the suppliers along with OECD requirements and its 5 steps of due diligence mechanism.</p> <p>The suppliers packet also contains agreement to take reasonable steps to ensure that all the supplies are supplied in accordance with Company's policy on supply chain/sourcing.</p>
<p><b>1. E Establish a company-level, or industry wide, grievance mechanism as an early warning risk-awareness system.</b></p>	<p>The company has established this grievance procedure to hear concerns about circumstances in the supply chain involving supplies from conflict-affected and high-risk areas.</p> <p>The company shares email address on each invoices and also in supply chain/sourcing policy to contact to register grievance.</p> <p>The company also maintains grievance register to keep records on monthly basis.</p>

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<b>Step 2: Identify and assess risk in the supply chain</b>	
<b>Identify and assess risks in the supply chain and assess risks of adverse impacts.</b>	<p>The company has conducted risk assessment of all the suppliers based on information from supplier's packet, government assessments and from official websites.</p> <p>No any red flag identified nor any suppliers found from conflict affected high risk areas.</p>
<b>Step 3: Design and implement a strategy to respond to identified risks (if applicable)</b>	
<b>Report findings of the supply chain risk assessment to the designated senior management of the company.</b>	<b>MR. NARESHBHAI KANJIBHAI VADADORIYA</b> receives the findings of risk assessments.
<b>Devise and adopt a risk management plan.</b>	The company has established risk mitigation plan to respond to the risks and impacts if identified.
<b>Implement the risk management plan and monitor performance of risk mitigation efforts.</b>	The company has developed a Monitoring and evaluation plan to monitor and track the effectiveness of mitigation measures, including the results of follow-up activities after six months to evaluate significant and measurable improvement
<b>Internal training</b>	The company provides training to all relevant employees every six months.
<b>Communications</b>	The company takes feedback from stakeholders if any risk identified and based on procedure to summaries the outcome of your engagement with relevant stakeholders.
<b>OPTIONAL INFORMATION ON Step 4: Carry out independent third-party audit</b>	
<b>Annual audit</b>	The company has appointed an independent third-party auditor, who conducts audits twice a year. The most recent audit was conducted six months ago, and no non-conformances were identified.
<b>Grievances and remediation</b>	The company has not received any grievance in the assessment year.

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## COP 6 & 7: HUMAN RIGHTS & DUE DILIGENCE

### CONTACT INFORMATION

COMPANY NAME: JS DIAMOND  
DATE: 05.01.2025  
REPORTING PERIOD: JANUARY 2025 to DECEMBER 2025  
CONTACT:

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### COMPANY MANAGEMENT SYSTEMS

JS DIAMOND have the following policies in place, detailing our commitment to respect human rights throughout our supply chain and our supply chain due diligence on the natural Diamonds originating from conflict-affected and high-risk areas. JS DIAMONDLTD. endorse these policies to our suppliers and stakeholders by distributing them via Email, these policies can also be accessed by our internal stakeholders via notice board display & contact compliance manager and externally via Email.

### Reference Document:

RESPONSIBLE PERSON NAME & DESIGNATION		MR. ARSHIT VADADORIYA – COMPLIANCE MANAGER		
S.NO	REF .NO	DOCUMENT NAME	ISSUE DATE	NEXT REVIEW DATE
1	JSD-POL-16	Policy Statement of RJC Compliance	JANUARY 2025	JANUARY 2026
2	JSD-POL-07	Policy Statement of Human Rights	JANUARY 2025	JANUARY 2026
3	JSD-POL-15	Policy Statement of Supply Chain	JANUARY 2025	JANUARY 2026

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## COMPANY IMPLEMENTED SYSTEM

### A. Supply Chain Due diligence:

To support supply chain due diligence, we have implemented the following internal measures:

1. Appointment of Senior Manager – Mr. Arshit Vadadoriya is responsible for overseeing supply chain due diligence.
2. Establishment and implementation of Human rights and Supply chain policy.
3. **Mr. Arshit Vadadoriya**, Senior manager is responsible for the same.
4. Conducting Human right due diligence review once in six months to identify and mitigate human rights risk in our products and services.
5. Communication of human rights system to stakeholders and suppliers through Email.

### Reference Document:

RESPONSIBLE PERSON NAME & DESIGNATION		MR. ARSHIT VADADORIYA – COMPLIANCE MANAGER		
S.NO	REF .NO	DOCUMENT NAME	ISSUE DATE	NEXT REVIEW DATE
1	JSD-AML-01	Appointment order of Senior Manager	JAN-2025	-
2	JSD-POL-07	Policy Statement of Human Rights	JANUARY 2025	JANUARY 2026
3	JSD-POL-15	Policy Statement of Supply Chain	JANUARY 2025	JANUARY 2026
4	JSD-HRT-08	Human rights Due diligence	JANUARY 2025	JANUARY 2026

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## B. supply Chain Transparency Control

**JS DIAMOND** have established a system of controls and transparency over our supply chain, which include our approach for identifying suppliers and identifying sources of our materials.

1. The company shall purchase/sale polished Diamonds that are fully compliant with Legal Requirements.
2. The company shall ensure that all of its respective activities are in line with the OECD Due Diligence Guidelines, The Responsible Jewellery Council Standard and as per Universal Declaration on Human Rights laid down by United Nations.
3. Relevant Employees shall be trained on the Supply Chain & Due Diligence Requirement and OECD guideline at regular interval. We shall also provide support to our business partners and stakeholder for the same.
4. The company shall carry out risk assessment for its supply chain and shall not enter into any business relationship or if may require then shall suspend/discontinue the engagement with any such supplier involved in dealing with Conflict-Affected and High-Risk areas
5. The company shall verify counterparty details, including the Know Your Supplier (KYS) for any precious metals supplying Counterparties at regular interval.
6. As a company we communicate our expectations regarding human rights and supply chain due diligence by through Email at frequent intervals. In addition to this, we also take following steps to strengthen our engagement with suppliers; Conducting due diligence on human rights and responsible sourcing once to achieve continual improvement.

### **Reference Document:**

RESPONSIBLE PERSON NAME & DESIGNATION		MR. ARSHIT VADADORIYA – COMPLIANCE MANAGER		
S.NO	REF .NO	DOCUMENT NAME	ISSUE DATE	NEXT REVIEW DATE
1	JSD-CRA-001	Due Diligence procedure	JANUARY 2025	JANUARY 2026
2	JSD-CRA-001	Due diligence Responsible sourcing	JANUARY 2025	JANUARY 2026
3	JSD-ARN-001	Annual reporting Responsible sourcing	JANUARY 2025	JANUARY 2026

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## C. Grievance Mechanism

Our grievance mechanism for internal stakeholders can be accessed via contacting senior manager, grievance register and suggestion box. Our external grievance mechanism is available via Email to [jsdiamond@yahoo.com](mailto:jsdiamond@yahoo.com) The employee responsible for these grievance mechanism(s) is Mr. Arshit Vadadoriya (Senior Manager).

The purpose of this Grievance mechanism is to outline a process through which any stakeholder can understand due diligence and supply chain integrity policy of the organization. The identity of the person who so ever has registered a concern shall be kept confidential and no retaliatory action shall be taken against any whistle blower. For anonymous submissions, you may refrain to provide your contact information.

Please share your Complaint/Grievance/Suggestion on [jsdiamond@yahoo.com](mailto:jsdiamond@yahoo.com)

**Mr. Arshit Vadadoriya** is responsible for implementing and reviewing this procedure.

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

<b>Name</b>	Mr. Arshit Vadadoriya
<b>Mobile phone</b>	+91 9998769654
<b>Email address</b>	<a href="mailto:jsdiamond@yahoo.com">jsdiamond@yahoo.com</a>

### **Reference Document:**

<b>RESPONSIBLE PERSON NAME &amp; DESIGNATION</b>		<b>MR. ARSHIT VADADORIYA – COMPLIANCE MANAGER</b>		
<b>S.NO</b>	<b>REF .NO</b>	<b>DOCUMENT NAME</b>	<b>ISSUE DATE</b>	<b>NEXT REVIEW DATE</b>
1	MBE-POL-15	Policy Statement of Supply Chain	JANUARY 2025	JANUARY 2026
2	MBE-CRA-12	CAHRA Grievance register	Monthly	Monthly

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## D. IDENTIFIED & ASSESSED RISKS

We assess our own and supplier's due diligence practices and those relating to human rights by conducting due diligence for Human rights process.

During our assessment of our own and our supplier's due diligence practices and those relating to human rights, we identified the low risks within our supply chain. So, there is no further action required.

### Reference Document:

RESPONSIBLE PERSON NAME & DESIGNATION		MR. ARSHIT VADADORIYA – COMPLIANCE MANAGER		
S.NO	REF .NO	DOCUMENT NAME	ISSUE DATE	NEXT REVIEW DATE
1	JSD-HRT-08	Human rights Due diligence	JANUARY 2025	JULY 2025
2	JSD-HRT-007	Human rights Breach incidents register	Monthly	Monthly

As a result of these risks being identified we have also taken the following steps to enhance our internal systems and controls:

1. Mitigation control plan is established and implemented
2. Monitoring documents is established and implemented.
3. Appointment of Responsible person for monitoring.

## E. Strategy:

Our risk assessment findings are received by Director of **JS DIAMOND**.

To respond to the risks identified within our supply chain, we took the following steps to design and implement a risk management plan. Our risk management plan consists of the following: mitigation plan, monitoring document, responsible person for monitoring and next review date.

In addition to this, we evaluated improvement of this risk after six months through due diligence process.

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RESPONSIBLE PERSON NAME & DESIGNATION		MR. ARSHIT VADADORIYA – COMPLIANCE MANAGER		
S.NO	REF .NO	DOCUMENT NAME	ISSUE DATE	NEXT REVIEW DATE
1	JSD-HRT-014	Human rights Due diligence	JAN 2025	JULY 2026
2	JSD-HRT-007	Human rights Breach incidents register	Monthly	Monthly
3	JSD-CRA-001	Due diligence Responsible sourcing	JANUARY 2025	JANUARY 2026
4	JSD-ARN-001	Annual reporting Responsible sourcing	JANUARY 2025	JANUARY 2026

## F. Training and Capacity Building:

**JS DIAMOND** has provided the training regarding human rights and other RJC requirements to our employees in AUGUST 2025; this training included information on human rights process in our organization. We have also provided training regarding our due diligence activities to all of our employees on same date; this training included information on due diligence process in our organization.

RESPONSIBLE PERSON NAME & DESIGNATION		MR. ARSHIT VADADORIYA – COMPLIANCE MANAGER		
S.NO	REF .NO	DOCUMENT NAME	TRAINING DATE	NEXT TRAINING DATE
1	JSD-TRN-002	Training records	FEB 2025	AUG 2025

## G. Due diligence communication:

**JS DIAMOND** communicate to our stakeholders regarding our due diligence activities and efforts to prevent human rights risks. This communication is in the form of Email. When a human rights risk is identified we communicate the risk and how we are addressing it to potentially affected stakeholders by Email.

Since our last report no grievances have been raised regarding human rights risks or our supply chain due diligence:

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RESPONSIBLE PERSON NAME & DESIGNATION		MR. ARSHIT VADADORIYA – COMPLIANCE MANAGER		
S.NO	REF .NO	DOCUMENT NAME	ISSUE DATE	NEXT REVIEW DATE
1	JSD-HRT-08	Human rights Due diligence	JAN 2025	JULY 2025
2	JSD-HRT-007	Human rights Breach incidents register	Monthly	Monthly
3	JSD-CRA-001	Due diligence Responsible sourcing	September 2024	March 2025
4	JSD-ARN-001	Annual reporting Responsible sourcing	January 2024	January 2025