

Supply Chain Policy as per RJC COP 2024 Requirements

Purpose

This Supply Chain Policy outlines our commitment to conducting business ethically and responsibly, in alignment with the requirements and principles of the Responsible Jewellery Council (RJC) Code of Practices 2024 (COP 2024).

Scope

This policy applies to all suppliers, sub-suppliers, service providers, and business partners involved in the sourcing, processing, manufacturing, and distribution of materials and products throughout our supply chain. It covers Sourcing of Diamond, Gold, Silver & Color Gemstones.

Core Policy Principles

Gallant Jewelry is a certified member of the Responsible Jewellery Council (RJC), As such we commit to proving, through independent third-party verification: -

- ❖ Respect human rights according to the Universal Declaration of Human Rights and International Labour Organization
- ❖ Respect for internationally recognized human rights, including those outlined by the UN Guiding Principles on Business and Human Rights.
- ❖ Strict prohibition of child labor, forced labor, slavery, and human trafficking in any form, in line with ILO conventions.
- ❖ Ensuring safe, healthy, and hygienic working conditions, providing necessary personal protective equipment and emergency preparedness.
- ❖ Guaranteeing fair wages, reasonable working hours, and providing benefits in accordance with local laws and industry standards.
- ❖ Upholding the right to freedom of association and collective bargaining.
- ❖ Ensuring non-discrimination and equal opportunity in employment, prohibiting harassment and abuse.
- ❖ Do not engage in or tolerate bribery, corruption, money laundering or finance of terrorism;
- ❖ Support transparency of government payments and rights-compatible security forces in the extractives industry;
- ❖ Do not provide direct or indirect support to illegal armed groups;
- ❖ Enable stakeholders to voice concerns about the Jewellery supply chain; and
- ❖ are implementing the OECD five-step framework as a management process (and Supplement on Gold if applicable) for risk-based due diligence for responsible supply chains of minerals from conflict-affected and high-risk areas.
- ❖ We also commit to using our influence to prevent abuse by others

Responsibility

Mr. Sachin Jain CEO himself is responsible for monitoring of responsible sourcing & supplier management

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Responsible Sourcing of Materials:

Conducting thorough due diligence to identify, assess, and mitigate risks associated with the origin and chain of custody of precious metals, gemstones, and other materials.

- Promoting transparency and traceability within the supply chain to enable responsible sourcing verification.
- Adherence to all relevant international laws and regulations regarding mineral sourcing.

Regarding serious abuses associated with the extraction, transport or trade of gold:

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 abuse; or
- e) war crimes, violations of international humanitarian law, crimes against humanity or genocide.

We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are committing abuses described in paragraph 4 or are sourcing from, or linked to, any party committing these abuses.

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

We will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring gold from, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates who illegally:

- a) control mine sites, transportation routes, points where gold is traded and upstream actors in the supply chain; or
- b) tax or extort money, or gold at mine sites, along transportation routes or at points where gold 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.

d) 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.

e) Regarding bribery and fraudulent misrepresentation of the origin of gold:

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

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f) 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 gold.

Supplier Obligations and Due Diligence

All suppliers are required to:

- Comply with this Supply Chain Policy and all applicable laws and regulations in their operations.
- Implement their own due diligence processes to ensure compliance within their respective supply chains.
- Provide accurate and timely information upon request regarding their sourcing practices, labor conditions, and environmental policies.

Monitoring, Compliance, and Enforcement

We will monitor compliance with this policy through various means, including supplier questionnaires, risk assessments, third-party audits, and site visits where appropriate. Non-compliance identified may result in corrective action plans, suspension of business, or termination of contracts, depending on the severity and nature of the violation.

Grievance Mechanism: -

Gallant Jewelry, Jaipur, has established this grievance procedure to hear concerns about circumstances in the supply chain involving Gold/Silver/Diamonds/coloured gemstones from conflict-affected and high-risk areas.

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

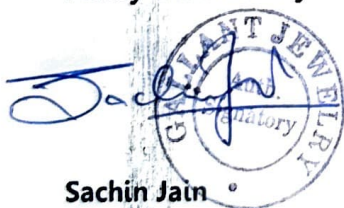
Mr. Sachin Jain & Mr. B.S. Shekhawat are responsible for implementing and reviewing this procedure.

Email: - hrd.gallant@gmail.com

Policy Review and Updates

This policy will be reviewed periodically, at least annually or as needed based on evolving RJC requirements, legal requirements or internal risk assessments, to ensure its continued effectiveness and relevance.

Policy Endorsed by



Sachin Jain

CEO

Date: - 01/01/2026

Place: - Jaipur

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