

BUSINESS PRINCIPLES DOCUMENT

Money Laundering, Terrorism Financing, Other Financial Offences / AML-CFT

- Samir Gems recognizes the fact that entities in the gems and jewellery sector have to take on the onus of analyzing their potential vulnerabilities to money laundering and implement specific steps that are required for protection against abuse by criminals.
- Strict compliance is ensured at all times, with all applicable national and, where appropriate, international laws / regulations with respect to money laundering, terrorism financing, bribery, facilitation payments, corruption, smuggling, embezzlement, fraud, racketeering, transfer pricing and tax evasion.
- Samir Gems shall act in accordance with national laws with respect to auditing of its financial accounts and maintaining internal controls as guided by various regulations.
- Compliance officer ensure all the critical steps such as KYC& KYS, Identification of suspicious transaction, reporting to management and record keeping as required by the local act and legislations are complied with.

Kimberley Process and System of Warranties

- Samir Gems is fully committed to complying with all the requirements specified in the Kimberley Process Certification Scheme and World Diamond Council's (WDC) System of Warranties Declaration.
- The definition of 'Conflict Gem Stone Diamonds' as agreed by the Kimberley Process has been adopted and declaration are received from suppliers and issued to all the customers
- We ensure KP compliance in all our trade of rough diamonds, which is audited by our internal audit team and by Financial Auditor and compliance certificate is issued by them
- Further for polished diamonds warranties In and Warranties out are checked by compliance team and audited by Financial Auditor and compliance certificate is issued by them

Anti Bribery and Facilitation Payment Policy

- Samir Gems shall ensure complete prohibition Bribery and facilitation payment across organization and in all the entities.
- Company will not offer, accept or countenance any payment, gift in kind, hospitality, expense or promises as such that may compromise promises of fair competition.

Disclosure of Treated Diamonds, Synthetics and Simulant

- The following essential principles will be applicable in all the transactions involving treated diamonds, synthetics and simulant
- Full disclosure i.e. the complete and total release of all available information about a Diamond and all material steps it has undergone prior to sale to the purchaser, irrespective of whether or not the information is specifically requested and regardless of the effect on the value of the diamond.
- No misuse of terminology or mis-representations or attempts to disguise the product will be made in the selling, advertising and distribution of treated diamonds, synthetics and simulant.
- The word 'diamond' will not be used in the case of names of firms, manufacturers or trademarks; in connection with treated diamonds or diamond simulant or synthetic diamonds. Necessary declaration as per CIBJO, WFDB & KPCS are provided on all invoices.

Supply Chain Management / Best Endeavours

- The management of Samir Gems is committed to taking appropriate action to use best endeavours to ensure the commitment of business partners and associated manufacturing units complies with the same.

- Annual circulation of Supply Chain Policy is done among all trade suppliers and customer.
- Samir Gems is committed to being a responsible corporate citizen and is opposed to human rights abuses. As part of that commitment, Samir Gems seeks to source products, components and materials from companies that share our values around human rights, ethics and environmental responsibility. Samir Gems shall communicate its policy to all the stakeholders and will ensure effective implementation among them.
- Suppliers to Samir Gems are expected to establish their own Supply Chain Policy, due diligence frameworks and management systems that are designed to prevent violations against human right, ethics and environmental responsibility. Samir Gems reserves the right to take appropriate actions, which may include discontinuing the business relationship with supplier if we determine any failure.

Employment

- Compliance is ensured at all times, with applicable national and, where appropriate, international laws / regulations with respect to employment and labour.
- The Company shall ensure that wages and benefits for a standard working week shall meet at least national minimum standards and shall be sufficient to meet the basic needs of workers and provide some discretionary income.
- Information regarding applicable employment policies and working practices has been communicated in a transparent manner to all employees

Health and Safety

Samir Gems recognizes the need to develop a sustainable, value creating business and is committed to the following:

- Any adverse impact of our business processes on those who carry it out shall be identified and eliminated. Towards this end, we will systematically review our operations to identify sources of health and safety related risks.
- This review will use appropriate standards as required by prevailing laws, expert opinion and our knowledge of best practices.
- The review will lead to formulation of clearly described work practices and drills.
- The health of our staff, exposed to certain hazardous processes, will be monitored periodically through appropriate medical checks, and reviewed using expert inputs for improvements.
- All workplaces will be constructed to meet safety standards with local regulations as the minimum standards that will be applicable.

Non Discrimination, Disciplinary Practices

- Any form of discrimination relating to the hiring, discharge, pay, promotion and training of employees on the basis of race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, HIV status, Migrant status, membership of worker representative bodies, political affiliations, or any criteria that are unlawful is strongly discouraged by the Company and any such reported incidents will be viewed as a serious violation of this Business Principles.
- Samir Gems will ensure that employees who have certain life threatening diseases or illnesses are not treated differently from other employees, and will continue to employ such personnel, as long as they are physically and mentally fit to attend to their normal job responsibilities.
- Samir Gems encourages all personnel to voice concerns promptly, if they have a genuine reason to believe that a policy, Company operation or practice is or will likely be in violation of any law, regulation or internal Company rule or policy, including this Business Principles.
- Samir Gems shall ensure all employees who come forward in good faith to report issues, that they will be treated fairly and respectfully.

Child Labour

- No form of child labour should be employed at any of the facilities of Samir Gems.

- As per our company policy no child labour or adolescent child labour will be employed
- Company will implement suitable policy and procedures to verify the age proof all of new joinee's.

Forced Labour

- The management of Samir Gems is fully committed to ensuring that forced or involuntary labour is not practiced in any form at any of its facilities. Any reported incidents relating to forced labour will be considered as a serious violation of this Business Principles.
- The following definitions will be applicable:
 - The Universal Declaration of Human Rights that states that 'No one shall be held in slavery or servitude'
 - ILO Convention 29, which defines forced or compulsory labour as 'all work or service which is extracted from any person under the menace of any penalty, and for which the said person has not offered himself voluntarily'

Human Rights

- All employees in the Company's facilities will be treated with equality, respect and dignity.
- Samir Gems will not interfere in the right of employees to Observe tenets practices based on caste, race, national origin, gender, religion or disability, union membership or political affiliation
- The Company strongly discourages any form of sexually coercive, threatening, abusive or exploitative behaviour.
- Any reported incidents relating to direct or indirect physical, sexual, racial, Religious, psychological, verbal, or any other form of harassment or abuse, or any other form of intimidation or degrading treatment will not be tolerated by the company.

Environment Protection

Samir Gems is committed to effective environmental management as one of its important corporate priorities, and will focus on the following initiatives:

- Compliance with all applicable environmental laws and regulations
- The impact of each of our operations on the environment will be systematically assessed for compliance with appropriately defined standards and reviewed periodically to mitigate or eliminate such impact.
- Measurement of environmental performance through auditing with employee accountability and reporting to senior management.

Product Security

Samir Gems is committed to provide safety of product throughout its supply chain by following precaution as mentioned below

- Each and every stage of product processing it is covered through blanket insurance
- Suitable safe guarding and storage is ensured at all stage with the help of safes
- All the manufacturing, sales and retailing units are guarded by security agency and monitored by close circuit cameras.

Synthetic Diamonds

Samir Gems is committed to fight against undisclosed synthetic diamonds. Following methodology has to be adopted for ensuring compliance to un disclosed synthetic Diamonds.

- Access to effective detection system
- Buying from trusted suppliers
- Factory controls in place and safety measure are to be implemented to control switchover of diamonds.
- Reporting of un-disclosure synthetics to supplier and interested parties whenever detected.

- Record the incidents of contamination reported and implement suitable corrective and preventive measures for effective controls.
- Classify contamination of points into different category (High, Medium & Low)
- Identify the policy, procedure and test mechanism to implement test mechanism in the organization.
- Necessary declaration of compliance is obtained from the supply chain and chain of assurance is passed on the customers by printing synthetic declarations on all our invoices. (WFDB)

Public Grievances

Samir Gems keeping in view of the increasing importance of redressal of

- public grievances, has introduced the common grievance cell to look in to matter of reporting fraud, non-compliance or violation of any Financial, non-financial offenses conducted by the company or its employees or its supplies
- You may raise the red-flags for Anti Money Laundering, Bribery, Facilitation, Ethical Sourcing(Precious Metals), Human Right issues or any other issues which can bring industry into disrepute,

Public Grievance Call Contact Details :

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