1.1 Legislation and Regulations

a. ANERI JEWELS LLC shall operate in compliance with all relevant national and international legislations / regulations as applicable in the countries which we operate.

b. All personnel are expected and directed to comply with all applicable laws and regulations as well as all internal ANERI JEWELS LLC rules and policies relating to their business activities.

c. It is the responsibility of personnel to know and understand legal, regulatory, and internal requirements as they apply to their jobs.

d. Our compliance team maintains the list of applicable legal and regulatory requirements and same is followed for compliance on day-to-day basis. Necessary records of requirements and its compliance is maintained.

1.2 Money Laundering, Terrorism Financing, Other Financial Offences

a. ANERI JEWELS LLC recognizes the fact that entities in the gems and jewelry sector must 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.

b. ANERI JEWELS LLC shall act in accordance with national laws with respect to review of its financial accounts and maintaining internal controls as guided by various regulations. Following acts and international guidelines is considered while establishing company level policies:

- US Patriot Act
- FATF 40 Recommendations and 8 special recommendations

c. It is the responsibility of concerned personnel to know and understand the relevant money laundering / financial offences related legal, regulatory, and internal requirements as they apply to their jobs. Ignoring or not reporting suspicious activity that appears to be questionable may also be considered as a violation of the Business Principles, depending on the seriousness of the non-conformance.

d. Compliance officers 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.

e. Compliance officer carries out periodic review of AML/CFT compliances and submits their report to management on Quarterly basis.

1.3 Kimberley Process and System of Warranties

a. ANERI JEWELS LLC is dealing in polished diamonds Studded Jewelry and fully committed to complying with all the requirements specified in World Diamond Council's (WDC) System of Warranties Declaration.

b. We will not engage in business with the supply chain who deal in 'conflict diamonds' or are not following the System of Warranties Declaration in invoices, either knowingly or unknowingly, and will be considered as a violation of the Business Principles.

1.4 Anti-Bribery and Facilitation Payment Policy:

a. ANERI JEWELS LLC shall ensure complete prohibition of Bribery and facilitation payment across organization and in all the entities.

b. ANERI JEWELS LLC will not offer, accept or countenance any payment, gift in kind, hospitality, expense or promises as such that may compromise promises of fair competition.

c. Entity shall prohibit bribery and facilitation payment and shall comply with various rules and the local land law.

1.5 Disclosure of Treated Diamonds, Synthetics and Stimulant

The following essential principles will be applicable in all the transactions involving treated diamonds, synthetics and stimulant.

- 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.
- We deal in natural diamonds only and any treatment on natural diamonds is disclosed to customer prior to sales.

1.6 Diamond & Gemstone Sourcing Policy as per OECD

Conflict Minerals Policy Statement (Diamond & Gem Stone)

ANERI JEWELS LLC is committed to being a responsible corporate citizen and is opposed to human rights abuses. As part of that commitment, ANERI JEWELS LLC seeks to source products, components and materials from companies that share our

values around human rights, ethics and environmental responsibility.

Aneri Jewels LLC ensures that none of its supplies come from the aforesaid countries/regions. Aneri Jewels LLC shall communicate its sourcing policy to all its stakeholders and will ensure effective implementation of its policy amongst all its entities.

Aneri Jewels LLC shall ensure that none of its supplies come from CAHRA Region sources. For More Details of CAHRA's refer to list of country under the regulation of EU 2017 https://www.cahraslist.net/cahras

1.7 Gold, Silver& Platinum Group Of Metal Sourcing Policy

Our Company is concerned about environment and social impacts of irresponsible mining.

We at ANERI JEWELS LLC shall ensure that all our gold Jewelry suppliers are following ethical precious metal Jewelry souring guidelines (Dodd- Frank rules, DRC & other applicable legislation).

Further, we are committed to ensure that sourcing of gold and precious metal products and articles thereof, are under the highest Social, Human right and Environmental standard cautions of trade.

1.8 Supply Chain Management / Best Endeavours

The management of ANERI JEWELS LLC is committed to take appropriate action to use best endeavours to ensure that the suppliers and contractors are committed for compliance to International Social Standards such as Responsible Jewellery Council (RJC).

1.9 Employment

a. Compliance is required at all times, with applicable national and, where appropriate, international laws / regulations with respect to employment and labor regulations.
b. The ANERI JEWELS LLC shall not require Staff to work for more than the national limit of hours in a week on a regular basis.
c. The ANERI JEWELS LLC shall ensure that wages and benefits for a standard working week shall meet at least national minimum standards.

1.10 Health and Safety

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

1.11 Non Discrimination, Disciplinary Practices

a. Discrimination can mean distinction, exclusion or preference.

b. 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 ANERI JEWELS LLC any such reported incidents will be viewed as a serious violation of this Business Principles.

c. We shall at no time condone the use of corporal punishment or other forms of mental or physical coercion.

d. We encourage all personnel to voice concerns promptly, if they have a genuine reason to believe that a policy, ANERI JEWELS LLC operation or practice is or will likely be in violation of any law, regulation or internal rule or policy, including this Business Principles.

1.12 Child Labour

a. No form of child labour should be employed at any of the facilities of the ANERI JEWELS LLC unless local laws stipulate a higher age, the minimum age for employment would be 18 year.

b. As per our ANERI JEWELS LLC policy no child labour or adolescent child labour will be employed.

c. ANERI JEWELS LLC will implement suitable policy and procedures to verify the age proof

all new employees joining the organization.

1.13 Forced Labour

a. The management of ANERI JEWELS LLC 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.

b. 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 they said person has not offered himself voluntarily".

1.14 Human Rights

- All employees in the ANERI JEWELS LLC' will be treated with equality, respect and dignity.
- ANERI JEWELS LLC 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 ANERI JEWELS LLC strongly discourages any form of sexually coercive, threatening, abusive or exploitative behavior.

1.15 Environment Protection

ANERI JEWELS LLC 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.
- Improvement of employee & suppliers environmental awareness and performance through detailed policies and procedures, training, and recognition of excellence.

1.16 Product Security

ANERI JEWELS LLC 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 our block & umbrella insurance policies
- Suitable safe guarding and storage is ensured at all stage with the help of safes
- We are taking at most care to ensure safety of visitors, Customers and interested parties, suitable arrangements such as CCTV, Multilevel entry doors and other electronic intelligence.
- All the concern persons are trained on relevant safety and security procedures to be followed at all time.

Public Grievances against social & Ethical compliance of the ANERI JEWELS LLC.

If you come across any instance of non-compliance or specific deviation from our ethical policy, please feel free to reach us.

Further in case if you are interested to obtained the copy of our sourcing annual compliance report based on OECD guidelines. Please send an email communication to below mentioned email address.

Sr No.	Mode	Details
(i)	Public Relationship Officer	Mr. Mahipal Singhvi
(ii)	By Email	mahipal@anerijewels.com
(iii)	Courier or mailer at Office address.	592 5TH AVENUE, 4TH FLOOR, NEW YORK, NY 10036.

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