

Sanghavi Solitaire Inc.

ANNUAL BUSINESS RESPONSIBILITY & OECD COMPLIANCE REPORT FOR THE YEAR
2025

DATED: 31st March, 2026

ANNUAL REPORTING TEMPLATE (RJC TOOL KIT VERSION 5.0)

Company Name: Sanghavi Solitaire INC.

Date: 31st March, 2026

Reporting Period Financial Year 2025

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Step 1: Establish strong company management systems

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

- We have e-mailed the policy at company level for easy accesses to stakeholder.
- OECD and Best Practice Annual communication has been sent to all the active supplier.
- Awareness presentation on Ethical sourcing based on OECD guideline has been circulated.
- Detailed policy and procedure at entity Level has been established based on risk of CAHRA's is done.

1. B Structure internal management systems to support supply chain due diligence.

- Additional responsibility has been assigned to Compliance officer to look over the compliance of Ethical sourcing policy.
- All key employees involved in sourcing and procurement of diamonds & have been trained.
- List of Suppliers has been maintained along with status of their social and ethical compliance.
- Ongoing monitoring of each supplies and associated suppliers is carried out

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	<p>with the help of tools such as digital media, web search, review of supply documents, declaration and market intelligence etc.</p>
<p>1.C Establish a system of controls and transparency over the minerals supply chain.</p>	<ul style="list-style-type: none"> • Supplier information collection process started and to obtain CAHRA's information and Ethical sourcing compliance at supplier level. • Currently Artn Inc. 98% supply from low risk and balance 2% is from non-regular suppliers.
<p>1.D Strengthen company engagement with suppliers.</p>	<ul style="list-style-type: none"> • As mentioned above supplier questionnaire has been circulated and we are in the process of following up with them to obtained the filed information from them. • Further we are also obtaining the vital information about suppliers from social platforms and social compliance registration such as BPP & RJC etc. • We are in the process of compiling filled supplier questionnaire data, after analysis we will be formulate supplier engagement practices based on risk reported at each supplier level (if any)
<p>1.E Establish A Company-Level, Or Industry Wide, Grievance Mechanism As An Early Warning Risk-Awareness System.</p>	<ul style="list-style-type: none"> • We have established the grievance handling policy and procedure at company level, contact details of compliance head provided in our Group Social and Ethical policy emailed to our business suppliers.

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Step 2: Identify And Assess Risk In The Supply Chain	
Identify And Assess Risks In The Supply Chain And Assess Risks Of Adverse Impacts.	<ul style="list-style-type: none">• We have established the detailed policy and procedure for identification of risk at entity level.• We have appointed and trained compliance officer to oversee the financial and ethical sourcing compliances.• We have categorized supply chain in to 2 major segments that its Secondary supplier and Open market suppliers.• All suppliers are bifurcated in to this category and open market supplies are considered as potential risk for supplies from CAHRA's and thus step by step information are gathered from this category of supplier as mentioned in point 1.B & 1. C.
Step 3: Design And Implement A Strategy To Respond To Identified Risks (If Applicable)	
Report Findings Of The Supply Chain Risk Assessment To The Designated Senior Management Of The Company.	<ul style="list-style-type: none">• Ongoing monitoring of each suppliers is done by compliance officer to confirm it's free from Conflict, were required Red Flags are been raised for seeking additional information and closed after receiving such information to our satisfaction.• Compliance officer shall report all un-answered flags to local management and Group compliance officer.

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	<ul style="list-style-type: none">• In worst situation where information is half or not satisfactory management starts engagement practice and discussion and dialogue with suppliers is carried out to ensure full information in further business.
Devise And Adopt A Risk Management Plan.	<ul style="list-style-type: none">• We have formulated the risk management plans at group level considering individual entities position in supply chain and position of supplier in supply chain.• Compliance officer carries out monitoring of each and every business transaction and were required Red Flags are been raised and further steps are followed as mention above.• Brief of companies Risk Management Practices has been mentioned in communication of Business policy on our website.
Implement The Risk Management Plan And Monitor Performance Of Risk Mitigation Efforts.	<ul style="list-style-type: none">• Group level monitoring of Red Flags and its effective closure is monitored.• Compliance officer provides period status reports of OECD compliance to the management.
Internal Training	<ul style="list-style-type: none">• Compliance officer provides period training to all the concern employee involved in buying and selling And compliance monitoring team.
Communications	<ul style="list-style-type: none">• Business principle has been emailed to customers & suppliers.

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	<ul style="list-style-type: none">Over and above Annual communication on Business policy and Awareness on various best practices and expectation from business partners is Communicated
OPTIONAL INFORMATION ON Step 4: Carry Out Independent Third-Party Audit	
RJC COP Audit	<ul style="list-style-type: none">Recently our USA Trading office has finalized the RJC COP 2024 certification audit and same is scheduled in the month of April-May 2026. Final report will be available once audit completed
Grievances And Remediation	<ul style="list-style-type: none">No grievance of what so ever has been Reported till date.

Prepared By & Approved by:

Hema Patel



Compliance Officer

Date: 31st March, 2026