

## Supply Chain Policy

Navrattan Enterprises, G-1/12, EPIP, Sitapura Industrial Area, Jaipur-302022 is a Jewellery Manufacturing company confirm this policy commitment to respect human rights, avoid contributing to the finance of conflict and comply with all relevant UN sanctions, resolutions and laws.

### Responsibility

Mr. Gaurav Agarwal himself is responsible to implement this policy throughout supply chain.

Mr. Vishal Agarwal is regular monitor this policy & maintained good relationship with all suppliers.

### Procedure: -

Navrattan Enterprises is a certified member of the Responsible Jewellery Council (RJC), As such we commit to proving, through independent third-party verification: -

- a) Respect human rights according to the Universal Declaration of Human Rights and International Labour Organization
- b) Respect declaration on Fundamental Principles and Rights at Work;
- c) Do not engage in or tolerate bribery, corruption, money laundering or finance of terrorism;
- d) Support transparency of government payments and rights-compatible security forces in the extractives industry;
- e) Do not provide direct or indirect support to illegal armed groups;
- f) Enable stakeholders to voice concerns about the jewellery supply chain; and
- g) are implementing the OECD five-step framework as a management process for risk-based due diligence for responsible supply chains of minerals from conflict-affected and high-risk areas.
- h) We also commit to using our influence to prevent abuses by others.

### Regarding serious abuses associated with the extraction, transport or trade of Minerals (Gold, Silver, Diamonds & gemstones)

We will neither tolerate nor profit from, contribute to, assist or facilitate the commission of:

- a. torture, cruel, inhuman and degrading treatment;
- b. forced or compulsory labour;
- c. the worst forms of child labour;
- d. human rights violations and abuses; or

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- e. war crimes, violations of international humanitarian law, crimes against humanity or genocide.

We will immediately stop engaging with upstream or downstream suppliers if we find a reasonable risk that they are committing abuses or are sourcing from, or linked to, any party committing these abuses.

#### **Regarding direct or indirect support to non-state armed groups:**

- a) We will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates who illegally:
- b) control mine sites, transportation routes, points where gemstone is traded and upstream actors in the supply chain; or tax or extort money at mine sites, along transportation routes or at points where gemstones is traded, or from intermediaries, export companies or international traders.
- c) We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are sourcing from, or are linked to, any party providing direct or indirect support to non-state armed groups.

#### **Regarding public or private security forces:**

- a) We affirm that the role of public or private security forces is to provide security to workers, facilities, equipment and property in accordance with the rule of law, including law that guarantees human rights. We will not provide direct or indirect support to public or private security forces that commit abuses.

#### **Regarding money laundering:**

- a) We will support efforts, or take steps, to contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers.

#### **Regarding bribery and fraudulent misrepresentation of the origin of minerals:**

- a) We will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export

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## Red flag circumstances:

Anomalies or unusual circumstances are identified through the information collected in Step 1 which give rise to a reasonable suspicion that the gold/silver/diamond may contribute to conflict or serious abuses associated with the extraction, transport or trade of gold/silver/diamond.

## Red flags identified or information unknown:

Any gold/silver/diamond producer that identifies a red flag in gold/silver/diamond supply chain, or is unable to reasonably exclude one or more of these red flags from gold/silver/diamond supply chain, should proceed to risk assessment.

This Policy will be monitored, at least once a year, through a review of the RJC system with senior managers and middle managers to identify potential gaps between the planning policy and the actual company practices, and the minutes of the meeting.

The compliance officer Mr. Vishal Agarwal shall be responsible for implementing and reviewing this procedure. Any Violation in supply chain can be raised by interested parties via email to:

[vishal@navrattan.in](mailto:vishal@navrattan.in)

Signed/ Endorsed by

Date of effect: - 01/04/2022

for Navrattan Enterprise

  
Partner