

**SANGHAVI SOLITAIRE INC**

**22 WEST 48<sup>TH</sup> ST #200**

**NEW YORK N.Y 10036**

**Supply Chain Policy**

This Policy shows Sanghavi Solitaire Inc. commitment and its expectations for its product suppliers regarding actions to address Conflict Minerals including Diamonds. The group reviews this policy annually. Sanghavi Solitaire Inc. expects its suppliers to have policies and due diligence measures that will enable us to reasonably assure that products and components supplied to us containing conflict free minerals and metals.

We, being a responsible business entity, support the goal of the Dodd-Frank Act of preventing armed groups in the conflict affected countries from benefitting from the sourcing of Conflict Minerals and metals from that region.

Sanghavi Solitaire Inc. is committed to working with its suppliers to educate them on these matters and concerning steps they can take to obtain increased transparency regarding the origin of minerals and metals contained in the products they manufacture and sell to Sanghavi Solitaire Inc.

Sanghavi Solitaire Inc. reserves the right to evaluate the extent to which a supplier has failed to reasonably comply with this Policy.

Sanghavi Solitaire Inc. reserves the right to request additional documentation from its suppliers regarding the origin of any Conflict Minerals included in any diamonds sold to Sanghavi Solitaire Inc. Suppliers who do not reasonably comply with this Policy shall be reviewed by Sanghavi Solitaire Inc. for future business.

**Policy – Sourcing**

Sanghavi Solitaire Inc. is committed to ensuring that our supply chain is free of any Diamond which was procured for the support or benefit of armed and anti-social conflict groups or involving serious abuses of human rights and non-compliant with OECD Guidelines.

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Sanghavi Solitaire Inc. clearly criticizes such activity and will reject any material which we believe was obtained involving serious human rights violations or which benefitted or supported armed rebels or terrorist groups through illegal finance or other activities.

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 Rights Violation; Torture, Cruel, In-Human and Degrading Treatment; Forced/Compulsory Labor; Child Labor; 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 carry out due diligence to assess risks related to procurement from the Conflict affected and high-risk areas – CAHRAs and shall always source from compliant miners/traders.

We shall always set reasonable efforts to source Diamonds from Conflict-Free Sources and require our direct and indirect suppliers to do the same; We strive to work supportively with our customers and supply chain partners in implementing conflict-free product compliance programs.

### **Policy – Due Diligence and Risk Assessment**

The company shall always undertake to ensure that the extraction and trade of Diamonds support peace and development and not conflict.

Sanghavi Solitaire Inc. remains committed to enhance its Supply Chain Due Diligence and risk assessment program through internal review and external assessments. We have zero tolerance policy for the supplier violating OECD due diligence guideline and we

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shall immediately stop commercial relationship if any of our business associates found non-compliant or High-Risk during our internal/external risk assessment.

Currently Sanghavi Solitaire Inc. procures its diamonds from suppliers involved in ethical business practice. However, we have established a strong due diligence process and we shall review it as an when we observe significant risk or upon receipt of any grievance or complaint but in normal course, we shall carry our due diligence process on annual basis.

### **RJC Compliance Policy**

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.

Sanghavi Solitaire Inc. is 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.

### **Grievance Mechanism**

Our employees, suppliers and other parties can report concerns and alleged violations of supply chain/sourcing/due diligence/Ethical Business policy/Financial Offence/Provenance claim as follows: Email: [nitin112@aol.com](mailto:nitin112@aol.com)

Reports can be made anonymously and will be kept confidential to the fullest extent practicable and allowed by law. We will not take any retaliatory action against our employees, suppliers, or other parties who make a report in good faith. Our suppliers are encouraged to contact Mr Nitin Jobanputra Tel No 212-764-7841 Email [nitin112@aol.com](mailto:nitin112@aol.com) if they wish to seek guidance on the application of this Policy.

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**Supply chain due diligence and Risk Assessment Report**

Sanghavi Solitaire Inc. has done the supply chain due diligence and risk assessment, Overall risk for all suppliers is low and they were found free from any business relationship with conflict affected and high-risk areas. Supplier risk assessment report available with compliance team.

Nitin Jobanputra

President