

A) Legislation and Regulations

- a. Bathwick shall operate in compliance with relevant national and international legislations / regulations as applicable in the countries in which they operate.
- b. 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 at entity level.

B) Money Laundering, Terrorism Financing, Other Financial Offences

- a. Bathwick recognizes the fact that entities in the gems and jewelry 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 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.
- c. Bathwick shall act in accordance with national laws with respect to auditing of its financial accounts and maintaining internal controls as guided by various regulations.
- d. Compliance officer shall ensure all the critical steps such as Know your counter party, Identification of suspicious transaction, reporting to management, training & awareness and record keeping as required by the local act and legislations are complied with.

C) Kimberley Process and System of Warranties

- a. Bathwick is fully committed to complying with all the requirements specified in the Kimberley Process Certification Scheme and World Diamond Council's (WDC) System of Warranties Declaration.
- b. The definition of 'Conflict Gem Stone Diamonds' as agreed by the Kimberley Process will be adopted i.e.

"Rough diamonds used by rebel movements or their allies to finance conflict aimed at undermining legitimate Governments, as described in relevant United Nations Security Council (UNSC) resolutions in so far as they remain in effect, or in other similar UNSC resolutions which may be adopted in the future, and as understood and recognized in United Nations General Assembly (UNGA) Resolution 55/56, or in other similar UNGA resolutions which may be adopted in the future."

- c. Wherever applicable, the following affirmative statement as recommended by the World Diamond Council's System of Warranties should be printed on all the invoices:

"The diamonds herein invoiced have been purchased from legitimate sources not involved in funding conflict, in compliance with United Nations Resolutions and corresponding national laws. The seller hereby guarantees that these diamonds are conflict free and confirms adherence to the WDC SOW Guidelines."

D) Anti Bribery and Facilitation Payment Policy:

- a. The Bathwick shall ensure complete prohibition Bribery and facilitation payment across organization and in all the entities.
- b. Company 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.
- d. Employees are encourage reporting such instance and report and shall be protected against all possible threats arising out of these situations.

E) Disclosure of Treated Diamonds, Synthetics and Stimulants

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.
- No misuse of terminology or mis-representations or attempts to disguise the product will be made in the selling, advertising and distribution of treated diamonds, synthetics and stimulant.
- All necessary declaration as per WFDB, SOW & CIBJO are provided on sales invoices and annual compliance of supply chain shall be reviewed on ongoing basis.

F) Diamond Sourcing Policy

Conflict Minerals Policy Statement (Diamond & Gem Stone)

Bathwick is committed to being a responsible corporate citizen and is opposed to human rights abuses.

Bathwick shall strive to ensure that all its supply of diamonds are not originating from CHARA'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 : (Star gems Group Prohibit Sourcing from below mention region)

Sierra Leone, Liberia, Angola, the Republic of Congo, Côte d'Ivoire, the Central African Republic, and the Democratic Republic of Congo.

1. Company shall communicate conflict mineral sourcing policy.
2. Company shall engage with stakeholder for ethical sourcing.
3. Company shall work with suppliers to ensure conflict free supply chain.

G) Gold Sourcing

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

We at Bathwick shall ensure ethical compliance of gold sourcing as and when sourcing to our business.

H) Supply Chain Management / Best Endeavors

The management of Bathwick is committed to taking appropriate action to use best endeavors to ensure the commitment of interested parties to comply with the BPP Program and declarations of compliance shall be obtained.

I) 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 Company shall not require workers to work for more than the national limit of hours in a week on a regular basis and shall comply with the local law.

- c. The Company will 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 workers and provide some discretionary income.
- d. It is the responsibility of concerned personnel to know and understand the relevant employment and labour related legal, regulatory and internal requirements as they apply to their jobs.
- e. When required, due recognition will be given to the existence, membership and lawful activities of worker representative bodies, and worker representatives will be given access to carry out their responsibilities / functions.
- f. Information regarding applicable employment policies and working practices shall be communicated in a transparent manner to all employees

J) Health and Safety

Bathwick 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 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, will be monitored periodically through appropriate medical checks, and reviewed using expert inputs for improvements.
- We will seek to substitute the use of material, which are known to cause an adverse impact on the health of workers or health of consumers in the course of its manufacture or use.

K) 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 Company and any such reported incidents will be viewed as a serious violation of this BPP.

- c. Bathwick 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(However precautionary measures are taken for employees safety) , as long as they are physically and mentally fit to attend to their normal job responsibilities.

L) Child Labour

- a. No form of child labour should be employed at any of the facilities of Bathwick
- b. Unless local laws stipulate a higher age, the minimum age for employment that will be applicable is fifteen (As per ILO Convention No. 138).
- c. For authorized adolescents (persons below 18 years of age but above 15 years), the Company management is responsible for providing working conditions, hours of work and wages in compliance with applicable local laws as a minimum.

M) Forced Labour

- a. The management of Bathwick 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 BPP.
- 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 the said person has not offered himself voluntarily’

N) Human Rights

- All employees in the Company’s facilities will be treated with equality, respect and dignity.
- Bathwick 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 behavior.

- 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.

O) Environment Protection

Bathwick 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.
- Disposal procedures for waste generated will be clearly defined and practiced in line with standards that are set by law and best practices of the industry.
- Stakeholder engagement for effective implementation of environment risk management by reduction, reuse and recycle shall be adopted by the company.

P) Product Security

Bathwick is committed to provide safety of product through out its supply chain by following precaution as mentioned below

- Each and every stage of product processing is covered through Jewelers Block Policy to protect against the possible risk of robbery/ theft etc.
- Suitable safe guarding and storage is ensured at all stage with the help of safes
- All the manufacturing, sales and retailing units are guarded by security agency and monitored by close circuit cameras.
- All the concern persons are trained on relevant safety and security procedures to be followed at all time.
- Organization has developed emergency plan, which includes procedure in case of emergency (include emergency scenario such as theft, robbery etc).

Company shall ensure that none of its supplies are coming from above sources. Bathwick shall communicate its sourcing policy to all the stakeholders and will ensure effective implementation among them.

Q) PUBLIC GRIEVANCES

Bathwick keeping in view of the increasing importance of public grievances, have introduced the common grievance cell under the group compliance officer to look in to matter of

reporting non compliance against any of the company policy or raising red flag against any of its business entity or individual involved in activities which will bring industry in disrepute.