



Policy – Supply Chain

At Sheetal Group, we take Ethical business practice, social and environmental factors into consideration in making decisions on the procurement of Rough and polish diamonds, diamond studded jewellery with metals and coloured gemstone.

This Policy shows Sheetal's commitment and its expectations for its product suppliers regarding actions to address Conflict Diamonds. Sheetal Group expects its suppliers to have in place policies and due diligence measures that will enable us to reasonably assure that diamonds/jewellery with all metals and minerals supplied to us should be **conflict free** and not belong to Conflict-affected and high-risk areas – CAHRAs .

We being a responsible company, Sheetal Group supports the goal of the Dodd-Frank Act of preventing armed groups in the conflict affected and high-risk countries from benefitting from the sourcing of Conflict diamonds from that region.

Sheetal Group 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 diamonds mined or manufacture and sell to Sheetal Group.

Sheetal Group reserves the right to evaluate the extent to which a supplier has failed to reasonably comply with this Policy. Sheetal Group reserves the right to request additional documentation from its suppliers regarding the origin/source of diamonds sold to Sheetal Group.

Suppliers who do not reasonably comply with this Policy shall be reviewed by Sheetal Group for future business.

Policy – Sourcing

Sheetal Group is committed to ensuring that our supply chain is free of any diamonds, 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.

Sheetal Group 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 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 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 miners and traders validated as being Conflict Free and require their direct and indirect suppliers to do the same;

We strive to work supportively with our customers and supply chain partners in implementing conflict free compliance programs for Diamond Supply chain.

Policy – Due Diligence and Risk Assessment

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

Sheetal Group remains committed to enhance its Supply Chain Due Diligence program through internal review and external assessments. We have zero tolerance policy for the supplier violating OECD due diligence guidelines and we shall immediately stop commercial relationship if any of our business associates are found non-compliant or High-Risk during our internal/external risk assessment.

Currently Sheetal Group procure its diamonds from RJC CoP/Ethical business practice compliant miners/traders. 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. Sheetal Group has 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.

Grievance Mechanism

Our employees, suppliers and other parties can report concerns and alleged violations of supply chain/sourcing/due diligence policy as follows:

Email: reception.mumbai@sheetals.net Call: + 91-22-6181 5300

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 reception.mumbai@sheetals.net if they wish to seek guidance on the application of this Policy.

Date: 01/12/2021 (Mumbai)





Supplier Risk Assessment /Due Diligence Report – Publication (Detailed report is with Compliance team and may produce to concerned parties upon request)

Due Diligence Steps	Supplier Metals/Minerals	Supplier Traders	Customers
Step 1: Establish strong company management systems			
Supply chain policy	Yes	Yes	Yes
Management structure and responsibilities for due diligence programme	Yes	Yes	Yes
Record-keeping systems	Yes	Yes	Yes
Step 2: Identify and assess risk in the supply chain			
Assessment of supplier's due diligence practices	Yes	Yes	Yes
Methodology of company supply chain risk assessments	RJC CoP	RJC CoP/ BPP Compliant/ Declaration for ethical business practices	
Actual or potential risks identified	Low	Low	Low
Step 3: Design and implement a strategy to respond to identified risks (if applicable)			
Steps taken to manage risks, including involvement of affected stakeholders	NIL	NIL	NIL
Efforts made to monitor and track performance for risk mitigation	On Going	On Going	On Going
All instances of risk mitigation and results of follow-up after six months	NIL	NIL	NIL

Compliance team of Sheetal Group has completed the due diligence and Risk assessment of all its Diamond/Jewellery Suppliers including metals and minerals supplier with respect to latest BPP/RJC guidelines and we found all our suppliers are complying with requirements not found any risk pertaining to their business involvement in Conflict Affected and high risk Areas' (CAHR's).

Date: 01/12/2021 (Mumbai)

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