



CORPORATE BUSINESS ETHICAL POLICY

We at CENTUR GEMS are committed to achieve highest level of Ethical, Health Safety and Environment Standards.

BY ENSURING FOLLOWING ACTIONS.

- We ensure Kimberly process/SOW & Disclosure compliance in all our business of diamond.
- 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.
- CENTUR GEMS. is committed to fight against undisclosed synthetic diamonds.
- We declare that we do not deal in conflict diamonds and ensure to continue the same in future.
- Compliance is ensured at all times, with applicable national and, where appropriate, international laws / regulations with respect to employment and labour.
- We will never engage child labour and shall comply with applicable land law for the same.
- The management of CENTUR GEMS. is fully committed to ensuring that forced or involuntary labour is not practiced in any form at any of its facilities.
- We will not discriminate in engaging any employee and disciplinary actions if any shall be taken will be in accordance to local land law.
- Compliance with all applicable environmental laws and regulations.
- We ensure strict compliance of health and safety norms and shall adhere to applicable land law.

Conflict Minerals Policy Statement (Diamond & Gem Stone)

- CENTUR GEMS is committed to being a responsible corporate citizen and is opposed to human rights abuses. As part of that commitment, company seeks to source products, components and materials from companies that share our values around human rights, ethics and environmental responsibility.
- Company put all possible efforts to ensure that all its supply of diamonds is not originating from CAHRA's and where practically possible origin of diamonds is known to us.

What are "Conflict Diamonds"?

- Blood Diamonds, also known as "Conflict Diamonds," are stones that are produced in areas controlled by rebel forces that are opposed to internationally recognized governments. The rebels sell these diamonds, and the money is used to criminal activities and or funding terrorism.

Identified CAHRA'S Affected Diamond Producing Nations:

- Sierra Leone, Liberia, Angola, the Republic of Congo, Côte d'Ivoire, the Central African Republic, and the Democratic Republic of Congo.
- Company shall ensure that none of its supplies are coming from above source.
- Company will communicate its sourcing policy to all the stakeholders and will ensure effective implementation among them by taking appropriate steps such as supplier's engagement through awareness programs, meetings training etc.

Annual Ethical Diamond Sourcing Compliance Report

- Any customer willing to obtain the copy of our "Ethical diamond sourcing compliance report" will have to submit the email request to our compliance officer, which shall be reviewed internally and replied as per group public communication policy.



CENTUR GEMS

Public Grievances

- In current scenario of increasing importance of public grievances handling. Company has introduced the common public grievance cell to look in to matter of reporting non-compliance against any of the company policies or raising red flag against any of its business entity or individual involved in activities which will bring industry in disrepute shall communicate to below mentioned members.
- This also includes grievance and compliance mechanism for ethical sourcing and other financial offences.

Contact person Name: Mr. SUJAL SHAH (Partner)

Phone Number: +91-22-40056800/9820236194

Address: GE 5021 A, G- Tower, Bharat Diamond Bourse,
Bandra-Kurla Complex, Bandra - East, Mumbai -400051.

Email: info@centurgems.com

Website -: <http://www.centurgems.com/index1.html>



CENTUR GEMS

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Section A: General Information about the Company:

THE CENTUR GEMS DIFFERENCE

Established in the year 1976 in Mumbai, Centur Gems prides on being a business where determination, hard work, unerring quality and cost effectiveness have been the contributors towards sustained and steady growth over the past few decades. At Centur products are created as offerings to the pedestal of beauty and each of our priced offerings are a delight both for the beholder and the possessor.

The Centur Gems Group offers a plethora of over 350 tailor made assortments besides manufacturing 2 per carat to 50 per carat, rough diamonds size in all varieties. The Group has state-of-the-art manufacturing units located at Surat. Our production and manufacturing activities are predominantly carried out in-house at these factories, employing large number of skilled workers.

Section B: Financial compliance of the CENTUR GEMS:

2.1 Money Laundering, Terrorism Financing, Other Financial Offences

Current Status

- CENTUR GEMS recognizes the fact that entities in the gems and jewellery sector have to take on the onus of analysing 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 the entities and compliance officer has been appointed at entity level who in turn reports to CENTUR GEMS CFO on compliance status on annual basis.
- Know Your Counter Party and other compliance of Due Diligence is followed in line with OECD guidance.
- Ongoing monitoring is carried out along with all stakeholders.

Area of concern & Remedial Measures

- Nil As on Date.

2.2 Kimberley Process and System of Warranties



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- CENTUR GEMS is fully committed to complying with all the requirements specified in the Kimberley Process Certification Scheme of World Diamond Council's (WDC) System of Warranties Declaration.
- Day to day monitoring and compliance of SOW is done by entity compliance officer.
- CENTUR GEMS is committed towards conflict free sourcing and zero tolerance policy is followed at CENTUR GEMS level.

Area of concern & Remedial Measures

- Nil As on Date.

2.3 Anti-Bribery and Facilitation Payment Policy:

- The CENTUR GEMS shall ensure complete prohibition Bribery and facilitation payment across organization and in all the entities.
- CENTUR GEMS has published compliance team contact details on website to receive any grievance or complaints.

Area of concern & Remedial Measures

- Nil As on Date.

2.4 Ethical Sourcing of Loose Diamonds Policy:

- Our company is concerned about the environment and social impacts of irresponsible mining.
- CENTUR GEMS has identified the risk of supply chain with respect to Conflict Affected High Risk Area.
- CENTUR GEMS ensure all its supplies are screened for conflict free supplies.
- We have published the OECD based ethical sourcing policy and we are communicating our policies to all the supply chain partners and pushing them to adopt the same.

Area of concern & Remedial Measures

- Current concern is lack of awareness about OECD regulation and requirements of sourcing.



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- We have started creating awareness about our Ethical sourcing requirements for our supply chain.
- We started Engagement with our global supply chain for obtaining the further supply chain information to ensure ethical and conflict free sourcing in metal business.

2.5 Social Compliance

- We ensure full compliance with all applicable national and, where appropriate, international laws / regulations with respect to employment and labour codes in all our establishment.
- We respect all regulation for child labour, forced labour, non-discrimination, non-retaliation etc.
- All work man rights are respected and adhere to freedom of association and collective bargaining regulations.

Area of concern & Remedial Measures

- No point has been reported in the social compliance of the CENTUR GEMS were remedial measures at CENTUR GEMS level is required.
- Entity level remedial measures are taken based on internal and external audits conducted by reputed agencies.

2.6 Health and Safety

- We at CENTUR GEMS are concern about the health and safety of employees and are constantly studding about any adverse impact of our business processes are 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.
- All our staff will be trained in the manner required to adhere to these work practices and drills.
- The health of our staff, exposed to certain hazardous processes, is be monitored periodically through appropriate medical checks, and reviewed using expert inputs for improvements.



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- All workplaces are constructed to meet safety standards with local regulations as the minimum standards that will be applicable.

Area of concern & Remedial Measures

- Nil as on date, as no accidents are reported in last one year.
- Organization has been blessed and we did not have any fire or any other incidents leading to dangerous circumstances.

2.7 Human Rights

- CENTUR GEMS is not and will not interfere in the right of employees to observe tenets or practices based on caste, race, national origin, gender, religion, 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.
- CENTUR GEMS ensures that none of its suppliers and stake holder have engaged in any activity which can violate the Human Right Principles.
- We have carried out the Human Right Due Diligence of suppliers and other Stake holders & based on risk assessment where necessary.

Area of concern & Remedial Measures

- No Area of concern & Remedial Measures has been raised in the Human right for any of our operating units.
- Supplier's further upstream compliance with respect to Human Right compliance for conflict free sourcing is a new development, where company is heading and would require more focus on the same.

2.8 Environment Protection

- CENTUR GEMS is Complying with all applicable environmental laws and regulations.



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- The impact of each of our operations on the environment are studied systematically and assessed for compliance with appropriately defined standards and reviewed periodically to mitigate or eliminate such impact.
- Disposal procedures for waste generated are followed in line with the applicable national and international regulations.
 - Improvement is seen employee's environmental awareness and performance with the help of detailed policies and procedures, training, and recognition of excellence.

Area of concern & Remedial Measures

- Emerging need for sustainable growth and responsible manufacturing is the area for improvements and management has suggested step by step approach to grow in these directions.



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ANNUAL REPORTING TEMPLATE (RJC TOOL KIT VERSION 5.0=)

Company Name:	CENTUR GEMS
Date:	22 nd November, 2023
Reporting Period:	Financial Year 2022-23

Step 1: Establish strong company management systems

<p>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</p>	<ul style="list-style-type: none"> • We have published the policy at company level for easy accesses to stakeholder. • OECD and Best Practice Annual communication has been sent to all the active customers and 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.
<p>1.B Structure internal management systems to support supply chain due diligence.</p>	<ul style="list-style-type: none"> • 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 precious metals have been trained on our Ethical precious metal sourcing policy. Refresher trainings are provided. • List of Suppliers has been maintained along with status of their social and ethical compliance



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	<ul style="list-style-type: none">• On going monitoring of each supply and associated suppliers is carried out with the help of tools such as digital media, web search, review of supply documents, declaration and market intelligence etc.
1.C Establish a system of controls and transparency over the minerals supply chain.	<ul style="list-style-type: none">• Supplier upstream information collection process started to obtained CAHRA's information and Ethical sourcing compliance at supplier level.
1.D Strengthen company engagement with suppliers.	<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 Signet SRSP, Approved ASM programs 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)
1.E Establish A Company-Level, Or Industry Wide, Grievance Mechanism as An Early Warning Risk-Awareness System.	<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



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	Social and Ethical policy on our Web site under Business Principal Section (which is publicly available)
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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. • Each entity has 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.
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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 supply is done by compliance officer to confirm its free from Conflict, were required Red Flags are been raised for seeking additional information and closed after receiving such information to our
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	<p>satisfaction.</p> <ul style="list-style-type: none">• Entity level compliance officer shall report all un-answered flags to local management and Group compliance officer.• 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 entity level considering individual entities position in supply chain and position of supplier in supply chain.• Entity 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 is 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">• Entity level and group level monitoring of Red Flags and its effective closure is monitored.• Compliance officer provides period



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	status reports of OECD compliance to the management.
Internal Training	<ul style="list-style-type: none">Each entity of the Group 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 published on the website covering all the COP wise policy including Ethical Precious Metal sourcing policy of the group.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 office has finalised the RJC COP 2019 re-certification audit
Grievances And Remediation	<ul style="list-style-type: none">No grievance of what so ever has been reported till date.

Prepared By & Approved by: Mr. Sujal Shah

Date: 22nd November, 2023