Gemological Science INTERNATIONAL
Leading the way with Integrity & Innovation

Section A: General Information about the Company:

Gemological Science International (GSI) was founded in 2005 in New York. This makes GSI the only major gemological organization established in the 21st century. GSI is a global company, with locations across four continents.

GSI is one of the largest gemological laboratories in the world by volume of goods we analyse. We set ourselves apart by leading the way with diamond and gemstone analysis and research.

Section B: Ethical Compliance of Gemological Science International Pvt. Ltd.:

1.1 Legislation and Regulations

a. GEMOLOGICAL SCIENCE INTERNATIONAL PVT. LTD. shall operate in compliance with relevant national and international legislations / regulations as applicable in the countries in which they operate.

b. All employees are expected and directed to comply with all applicable laws and regulations as well as will have to follow the rules and regulation formed by GEMOLOGICAL SCIENCE INTERNATIONAL PVT. LTD. regarding its business policies

c. 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. GEMOLOGICAL SCIENCE INTERNATIONAL PVT. LTD. recognizes the fact that entities in the gems and jewellery sector have to take on the onus of analyzing their potential vulnerabilities to money laundering and implement specific steps that are required for protection against abuse by criminals.

b. Strict compliance is required 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.

c. GEMOLOGICAL SCIENCE INTERNATIONAL PVT. LTD. shall act in accordance with national laws with respect to auditing of its financial accounts and maintaining internal controls as guided by various regulations. Following acts and international guidelines is considered while establishing policies of the GEMOLOGICAL SCIENCE INTERNATIONAL PVT. LTD.

- Prevention of Money laundering Act 2002
- FATF 40 Recommendations and 8 special recommendations

d. 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.

e. Compliance officer ensure all the critical steps such as KYC (know your counter party) Identification of suspicious transaction, reporting to management and record keeping as required by the local act and legislations are complied with.

f. Compliance officer caries out periodic review of AML/CFT compliances and submits his report to management on Quarterly basis.

1.3 Anti-Bribery and Facilitation Payment Policy:

a. The GEMOLOGICAL SCIENCE INTERNATIONAL PVT. LTD. shall ensure complete prohibition of Bribery and facilitation payment across organization and in all the entities.

b. GEMOLOGICAL SCIENCE INTERNATIONAL PVT. LTD. 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 regulations of the land.

1.4 Supply Chain Management / Best Endeavors

The management of GEMOLOGICAL SCIENCE INTERNATIONAL PVT. LTD. is committed to take appropriate action to use best endeavors to ensure that the suppliers and contractors are committed for compliance to International Social Standards.

Annual communications are exchanged with all the supply chain to spread awareness.

1.5 Employment

a. Compliance is required at all times, with applicable national and, where appropriate, international laws / regulations with respect to employment and labour.

b. The GEMOLOGICAL SCIENCE INTERNATIONAL PVT. LTD. shall not require Staff to work for more than the national limit of hours in a week on a regular basis.

c. The GEMOLOGICAL SCIENCE INTERNATIONAL PVT. LTD. shall ensure that wages and benefits for a standard working week shall meet at least national minimum standards and shall be sufficient to meet the basic needs of Staff and provide some discretionary income.

1.6 Health and Safety

a. GEMOLOGICAL SCIENCE INTERNATIONAL PVT. LTD. recognizes the need to develop a sustainable, value creating business and is committed to the following:

b. 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.

c. This review will use appropriate standards as required by prevailing laws, expert opinion and our knowledge of best practices.

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

1.7 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 GEMOLOGICAL SCIENCE INTERNATIONAL PVT. LTD. and any such reported incidents will be viewed as a serious violation of this Business Principles.

c. We will ensure that employees who have certain life-threatening diseases or illnesses are not treated differently from other employees, and will continue to employ such personnel, as long as they are physically and mentally fit to attend to their normal job responsibilities.

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

e. We encourage all personnel to voice concerns promptly, if they have a genuine reason to believe that a policy, GEMOLOGICAL SCIENCE INTERNATIONAL PVT. LTD. operation or practice is or will likely be in violation of any law, regulation or internal GEMOLOGICAL SCIENCE INTERNATIONAL PVT. LTD. rule or policy, including this Business Principles. GEMOLOGICAL SCIENCE INTERNATIONAL PVT. LTD. assures all employees who come forward in good faith to report issues, that they will be treated fairly and respectfully.

1.8 Child Labour

a. No form of child labour should be employed at any of the facilities of the GEMOLOGICAL SCIENCE INTERNATIONAL PVT. LTD. Unless local laws stipulate a higher age, the minimum age for employment that will be applicable is fifteen (As per ILO Convention No. 138).

b. For authorized adolescents (persons below 18 years of age but above 15 years), the

GEMOLOGICAL SCIENCE INTERNATIONAL PVT. LTD. management is responsible for providing working conditions, hours of work and wages in compliance with applicable local laws as a minimum.

c. As per our GEMOLOGICAL SCIENCE INTERNATIONAL PVT. LTD. policy no child labour or adolescent child labour will be employed.

d. GEMOLOGICAL SCIENCE INTERNATIONAL PVT. LTD. will implement suitable policy and procedures to verify the age proof all new employees joining the organization.

1.9 Forced Labour

a. The management of GEMOLOGICAL SCIENCE INTERNATIONAL PVT. LTD. 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"

1.10 Human Rights

a. All employees in the GEMOLOGICAL SCIENCE INTERNATIONAL PVT. LTD.' facilities will be treated with equality, respect and dignity.

b. GEMOLOGICAL SCIENCE INTERNATIONAL PVT. LTD. 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

c. The GEMOLOGICAL SCIENCE INTERNATIONAL PVT. LTD. strongly discourages any form of sexually coercive, threatening, abusive or exploitative behavior.

d. 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 GEMOLOGICAL SCIENCE INTERNATIONAL PVT. LTD.

e. HSE & Anti sexual harassment committees are formed and committee shall review the compliance at regular intervals by holding review meetings.

1.11 Environment Protection

GEMOLOGICAL SCIENCE INTERNATIONAL PVT. LTD. is committed to conducting its business in an environmentally responsible manner and complying with all applicable environmental laws and regulations.

The Company strives to minimize environmental impacts through the efficient use of resources, reduction of waste, responsible disposal practices, pollution prevention, and promotion of environmental awareness among employees. Environmental performance shall be reviewed periodically, and opportunities for continual improvement shall be pursued.

a. Environmental Management Systems: Organization maintains environmental controls and procedures to manage resource use, emissions, and waste in line with applicable legal and RJC COP 2024 requirements.
b. Legal Compliance: As an organization, there are currently no specific environmental legal compliance requirements applicable to our operations, except for provisions under pollution control regulations, where applicable. As part of our commitment to good governance and sustainable practices, we maintain records of electricity consumption. These records are reviewed periodically to monitor energy usage and identify opportunities for efficient energy utilization and conservation.
c. Water Stewardship: As an organization, there are currently no specific environmental legal compliance requirements applicable to our operations, except for provisions under pollution control regulations for water privation, where applicable. As part of our commitment to good governance and sustainable practices, we maintain records of water consumptions.
d. Climate & Energy Management – GHG Measurement: Greenhouse gas (GHG) emissions from Scope 1 & Scope 2 are calculated and monitored periodically in line with recognized methodologies. The company carbon footprint as of December 31st 2025 has been calculated. Management is currently reviewing the baseline study and sustainability and ESG report available on request.
e. Climate Action & Continuous Improvement: Emission reduction targets and energy-efficiency initiatives are identified based on GHG assessments to support continuous improvement over time.

1.12 Product Security

GEMOLOGICAL SCIENCE INTERNATIONAL PVT. LTD. is committed to provide safety of product throughout its supply chain by following precaution as mentioned below

a. Each and every stage of product processing it is covered through blanket insurance
b. Suitable safe guarding and storage is ensured at all stage with the help of safes
c. We are taking at most care to ensure safety of visitors, Customers and interested parties, suitable arrangements such as CCTV, Multi-level entry doors and other electronic intelligence.
d. All the concern persons are trained on relevant safety and security procedures to be followed at all time.

1.13 WHISTLEBLOWER PROTECTION – SCOPE & COVERAGE

e. This Whistle blower Protection mechanism is established to enable employees, contract workers, suppliers, and other relevant stakeholders to safely raise concerns related to actual or suspected misconduct or non-compliance. The scope of reportable concerns includes, but is not limited to, breaches of AML/CFT laws and regulations, as well as social, labour, and human rights standards, and health, safety, and environmental (HSE) obligations. This mechanism supports ethical conduct, transparency, and responsible business practices across the designed to align with applicable legal, regulatory, and industry-specific expectations.

f. Any grievance or whistleblowing can be done using multiple ways such as phone call to compliance officer, email, meeting in personal and using other communication techniques, contact details of compliance officers are published.

1.14 Supply Chain Grievances and Whistleblowing Policy

g. Gemological Science International Pvt. Ltd. Grievance Procedures have been established and available for all employees to raise any issue/grievance for work culture, discipline, practices and supply chain concerns.

h. If any Grievance from a customer and/or supply chain partner has been reported, relating to any actual, alleged or suspected breach of this Policy, this matter should be raised in accordance with Supply Chain Grievance Policy.

i. The Relevant Worker responsible for the relationship with the Supplier must communicate to the Supplier about the receipt of the complaint and issue a summary report on the conclusion of the investigation.

j. It is required that the Supplier's staff have been informed of our supply chain grievance policy and it is available to them as well and can be used by them as a way of raising any concerns.

k. With respect to breaches, by any party in the Supply Chain Policy Commitments and/or in the Supplier Code of Conduct, the breach will be reported to senior management and based on an investigation report, necessary actions shall if needed be taken.

The Top Management and Marketing team to deal with Grievances, concerns and complaints submitted by the employees, clients, customers, and other affected end user and stakeholders.

A written objection to the business operation resolution issued concerning the employees, clients, customers, and other affected end-user and stakeholders. Which is submitted by him/her to remove the injustice or wrongdoing he/she claims to have been witnessed or inflicted.

The Objectives of the Grievances:

1. Ensures that materials acquired and services provided are obtained with adherence to human rights, labor, environmental and highest business ethics.

2. Ensures to achieve justice, employment satisfaction and the stability of the legal status of the employees.
3. Ensures that business activities meet the international market ethics and standard.
4. Ensures that business operates in accordance with Testing & Grading of the product

Grounds for the Grievance and Procedure for submission:

1. Human rights violations; force and child labor, torture, serious abuses, etc.
2. Contravention of the law, regulations or by-laws
3. Accounts and financial Manipulation
4. Fraud, bribery, corruption and solicitation
5. Falsification of documents
6. Tolerates law and regulation violators and supporter of non-state armed group and all forms of criminal activities.
7. Employee misconduct and labor practices.
8. Health and safety; working conditions.

We encourage all to submit reports along with solid proof of documents and provide as much information as possible for the investigation. Reports may submit to the following email address: bina.vaity@gemscience.net

Confidentiality:

Committee will guarantee with the outmost capability of Gemological Science International Pvt. Ltd. to keep the identity of the concern person confidential with respect to all events. Documents and files, they view and all information that comes from their knowledge will solely be used for the purpose of investigating illegal activities or non-compliance allegations to Gemological Science International Pvt. Ltd. policies.

Escalation Procedure and Timeline for Grievances and Whistleblowing

1. Submission of Grievance

- Responsible Party: Complainant (employee, client, customer, stakeholder, or end-user)
- Method: Submission via email
- Content Required:
  - Full details of the grievance or complaint
  - Supporting documentation and evidence (if available)

- `Name and contact information (optional for anonymous reporting)

- Timeline: At any time
- Confidentiality: Full confidentiality guaranteed by Gemological Science International Pvt. Ltd.

2. Acknowledgement of Receipt

- Responsible Party: Compliance Officer
- Action: Issue written acknowledgment of grievance receipt
- Timeline: Within 3 working days of submission

3. Preliminary Review and Risk Assessment

- Responsible Party: Grievances and Complaints Committee
- Actions:
  - Assess completeness of submission
  - Evaluate urgency and severity
  - Determine if the issue falls under Committee jurisdiction
- Timeline: Within 7 working days from acknowledgment

4. Initiation of Investigation

- Responsible Party: Assigned Investigators (from Compliance or Legal Dept.)
- Action:
  - Conduct internal investigation
  - Request clarifications or additional documents (if needed)
  - Interview relevant parties (when applicable)
- Timeline: Investigation must be initiated within 10 working days from the preliminary review
- Duration: Completed within 20 working days, unless extended due to complexity

5. Escalation (if necessary)

If the issue cannot be resolved internally or requires higher authority or external reporting:

- Escalation to:

  - Senior Management.
  - External Auditor (if legally required or high-risk breach)
- Timeline for escalation decision: Within 5 working days of investigation conclusion

6. Issuing Final Decision and Corrective Actions

- Responsible Party: Grievances and Complaints Committee
- Action:
  - Issue a reasoned written decision
  - Recommend corrective or disciplinary actions
  - Notify the complainant (unless anonymous)
  - Update internal risk management systems
- Timeline: Within 10 working days from conclusion of investigation

7. Follow-Up and Monitoring

- Responsible Party: Compliance Officer
- Action:
  - Ensure implementation of corrective measures
  - Monitor resolution progress
  - Re-assess for recurrence risk
- Timeline: Periodic check-ins at 30, 60, and 90 days after decision

8. Recordkeeping and Reporting

- Responsible Party: Compliance Department
- Action:
  - Securely store grievance records
  - Report summary of grievances and actions to senior management quarterly

Include anonymized data in annual compliance reports

Public Grievances against social & Ethical compliance of the Gemological Science International Pvt. Ltd.

If you come across any instance of non-compliance or deviation from our Ethical Policy, please feel free to contact us.

Stakeholders who wish to obtain a copy of our annual social & Ethical compliance report RJC COP Guidelines may send a request to the email address provided below.

For any queries, concerns, or report requests, please contact us:

Sr No.	Mode	Details
(i)	By hand	Ms. Bina Vaity
(ii)	By Email	bina.vaity@gemscience.net

Prepared by: Compliance Officer

Approved by: Director / Top Management

Date:15.09.2026