AVANT INDIA PRIVATE LIMITED

Ethical Business Policy Document

ABSTRACT
Ethical Business Policy Document management

Partners
Controlled copy

Avant India Private Limited

Policy Document	Policies	Rev. No. 01
Doc. No. AIPL-001		Date: 01-04-2026

DOCUMENT APPROVAL

The following is a description of the policies and approval of policies and procedures that apply to the business partners, internal and external stake older and employees. These are defined as group level policies and company level policies should not contradict this policy document.

Scope of Materials: Diamonds/Lab Grown Material

Applicable Standard: RJC CoP 2024/RJC LGMS 2025

This Policy Document (AIPL-001) is to define rules and regulation and way of working for the operations and activities of the company Avant India Private Limited in relation to the requirements of Responsible Jewellery council and ethical business practice.

The contents of this document have been reviewed and approved by Director and subject to Annual review.

All internal and external stakeholders of Avant India Private Limited are required to be familiar with this document and follow the risk mitigating measures identified in this document.

Management is responsible to make changes / revisions to this document and all business partners and stake holders are advised to report any issues violating this document.

The Company is committed to the highest standards of ethical conduct and integrity in its business activities. Every employee and individual acting on the Company's behalf is responsible for maintaining the Company's reputation and for conducting company business honestly and professionally.

About Us

Avant India Private Limited established in 27th May 2022 is diamond trading company based in Mumbai India. Avant India Private Limited provide wide range of assorted and calibrated diamonds in different combinations of 4C's. ***Our eco-***

friendly journey and fascination with laboratory grown diamonds, started 8 years ago. Like our peers, we too were in the mined diamond business, and it was then, that we were introduced to small sized HPHT laboratory grown rough. As an experiment, we bought some and had it cut to get melee goods. When we saw the polished products, we were amazed with the results. We understood immediately that we were holding the future of diamonds in the palm of our hands; the industry's as well as ours.

We have decades of combined experiences, expertise, guidance, dynamic and highly driven young teams – all this, collectively helps us to build a robust and reliable organisation.

Our ingenuity, ethical collaborations and transparency have now made Avant a name to reckon with. Our clients include top jewellery brands, retailers, jewellery manufacturers and diamond dealers. Our skilled teams who are based in Mumbai & Surat, work closely with a plethora of global clients to fulfil their diverse requirements.

We have customers all over world but majority of them are based in USA. We deal with Jewellery manufacturer, jewellery traders and retailers.

RJC Compliance Policy

Avant India Private Limited is a member of Responsible Jewellery Council – RJC and committed for ethical business practices and compliance with Code of Practices in all its business activities.

The management of Avant India Private Limited shall implement responsible ethical, social and environmental practices throughout the diamond supply chain, from mine to retail. We are a responsible entity of diamond supply chain believe in consumer confidence in our trade and request our business partners to follow same. As a part of best endeavors and responsible business entity, we anticipate co-operation of our business partners in adopting the standard and ensuring that the entire diamond supply chain is compliant with respect to business, social and environmental responsibilities. Avant India Private Limited being RJC member with Jewellery manufacturing activity shall comply with RJC

Code of Practice and Chain of Custody requirements. Avant India Private Limited being diamond trading company is complying with RJC Code of Practice. We strongly encourage all our business partners to follow and implement the various requirements of the RJC code of practice and other prevailing trade standards.

More information about the Compliance Program is available on http://www.responsiblejewellery.com.

Policy on Corporate social Responsibility

Social responsibility allows the company's business interests to be reconciled with the legitimate interests of the different stakeholders that may be affected, and also assumes the impact of the company's activities on the community in general and the environment.

Avant India Private Limited maintains a high standards and ethical value when it comes to business. We only deal to those who abide the law and with a high ethical reputation in this industry. As a member of Responsible Jewellery Council (RJC), we follow the practical guidance on performing due diligence pertaining to responsible supply chain management of diamond when sourcing from conflict-affected and high risk areas.

While we run our business based on the expectations of our diverse stakeholders, we also understand the importance of contributing to making the world a better place. At Avant India Private Limited, we strongly believe in the concept wherein the company contributes to building economic, social and environmental imperatives.

Corporate Social Responsibility (CSR) aims to contribute to societal goals of a philanthropic, activist or charitable nature or by engaging in or support volunteering or ethically oriented practices. Our CSR Policy aims to the betterment of a sustainable society and this commitment is ingrained in our core values. We aim to demonstrate these through our actions governed by the CSR policy. This policy applies to our Company and its all activities and may also refer to our suppliers and partners.

Date: 01/04/2026
Place: India

Avant India Private Limited

Policy Document	Policies	Rev. No. 01
Doc. No. AIPL-001		Date: 01-04-2026

Policy on Business Ethics and Transparency

- We will conduct our operations in an open, honest and ethical manner.
- We will ensure that all our operations are legitimate.
- We undertake to keep every partnership and collaboration open and transparent.
- We recognize the importance of protecting all our human, financial, physical, informational, social, environmental and reputational assets
- We will advise our partners, contractors and suppliers of our CSR Policy and will work with them to achieve consistency with the policy

Governance

Avant India Private Limited will undertake its CSR activities as approved by the CSR Committee, through a registered trust or society. The Company will assist the CSR Committee to identify the areas of CSR activities, programs and execution of initiatives as per the guidelines defined. The surplus funds if any arising out of the CSR activities will not form part of the business profit of the Company. The surplus funds will be used in the development of CSR projects in the following year. It will be mandatory for (Avant India Private Limited) to disclose its CSR Policy, programs/projects undertaken, and the expenditure made towards CSR activity. Following activities shall be carries out;

- Donation to Hospitals
- Financial support for social and cultural activities.

Date: 01/04/2026
Place: India

Avant India Private Limited

Policy Document	Policies	Rev. No. 01
Doc. No. AIPL-001		Date: 01-04-2026

Whistle-Blower Policy

Avant India Private Limited has a set policy and Procedure document and firmly believes that it should be implemented in a true spirit with the involvement of all stake holders. Further, the company shall always involves all stake holder in the process of continues improvement and welcome reporting of any incident or observation of breach of policy and procedure from any third party of stake holder. At the same time company shall always believe that any person who reports the breach incident or observed any violation of policy should be provided adequate immunity against any adverse impact on his job or any threat to his/her life or any form of harassment and torture.

The company shall always maintain the confidentiality of the whistle blower and shall not disclose the identity of the whistle blower without written consent from the whistle blower. The company shall always ensure that the person who has reported incident of violation for policy and procedure shall not be penalized or harassed or tortured or threaten by any individual.

The business policies of the company assure that all employees or third party who comes forward in good faith to report issues, that they will be treated fairly and respectfully. While all efforts will be taken to protect the anonymity of employees as far as practicable, any form of retaliation.

Against any such individuals, assuming they have not been involved in the violation will not be tolerated.

a. Company encourages employees or any third party to voice concerns promptly, if they have a genuine reason to believe that a policy, company operation or practice is or will likely be in violation of any law, regulation or internal company rule or policy, including this. In case of any incident with the Whistle-Blower he/she can report to entity head on following Email.

marketing@avant.diamonds

In case if employee wants to register their grievance externally , they can contact the relevant department using following link DIRECTORATE OF PUBLIC

Date: 01/04/2026
Place: India

GRIEVANCES https://dpg.gov.in or https://gjepc.org or else search on google for website of relevant department.

Our employees, suppliers and other parties can report concerns and alleged violations of supply chain/sourcing/due diligence policy as follows:

Reports can be made anonymously and will be fully kept confidential, practicable and allowed by law.

We will not take any retaliatory action against our employees, suppliers, or other parties who make a report in good faith. The company shall take all reasonable action with respect to any such report in 15 working days and put all possible efforts to completion of timely investigation and resolution of complaints and grievances.

Our suppliers are encouraged to contact us if they wish to seek guidance on the application of this Policy.

The company has provided training to management and personnel about the complaints and grievance mechanism, including instructions on the respectful handling of all grievances.

Senior management along with experience compliance team shall be involved at the appropriate level who understand the sensitivities of the situation.

The company shall ensure that the mechanism or any resultant resolutions do not waive or preclude the individual's or group's right to have the same grievance addressed through other available external mechanisms, including administrative, judicial or other non-judicial remedies.

Retain records of complaints and grievances, including responses and outcomes, in a manner that protects the confidentiality and integrity of those filing the grievance, including where anonymity has been requested.

Upon resolution of grievance/suggestion feedback is invited to determine whether corrective actions can be implemented to prevent or mitigate similar grievances in the future.

Date: 01/04/2026
Place: India

Avant India Private Limited

Policy Document	Policies	Rev. No. 01
Doc. No. AIPL-001		Date: 01-04-2026

Equality, Diversity & Inclusion Policy Statement

The Company recognizes that we are all unique, whether in terms of our background, personal characteristics, experience, skills or motivations, and the Company value its people for the differences they bring. These differences, this diversity is powerful.

The Company is committed to building a culture that values openness, fairness, and transparency with a workforce that is truly representative of communities in which it operates and where employees feel respected and able to achieve their potential. Fostering an inclusive culture helps everyone to benefit from a wider range of different perspectives, experiences, and skills. The Company believes that this creates a happier, more productive working environment for all.

This policy statement applies to anyone working for the Company. This includes employees, workers, contractors, and apprentices. The policy also relates to job applicants and is relevant to all stages of the employment relationship.

Date: 01/04/2026
Place: India

Avant India Private Limited

Policy Document	Policies	Rev. No. 01
Doc. No. AIPL-001		Date: 01-04-2026

Ethical Business Policy Statement

The Company is committed to the highest standards of ethical conduct and integrity in its business activities. Every employee and individual acting on the Company's behalf is responsible for maintaining the Company's reputation and for conducting company business honestly and professionally.

This policy outlines the Company's position on prohibiting and preventing bribery, fraud, dishonesty, and illegal activity. The Senior Management take a zero-tolerance approach and are committed to enforcing effective systems throughout the company to prevent, monitor and eliminate any form of dishonesty and consider that such activities have a detrimental impact on business by undermining good governance and distorting free markets.

This policy applies to all employees of the Company, and business partners and external stakeholders. Every employee and associated person acting for, or on behalf of, the Company is responsible for maintaining the highest standards of business conduct. Any breach of this policy will be treated as grounds for serious disciplinary action, and / or constitute a contractual and criminal matter for the individual concerned. The Company is committed to transparency and believes that fair conduct helps to foster deep relationships of trust between the Company and our business partners and customers and as such a breach of this policy may also cause serious damage to the reputation and standing of the Company.

In compliance with statutory legislations and to embed commitment to integrity and honesty the Company will not sanction the following: –

Give or offer any payment, gift, hospitality, or other benefit in the expectation that a business advantage will be received, or to reward any business received.

Accept any offer from a third party that is known or suspected to be made with the expectation that the Company will provide a business advantage for their business or anyone else.

Give or offer any payment to a Government official in any country to facilitate or speed up a routine or necessary procedure.

Date: 01/04/2026
Place: India

Tangible assets and intangible assets such as computer systems, bespoke processes, software, intellectual property, trade secrets and confidential information shall not be used for unauthorized or unlawful purposes or for personal gain.

Engage in any business practice which is unethical or amounts to unfair competition.

Unlawfully or inadvertently acquire, use or disclose to any third party any proprietary information or intellectual property of another party.

Engage in any activity or business practice whether unilaterally or in conjunction with any other party which is in breach of any applicable competition and/or anti-trust law in the relevant jurisdiction.

Unlawfully induce any party to breach a contract with any third party.

Make false statements about a competitor’s products and/or services.

Engage in business with service providers, agents or representatives that do not support our ethical business objectives.

The success of the Company's measures depends on all employees, and those acting for the Company, playing their part in helping to detect and eradicate dishonesty. Therefore, all employees and others acting for, or on behalf of, the Company are encouraged to report any suspected dishonesty in accordance with the procedures. The Company will support any individuals who make such a report, if it is made in good faith.

Date: 01/04/2026
Place: India

Avant India Private Limited

Policy Document	Policies	Rev. No. 01
Doc. No. AIPL-001		Date: 01-04-2026

Modern Slavery Statement

This statement sets out the Company actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

As part of the diamond supply chain, we recognize that we have a responsibility to take a robust approach to slavery and human trafficking and we continue to take our responsibility very seriously during the coronavirus pandemic.

The senior management is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Date: 01/04/2026
Place: India

Avant India Private Limited

Policy Document	Policies	Rev. No. 01
Doc. No. AIPL-001		Date: 01-04-2026

Information Security & Data Protection Policy Statement

The Company shall ensure appropriate technical and organizational measures are taken to prevent unauthorized or unlawful processing of personal data and commercially sensitive information, and to safeguard against accidental loss or destruction of, or damage to same.

To reassure our business partners and other interested parties of our commitment to protecting, securing and controlling systems and data, the company security controls are verified by independent experts.

The Company will act to ensure that measures are implemented to protect the integrity of information, such measures shall include:

Protecting computer networks, all desktop and portable computers and handheld devices with user log-in credentials, complex passwords and, where appropriate, biometrics.

Protecting networks from any damaging executables or scripts introduced by portable media, not limited to, but such as memory sticks and optical storage.

Utilization of Anti-Virus, Anti-Malware and Anti-Adware programs that are updated to the latest database definitions.

Firewalls to protect against unwanted intrusion into networks, servers, computers and hand held devices.

Maintaining information to ensure that it is accurate and complete.

Copies of back-ups are kept off-site using controlled and secure procedures.

Adherence to contracts with our clients that contain strict no-publicity clauses and thus photographic media taken on clients' premises and sites will not be used or displayed without explicit permission to do so.

Communicating Confidentiality Agreements and Non-Disclosure Agreements to relevant personnel.

Date: 01/04/2026
Place: India

Promoting good security practices and training those whom we employ, providing guidance, awareness and advice on the importance of protecting confidential and sensitive information.

Limited and monitored employee access to Social media and networking.

Enacting disciplinary action against any employee who jeopardizes the security and confidentiality of information/data entrusted to the company.

Communication Logs that are only accessible by authorized personnel shall be retained for the purpose of fault diagnosis and user support.

By implementing the above security measures, we shall comply with business, contractual, and regulatory requirements, including those of the General Data Protection Regulation.

This policy is communicated to our supply chain, relevant interested parties and all those working for, or on behalf of, the company.

Date: 01/04/2026
Place: India

Avant India Private Limited

Policy Document	Policies	Rev. No. 01
Doc. No. AIPL-001		Date: 01-04-2026

Policy Statement of Child Labour

a. No form of child labour should be employed at Avant India Private Limited
b. 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 entity management is responsible for providing working conditions, hours of work and wages in compliance with applicable local laws as a minimum.
d. If a child is found working at Avant India Private Limited either own or subcontracted, the responsibility of rehabilitation will be undertaken by the management.
e. The above policies will also be applicable to all business partners.

Date: 01/04/2026
Place: India

Avant India Private Limited

Policy Document	Policies	Rev. No. 01
Doc. No. AIPL-001		Date: 01-04-2026

Policy Statement of Forced Labour

The policies relating to this section are part of the Business Policies adopted by Avant India Private Limited and are presented below for reference:

a. The management of Avant India Private Limited are fully committed to ensuring that forced or involuntary, bonded, indentured or prison labour, is not practiced nor used in any form at any of its facilities. Avant India Private Limited shall ensure that there is no restriction in the freedom of movement of employees and dependents. Any reported incidents relating to forced labour will be considered as a serious violation of the Business Policies.

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"*

Date: 01/04/2026
Place: India

Avant India Private Limited

Policy Document	Policies	Rev. No. 01
Doc. No. AIPL-001		Date: 01-04-2026

Policy Statement Kimberley Process

The policies relating to this section are part of the Business Policies adopted by Avant India Private Limited are presented below for reference:

a. Avant India Private Limited 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 Gemstone 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:

d. "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."

e. Entering into transactions involving 'conflict diamonds' or not following the System of Warranties Declaration in invoices, either knowingly or unknowingly, will be considered as a violation of the Business Policies.

f. Avant India Private Limited ensures that concerned personnel within the organization know about government restrictions on the trade in Conflict Diamonds, the Kimberley Process Certification Scheme and the World Diamond Council System of Warranties.

Date: 01/04/2026
Place: India

Avant India Private Limited

Policy Document	Policies	Rev. No. 01
Doc. No. AIPL-001		Date: 01-04-2026

Policy Statement General Employment, Working hours, Remuneration

a. Avant India Private Limited complies with applicable national laws / regulations with respect to employment.

b. Avant India Private Limitedis committed to maintaining appropriate records as stipulated by the regulatory authorities for all staff employed, whether on a full time, part time or seasonal basis.

c. Avant India Private Limited shall not require workers to work for more than the national limit of hours in a week on a regular basis, with overtime hours not to exceed the national permitted limit per week on a regular basis unless there are legal opt-outs.

d. Avant India Private Limited 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 workers.

e. Wages shall be paid to employees on a regular and predetermined basis in a manner and location convenient to employees, accompanied by a wage slip detailing wage rates, benefits and deductions as applicable.

f. Avant India Private Limited shall ensure that due process of wage deductions shall be followed where applicable and it shall not be binding on employees to buy provisions from the group.

g. 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.

h. Avant India Private Limitedis committed to addressing the legitimate grievances of its employees.

i. Avant India Private Limited shall follow proper procedure as per law for dismissal of employees, in case the need for the same arises, and arbitrary dismissal procedures shall be avoided.

j. Information regarding applicable employment policies and working practices shall be communicated in a transparent manner to all employees.

Date: 01/04/2026
Place: India

k. Avant India Private Limited is fully committed to the pursuance of the provision of fair and conducive employment conditions, consistent with applicable laws and regulations.

Date: 01/04/2026
Place: India

Avant India Private Limited

Policy Document	Policies	Rev. No. 01
Doc. No. AIPL-001		Date: 01-04-2026

Policy Statement Money Laundering and Finance of terrorism

The policies relating to this section are part of the Business Policies adopted by Avant India Private Limited is presented below for reference:

a. Avant India Private Limited 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 required at all times, with all applicable national and, where appropriate, international laws / regulations with respect to money laundering, terrorism financing, bribery, corruption, smuggling, embezzlement, fraud, racketeering, transfer pricing and tax evasion.

c. Avant India Private Limited shall act in accordance with national laws and national / international accounting standards with respect to maintaining financial accounts of all business transactions and auditing of its financial accounts.

d. Avant India Private Limited ensures that concerned employees know and understand the relevant regulatory jurisdiction for national and international transactions, 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 Policies, depending on the seriousness of the non-conformance.

e. Avant India Private Limited implements a “Know your Customer” and “Know your Supplier” procedure that establishes the identity of all organizations with which it deals, have a clear understanding of their business relationships and have a reasonable ability to identify and react to transaction patterns appearing out of the ordinary or suspicious.

Key Regulations

In India, gems and jewellery dealers with an annual turnover of ₹2 crore or more must comply with the Prevention of Money Laundering Act (PMLA), 2002. Mandatory compliance includes KYC for transactions above ₹2 lakh,

reporting cash transactions exceeding ₹10 lakh to FIU-India, maintaining records for 5 years, and monitoring high-risk clients to prevent terrorist financing.

Key Regulations and Compliance Requirements

- **Applicability:** Dealers in precious metals and stones (DPMS) with a turnover exceeding ₹2 crore in the previous financial year.
- **Mandatory Reporting (FIU-India):**
  - **Cash Transactions:** All cash transactions totalling over ₹10 lakh, whether in one or multiple linked transactions.
  - **Suspicious Transactions:** Any transaction suspected to involve proceeds of crime must be reported within seven working days.
- **Know Your Customer (KYC) Norms:**
  - Mandatory for all cash transactions of ₹2 lakh and above.
  - Required documentation includes Aadhaar, PAN card, or equivalent KYC documents to verify the client's identity.
- **Record Maintenance:** Transaction records must be maintained for at least 5 years.
- **Internal Compliance:** Businesses must develop internal policies to identify high-risk clients and train staff to detect suspicious activities.
- **Penalty:** Non-compliance can lead to actions by the Enforcement Directorate (ED), including fines or seizure of properties involved in money laundering, as per the PMLA Regulations via Indian Jeweller.

Other Applicable Laws

- **Unlawful Activities (Prevention) Act (UAPA), 1967:** Prohibits doing business with individuals on sanctioned or terrorist lists.
- **Income Tax Act, 1961:** Restricts cash transactions over specific limits (e.g., Section 269ST prohibits cash receipt of ₹2 lakh or more from a person in a day).

Avant India Private Limited

Policy Document	Policies	Rev. No. 01
Doc. No. AIPL-001		Date: 01-04-2026

Policy Statement of Freedom of association and Collective Bargaining, Discrimination and Discipline and Grievance Procedures

The policies relating to this section are part of the Business Policies adopted by Avant India Private Limited and are presented below for reference:

a. Avant India Private Limited will not prevent employees from associating and collective bargaining

b. Discrimination can mean distinction, exclusion or preference.

c. Any form of discrimination relating to the hiring, discharge, pay, promotion and training of employees on the basis of race, ethnicity, caste, national origin, religion, age, disability, gender, marital status, physical appearance, sexual orientation, HIV status, Migrant status, membership of worker representative bodies, political affiliations, or any criteria that are unlawful is strongly discouraged by Avant India Private Limited and any such reported incidents will be viewed as a serious violation of this Business Policies.

d. Avant India Private Limited 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.

e. Individuals who are “Fit for Work” shall be accorded equal opportunities and shall not be discriminated against on the basis of factors unrelated to their ability to perform their job.

f. Avant India Private Limited shall not use corporal punishment under any circumstances and will ensure that employees are not subjected to harsh or degrading treatment, sexual or physical harassment or other forms of mental or physical coercion, abuse or intimidation.

g. Avant India Private Limited encourages all personnel to voice concerns promptly, if they have a genuine reason to believe that a policy, entity operation or practice is or will likely be in violation of any law, regulation or internal entity rule or policy, including this Business Policies. Avant India Private Limited assures all employees who come forward in good faith to report issues, that they will be treated fairly and respectfully. While all efforts

will be taken to protect the anonymity of employees as far as practicable, any form of retaliation against any such individual, assuming they have not been involved in the violation, will not be tolerated.

h. Avant India Private Limited strictly prohibit all forms of discrimination, harassment and bullying and violation. No employees or visitors shall be allowed to discriminate, harassment be it verbal or physical and bullying any individual. The group requests all individual to behave respectfully and adhere to the policy.

i. The group ensure that there are equal opportunities for all individuals who are fit to work provided for all aspects of employment, including recruitment, wages, benefits, promotions, training, transfer, termination, and retirement.

Freedom of association is a fundamental right in India, guaranteed under the Constitution, which allows employees to form unions and associations to protect their interests, and employers to form associations. For companies in India, this right is primarily regulated by constitutional provisions, statutory labor laws, and upcoming consolidated labor codes.

Key Applicable Regulations and Laws

- **Constitution of India (Article 19(1)(c)):** Guarantees all citizens the fundamental right to form associations, unions, or cooperative societies.
- **Trade Unions Act, 1926:** The primary legislation governing the registration, management, and rights of trade unions.
- **Industrial Disputes Act, 1947:** Governs the resolution of disputes between employers and employees and recognizes the role of unions in collective bargaining.
- **Industrial Relations Code, 2020 (Upcoming):** This code, once fully in effect, will replace the Trade Unions Act, 1926, and introduce formal concepts like "negotiating unions" or "negotiating councils" based on membership percentage (51% or more for sole representation).
- **State-Specific Legislations:** Certain states have specific laws, such as the *Maharashtra Recognition of Trade Unions and Prevention of Unfair Labour Practices Act, 1971* and the *Kerala Recognition of Trade Unions Act, 2010*.

Avant India Private Limited

Policy Document	Policies	Rev. No. 01
Doc. No. AIPL-001		Date: 01-04-2026

Key Principles and Obligations for Companies

- **Right to Form and Join:** Workers have the right to form and join unions of their choice without previous authorization or fear of intimidation.
- **Non-Interference:** Employers must not interfere in the formation or functioning of employee unions and must respect their rights to collective bargaining.
- **Recognition of Unions:** While the Trade Unions Act does not explicitly mandate union recognition, the Industrial Relations Code, 2020, will formalize the process of identifying a negotiating union or council.
- **Unfair Labour Practices:** Employers are restricted from discriminating against workers for union membership, including dismissals or retaliatory actions.
- **Freedom of Association Policies:** Many companies in India adopt specific "Freedom of Association and Collective Bargaining Policies" to ensure compliance with International Labour Organization (ILO) standards and UN Global Compact principles.

Date: 01/04/2026
Place: India

Avant India Private Limited

Policy Document	Policies	Rev. No. 01
Doc. No. AIPL-001		Date: 01-04-2026

Policy Statement of Product Integrity

a. Avant India Private Limited is committed to complying with relevant trading standard legislation and specific national and local regulations applicable to its products.

b. The following essential Policies will be applicable in all transactions of Avant India Private Limited involving diamonds, treated diamonds, synthetics and stimulant

- **Disclosure -** Avant India Private Limited shall fully and accurately disclose the material characteristic of their products. All reasonable efforts shall be made to properly disclose all relevant information on the physical characteristics, such as mass/weight, cut, cut, colour, clarity or fineness, of a diamond or gold jewellery product.
- **Misrepresentation -** No untruthful, misleading or deceptive statement, "representation" or material omission in the "selling", "advertising" or distribution of any diamond, treated diamond, synthetic, or simulant, or any gold product, shall be made by the Group and its entities in any medium, including the internet
- **Diamond Quality -** The weight, colour, clarity or cut of diamonds will be described in accordance with the recognized guidelines appropriate to the particular jurisdiction.
- 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 misrepresentations or attempts to disguise the product will be made in the selling, advertising and distribution of treated diamonds, synthetics and simulant.
- The word 'diamond' will not be used in the case of names of firms, manufacturers or trademarks; in connection with treated diamonds or diamond simulant or synthetic Diamonds.

c. Avant India Private Limited has adopted the following definitions:

Avant India Private Limited

Policy Document	Policies	Rev. No. 01
Doc. No. AIPL-001		Date: 01-04-2026

Diamond: A diamond is a natural mineral consisting essentially of pure carbon crystallized with a cubic structure in the isometric system. Its hardness in the Mohs scale is 10; its specific gravity is approximately 3.52; it has a refractive index of 2.42 and it can be found in many colours.

Synthetic: A synthetic is any object or object that has been either partially or wholly crystallized or re-crystallized due to artificial human intervention such that, with the exception of being non-natural, the product meets the requirements specified in the definition of the word 'diamond' above.

Treated Diamond: A treated diamond is any object or product that meets the requirements specified in the definition of the words 'diamond' and 'synthetic' above, but has been subject to some form of treatment i.e. any process, enhancement changing, interfering with and/or contaminating the natural appearance or composition of a diamond other than historically accepted practices of cutting and polishing. This includes colour and decolourisation treatment, fracture filling, laser and irradiation treatment and coating.

Simulants: A diamond simulant is any object or product used to imitate some or all of the properties associated with a diamond and includes any material, which does not meet the requirements specified in the definition of the word 'diamond' above.

Lab Grown Material: Any reference to lab-grown materials within this standard shall be understood as meaning lab-grown diamonds and lab-grown coloured gemstones (emeralds, rubies and sapphires), used within the jewellery and watch supply chain, and within an RJC member's certification scope. This includes any lab-grown materials that are: • whole or partial, composite (assembled), constructed, restructured; • coatings (on natural or lab-grown stones); and • rough, polished and recycled.

Date: 01/04/2026
Place: India

Avant India Private Limited

Policy Document	Policies	Rev. No. 01
Doc. No. AIPL-001		Date: 01-04-2026

Policy Statement Product Security

a. Avant India Private Limited is committed to establish and implement product security measures within the premises and during shipments to protect against product theft, damage or substitution.

b. The security and well-being of employees, visitors and other relevant business partners is prioritized when establishing product security measures.

Date: 01/04/2026
Place: India

Avant India Private Limited

Policy Document	Policies	Rev. No. 01
Doc. No. AIPL-001		Date: 01-04-2026

Disclosure of Treated Diamonds, Synthetics and Stimulants

Policy Statement

The policies relating to this section are part of the Business Principles adopted by Avant India Private Limited. and are presented below for reference:

The following essential principles will be applicable in all the entity's transactions involving treated diamonds, synthetics and stimulants.

- 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.
- Full disclosure to the purchaser will take place when offered for sale, such that
  - Full verbal disclosure will clearly take place during sale.
  - Full written disclosure will be conspicuously included on each bill of sale or receipt in plain language and readily understandable to the purchaser. Written discloser will normally be in English language
- 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 stimulants.
- The word 'diamond' will not be used in the case of names of firms, manufactures or trademarks; in connection with treated diamonds or diamond stimulants or synthetic diamonds."

" **Avant India Private Limited**" has adopted the following definitions:

Diamond: A diamond is a natural mineral consisting essentially of pure carbon crystallized with a cubic structure in the isometric system. Its hardness in the Mohs scale is 10; its specific gravity is approximately 3.52; it has a refractive index of 2.42 and it can be found in many colours.

Synthetic: A synthetic is any object that has been either partially or wholly crystallized or re-crystallized due to artificial human intervention such that,

with the exception of being non-natural, the product meets the requirements specified in the definition of the word 'diamond' above.

Treated Diamond: A treated diamond is any object or product that meets the requirements specified in the definition of the words 'diamond and synthetic' above, but has been subject to some from of treatment i.e. any process, enhancement changing, interfering with and/or contaminating the natural appearance or composition of a diamond other than historically accepted practices of cutting and polishing. This includes color and decolourisation treatment, fracture filling, laser and irradiation treatment and coating.

Stimulants: A diamond stimulant is any object or product used to imitate some or all of the properties associated with a diamond and includes any material, which does not meet the requirements specified in the definition of the word 'diamond' above.

Policy Statement Bribery and Facilitation Payments

The policies relating to this section are part of the Business Policies adopted by Avant India Private Limited and are presented below for reference:

a Avant India Private Limited *is* committed to prohibit bribery in all business practices and transactions that are carried out by the company or on its behalf by business partners. The company will not offer, accept or countenance any payments, gifts in kind, hospitality, expenses or promises as such that may compromise the principles of fair competition or constitute an attempt to obtain or retain business for or with, or direct business to, any person; to influence the course of the business or governmental decision – making process.

b. Avant India Private Limited considers Bribery Risk as it applies to its organization (including agents) to identify which areas pose high risks. Avant India Private Limited has developed appropriate methods to monitor the conduct of employees and agents and eliminate bribery based on this understanding.

c. The management of Avant India Private Limited facilitates the reporting of incidences of attempted bribery or inappropriate gifts within their organization and shall apply appropriate sanctions for bribery and attempted bribery in all forms.

d. Avant India Private Limited ensures that no employee will suffer demotion, penalty or other adverse consequences for voicing a concern, or for refusing to pay a bribe or facilitation payment even if this action may result in the enterprise losing business.

Key Regulations & Provisions:

- **Prevention of Corruption Act, 1988 (as amended):** Makes it a specific offence for a commercial organization to bribe a public servant.
- **Corporate Liability:** Companies can be prosecuted, and key officials can face imprisonment (3 to 7 years) and fines if a bribe is paid on the company's behalf.
- **Facilitation Payments:** Considered bribes, facilitation payments (small payments to speed up routine processes) are prohibited under Indian law, even if seen as common local practice.
- **Bribery in Private Sector:** While the PCA focuses on public servants, other laws like the Indian Penal Code, 1860 (IPC) and companies act cover fraud and breach of trust in the private sector.
- **Foreign Contribution (Regulation) Act, 2010 (FCRA):** Regulates the acceptance of foreign contributions, which could be linked to bribery in some instances.
- **Companies Act, 2013 (Section 177):** Mandates a vigil mechanism for directors and employees to report genuine concerns, including fraud or bribery.

Compliance Requirements for Companies:

- Implement a strong Anti-Bribery and Corruption (ABAC) policy.
- Perform due diligence on third-party agents, suppliers, and consultants.

Date: 01/04/2026
Place: India

- Ensure accurate books and records to detect improper payments.
- Proactively train employees and provide training on anti-bribery measures.

Policy Statement Community Engagement and Development

- The policies relating to this section are part of the Business Policies adopted by Avant India Private Limited and are presented below for reference:
- Avant India Private Limited is committed to the development of communities where it operates, contributing to their social and economic welfare.

Date: 01/04/2026
Place: India

Avant India Private Limited

Policy Document	Policies	Rev. No. 01
Doc. No. AIPL-001		Date: 01-04-2026

Policy Statement Environmental protection, Use of Energy and natural resources

The policies relating to this section are part of the Business Policies adopted by Avant India Private Limited and are presented below for reference:

Avant India Private Limited is committed to effective environmental performance and will focus on the following initiatives:

- Conduct business in an environmentally responsible manner.
- Compliance with all applicable environmental laws and regulations
- The impact of our operations on the environment will be assessed 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.
- Improvement of employee environmental awareness and performance through training.
- Efficient use of energy and natural resources to minimize waste generation through efforts that include recycling and prevention of pollution.
- Commitment to a continual improvement process in environmental management

Date: 01/04/2026
Place: India

Avant India Private Limited

Policy Document	Policies	Rev. No. 01
Doc. No. AIPL-001		Date: 01-04-2026

Policy Statement Health and Safety

The policies relating to this section are part of the Business Policies adopted by Avant India Private Limited and are presented below for reference:

Avant India Private Limited recognizes the need to develop a sustainable, value creating business and is committed to the following in the areas of workplace health and safety:

- Providing safe and healthy working conditions for all employees in accordance with applicable law and other relevant industry standards.
- 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.
- We will provide adequate and appropriate labeling and storage of all chemicals and cleaning materials and adopt methods to protect employees from exposure to airborne particles and chemical fumes
- Our review of our processes will use appropriate standards as required by prevailing laws, expert opinion, feedback from workers and our knowledge of best practices. The review will lead to formulation of clearly described work practices and safety drills and appropriate safeguards and isolation from mobile equipment. All our staff will be trained in the manner required to adhere to these work practices and drills.
- Workers shall not be under the influence of or abusing, drugs, alcohol and/ or other illegal substances.
- 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 use.
- All workplaces will be constructed to meet safety standards with local regulations as the minimum standards that will be applicable.
- We will take adequate measures to safeguard our employees from fire and other workplace injuries.
- All products sold by Avant India Private Limited to consumers shall comply to applicable regulations of product health and safety.

Date: 01/04/2026
Place: India

Avant India Private Limited

Policy Document	Policies	Rev. No. 01
Doc. No. AIPL-001		Date: 01-04-2026

Policy Statement of Human Rights

The policies relating to this section are part of the Business Policies adopted by Avant India Private Limited and are presented below for reference:

a) All employees in Avant India Private Limited will be treated with equality, respect and dignity.

b) Avant India Private Limited believes in and respects fundamental human rights according to the United Nations Universal Declaration of Human Rights.

c) Avant India Private Limited 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

d) Avant India Private Limited strongly discourages any form of sexually coercive, threatening, abusive or exploitative behavior.

e) 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 Group.

f) Security personnel, if employed by Avant India Private Limited are trained to respect the human rights and dignity of all people and use of minimum force proportionate to the perceived threat.

g) Wherever the any violation of human rights are observed, the company shall take mitigation action and if needed hire an external non-governmental organization for the implementation.

h) Human rights risk assessment shall be done annually covering internal and external stakeholders.

i) The group shall conduct human right risk assessment and upon any violation observed internal or external stake holders, company shall develop and implement risk mitigation plan according to severity of incident. The company may seek assistance from external NGO's or experts to develop and implement mitigation plan and monitoring.

j) The group shall provide support and consultation to external stakeholders upon written request by the business partners.

Date: 01/04/2026
Place: India

Avant India Private Limited

Policy Document	Policies	Rev. No. 01
Doc. No. AIPL-001		Date: 01-04-2026

Policy Statement Use of Security Personnel

The policies relating to this section are part of the Business Policies adopted by Avant India Private Limited and are presented below for reference:

Security personnel, if employed by Avant India Private Limited are trained to respect the human rights and dignity of all people and use of minimum force proportionate to the perceived threat.

Date: 01/04/2026
Place: India

Avant India Private Limited

Policy Document	Policies	Rev. No. 01
Doc. No. AIPL-001		Date: 01-04-2026

Provenance Claims

The policies relating to this section are part of the Business Principles adopted by AVANT INDIA PRIVATE LIMITED and are presented below for reference:

“The company shall ensure all its Provenance Claims made will be fully valid along with available evidence to support the Claim(s)”

Origin - Geographical origin of material, for example country, region, mine or corporate ownership of the Mining Facility/ies; and/or DTC Diamonds…

Source - Type of source, for example recycled, mined, artisanally mined, or date of production; and/or

Provenance Claims may also relate to origin, sources or practices that are specifically excluded from the supply chain, such as through a ‘negative warranty’.

The company shall ensure that all claims and statements (made to consumers or other businesses) on practices in the supply chain and the origin or source of Diamonds, Synthetics, Gold and / or Platinum through the use of both descriptions and symbols are valid.

The company shall ensure that there will be no attempt to mislead consumers through illustrations, descriptions, expressions, words, figures, depictions or symbols relating to the Provenance Claim(s).

The company shall ensure that all the relevant employees are aware about the provenance claim and it procedures. The group has implemented policy and procedure for following provenance claim.

"Based on written assurance from our suppliers, Avant India Private Limited, states that diamonds have not been originated from the MBADA and Marange resources of Zimbabwe. The diamonds herein invoiced are not sourced from artisanal mines."

Date: 01/04/2026
Place: India

Avant India Private Limited

Policy Document	Policies	Rev. No. 01
Doc. No. AIPL-001		Date: 01-04-2026

Policy of Lab Grown Material

The requirements for establishing responsible business practices throughout the jewellery and watch supply chain, for handling laboratory grown materials

The LGMS is comprised broad objectives:

- To improve legal and regulatory compliance, strengthen public reporting and secure a commitment to responsible business practices.
- To increase the use of due diligence in supply chains to uphold human rights, support community development, promote anti-corruption efforts and manage sourcing risks.
- To adequately control and disclose information about products and so avoid misleading or deceptive marketing practices.
- To protect the health and safety of both people and environments and to use natural resources efficiently.
- To better comply with international labour conventions and ensure responsible working conditions.
- Any reference to lab-grown materials within this standard shall be understood as meaning lab-grown diamonds and lab-grown coloured gemstones (emeralds, rubies and sapphires), used within the jewellery and watch supply chain, and within an RJC member's certification scope. This includes any lab-grown materials that are: • whole or partial, composite (assembled), constructed, restructured; • coatings (on natural or lab-grown stones); and • rough, polished and recycled
- Members shall disclose information on the physical characteristics of the products listed in LGMS 27.1 in compliance with applicable law. Unless a conflict with applicable law exists, members shall apply the following requirements to support disclosure about physical characteristics: a. Laboratory grown materials: Wholly or partially laboratory-grown materials shall be disclosed as 'laboratory grown', 'laboratory created', '[manufacturer

name] – created', and/or 'synthetic'. Abbreviations such as 'lab-grown' or 'lab-created' are also acceptable. The description shall be equally as conspicuous as the word 'diamond' or the name of the coloured gemstone. i. In the case of coating, the material being coated must be disclosed as 'coated [name of material]'

- Composites: Composite (or assembled) lab-grown materials constructed of two or more parts shall be disclosed as 'composite', 'assembled', 'doublet' or 'triplet', and by the correct name of the material of which it is composed. The use of the term 'diamond/ gemstone' or 'laboratory/created/synthetic diamond/gemstone' in relation to such stones is unacceptable. The description shall be equally as conspicuous as the name of the material used. Members shall not use terms and definitions that are misleading in relation to composite (assembled) stones and/or conceal information about their parts. c. Reconstructed stones: Reconstructed stones using lab-grown materials shall be disclosed as such and the description shall be equally conspicuous as the name of the material. d. Simulants (or imitation): Any product used to imitate the appearance of lab-grown materials without having their chemical composition, physical properties and/or their structure shall be disclosed as 'imitation' or 'simulant' along with the correct name of the material of which it is composed, for example, 'x compound', 'glass', 'plastic'. The description shall be equally as conspicuous as name of the lab-grown material. Simulants must not be referred to as laboratory grown or laboratory created. e. Descriptions of polished lab-grown materials: Describe the dimension or carat weight, colour, clarity and cut of lab-grown diamonds and coloured gemstones in accordance with the recognised guidelines appropriate to the particular jurisdiction. f. Enhancements: Any part of the growth/manufacturing process or subsequent enhancements to the created material that are deemed to be unstable and/or non permanent in nature shall be disclosed. g. Product health and safety information: Any relevant health and safety information about the materials listed in LGMS 27.1 in jewellery products sold by members to end consumers shall be disclosed. This includes irradiated lab-grown materials.

Date: 01/04/2026
Place: India

Avant India Private Limited

Policy Document	Policies	Rev. No. 01
Doc. No. AIPL-001		Date: 01-04-2026

Ethical business Practice and Supply chain compliance

The Policy promote the standards that we expect all of our suppliers to comply with when producing and supplying Diamonds/LGMS to Avant India Private Limited, no matter where they operate in the world. We hereby inform all our suppliers to provide first mine of origin for the material they supply to us. We request all our suppliers not to supply any material that is subject to restriction as per EU Reg. 833/2014.

The senior management of Avant India Private Limited advocate this policy and we shall review as and when changes in the process or compliance requirement or any violation of sourcing policy or Changes in risk and due diligence criteria. We shall carry out review of this entire document at least annually.

We recognise that full compliance with these criteria may take time for some suppliers, and we are committed to working with our suppliers to implement improvement plans and help them achieve compliance.

Avant India Private Limited is committed to working in partnership with its suppliers to help achieve compliance with this Policy.

All the supplier should comply with national and international law and trade requirement like RJC with respect to Bribery and Corruption, Financial Offence, Labour Rights, Kimberley process and World Diamond Council – SoW, Product disclosure, Labour Rights, Working Condition, Child labour, Forced labour, Human rights, Discrimination, Fair wages and working hours, Environment compliance, Health and safety of the employees and visitor.

Policy – Supply Chain and Ethical Sourcing

At Avant India Private Limited, we take Ethical business practice, social and environmental factors into consideration in making decisions on the procurement of Rough or polish diamonds.

Date: 01/04/2026
Place: India

Avant India Private Limited

Policy Document	Policies	Rev. No. 01
Doc. No. AIPL-001		Date: 01-04-2026

This Policy shows company's commitment and its expectations for its product suppliers regarding actions to address Conflict Diamonds.

Avant India Private Limited expects it's suppliers to have in place policies and due diligence measures that will enable us to reasonably assure that diamonds supplied to us containing conflict free diamonds are not belongs to Conflict-affected and high-risk areas – CAHRAs .

We being a responsible company, Avant India Private Limited supports the goal of the Dodd-Frank Act of preventing armed groups in the conflict affected and high risk countries from benefitting from the sourcing of Conflict diamonds from that region.

Avant India Private Limited is committed to working with its suppliers to educate them on these matters and concerning steps they can take to obtain increased transparency regarding the origin of diamonds mined or manufacture and sell to Avant India Private Limited. Avant India Private Limited reserves the right to evaluate the extent to which a supplier has failed to reasonably comply with this Policy.

Avant India Private Limited reserves the right to request additional documentation from its suppliers regarding the origin/source of diamonds sold to Avant India Private Limited.

Suppliers who do not reasonably comply with this Policy shall be reviewed by Avant India Private Limited 's for future business.

Avant India Private Limited is committed to ensuring that our supply chain is free of any diamonds which was procured for the support or benefit of armed and anti-social conflict groups or involving serious abuses of human rights and non-compliant with OECD Guidelines.

Avant India Private Limited clearly criticizes such activity and will reject any material which we believe was obtained involving serious human rights

violations or which benefitted or supported armed rebels or terrorist groups through illegal finance or other activities.

The company shall carry out risk assessment for its supply chain and shall not enter into any business relationship or if may require then shall suspend/discontinue the engagement with any such supplier involved in dealing with Conflict-Affected and High-Risk areas, Any form of Human Right Violation; Torture, Cruel, In-Human and Degrading Treatment; Forced/Compulsory Labour; Child Labour; Abuses such as widespread Sexual Violence; War Crimes; other serious violations of International Humanitarian Law, Crime against Humanity; Genocide and/or To Bribe or To be Bribed. We strictly condemn and prohibit any Direct/Indirect support to public/private security forces which illegally Control, Tax or Extort money from Mining Sites, Transportation Routes and Upstream Sectors.

The Company shall carry out due diligence to assess risks related to procurement from the Conflict-affected and high-risk areas – CAHRAs and shall always source from compliant miners/traders.

We shall always set reasonable efforts to source Diamonds from miners and traders validated as being Conflict Free and require their direct and indirect suppliers to do the same;

We strive to work supportively with our customers and supply chain partners in implementing conflict free compliance programs for Diamond/Jewellery Supply chain.

Date: 01/04/2026
Place: India

Avant India Private Limited

Policy Document	Policies	Rev. No. 01
Doc. No. AIPL-001		Date: 01-04-2026

Policy – Due Diligence and Risk Assessment

The company shall always undertake to ensure that the extraction and trade of diamond/coloured gemstone/gold/silver/pgm support peace and development, not conflict.

Avant India Private Limited remains committed to enhance its Supply Chain Due Diligence program through internal review and external assessments. We have zero tolerance policy for the supplier violating OECD due diligence guideline and we shall immediately stop commercial relationship if any of our business associates found non-compliant or High-Risk during our internal/external risk assessment.

All the suppliers are also requested to carry our risk assessment and due diligence for their suppliers and products they are sourcing.

Currently Avant India Private Limited procure it's diamonds/gold/silver/pgm/coloured gemstone from RJC CoP/Ethical business practice compliant miners/traders. However, we have established a strong due diligence process and we shall review it as an when we observed significant risk or upon receipt of any grievance or complaint but in normal course, we shall carry our due diligence process on annual basis.

Identify red-flags and Risk

The company has checked transaction methods and name and individuals of company on SDN list of USA treasury and EU sanction list. All the suppliers are found low in risk and in compliance with OECD requirement of CAHRA's.

Risk mitigation plan

- ✓ Company shall always deal with legitimate company.
- ✓ Always complete due diligence and risk assessment before establishing commercial relationships.
- ✓ Make sure that do transaction shall be carried out with business sense.

Date: 01/04/2026
Place: India

- ✓ Immediately stop commercial relationship upon any violation observed an report to concerned internal and external reporting authority.
- ✓ Continuously monitor suspicious transactions and red flag records
- ✓ Communication and awareness to suppliers

Supplier Risk Assessment /Due Diligence Report

We the senior management of Avant India Private Limited and compliance officer has verified all our supplier with respect to following ;

OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

US OFAC Sanctions

EU Sanctions

Global Peace Index

Know Your Country

Transparency International (TI)

The Office of the United Nations High Commissioner for Human Rights (OHCHR)

http://www.responsiblemineralsinitiative.org/minerals-due-diligence/risk-management/conflict-affected-and-high-risk-areas/

Publication (Detailed report is with Compliance team and may produce to concerned parties upon request)

Compliance team of Avant India Private Limited has completed the due diligence and Risk assessment of all its supplier with respect to latest RJC guideline and we found all our supplier are complying with requirements did not find any risk pertaining to their business involvement in Conflict Affected and high risk Areas' (CAHR's).

RJC CoP/ LGMS Annual Compliance - 2025: The company has carried our ethical business practice and carried out policy and procedure review with respect to it's implementation. The company has complied with the latest RJC Code of Practice /LGMS and all its requirement. **Ethical**

Avant India Private Limited

Policy Document	Policies	Rev. No. 01
Doc. No. AIPL-001		Date: 01-04-2026

Standard/Commitment-- No practice or conduct observed during the assessment period that brings the diamond industry into disrepute. All businesses practices have adhered to national laws and applicable rules and regulation during the assessment period.

We have conducted risk assessment and due diligence of all our suppliers and customers with respect to latest OECD requirements and RJC guideline and we found all our supplier are complying with requirements did not find any risk pertaining to their business involvement in Conflict Affected and high-risk Areas' (CAHR's).

Sr#	Description	Comments
1	Is the company dealing with any illegitimate customers/suppliers?	No
2	Any violation of CAHRA's during last one year?	No
3	Dealing with any illegitimate business partners?	No
4	Any incident of Human right violation or financial offence observed?	No
5	Suppliers are complying with OECD requirements?	Yes
6	Any material sourced from Violated area?	No
7	Any unethical business practice observed in any business partners activity?	No
8	Over all Suppliers Risk assessed in assessment period?	Low

Date: 01/04/2026
Place: India

Avant India Private Limited

Policy Document	Policies	Rev. No. 01
Doc. No. AIPL-001		Date: 01-04-2026

Due Diligence and Risk Assessment Report - Key Performance indicators for Human rights

Sr#	Objects (KPI's)	Outcome	Results
1	**Investment and Procurement Practices**		**Low Risk**
	Any suppliers and contractors found violation human rights at workplace?	No	
	Employees are trained on aspects of human rights that are relevant to operations?	Yes all employees are trained twice in a year on Human rights aspects.	
	Any Sourcing from Conflict affected and High-Risk Areas in Assessment year?	No sourcing from CAHRA's	
2	**Non-Discrimination**		**Low Risk**
	Total number of incidents of discrimination and actions taken.	No discrimination incidents in last one year	
3	**Freedom of Association and Collective Bargaining**		**Low Risk**
	Operations identified in which the right to exercise freedom of association and collective bargaining may be at significant risk, and actions taken to support these rights.	The company has open door management principle for any individual	
4	**Child Labour**		**Low Risk**
	Operations identified as having significant risk for incidents of child labor, and measures taken to contribute to the elimination of child labor.	The entity has not hired any child labour during assessment period and no indirect child labour abuse observed	
5	**Forced and Compulsory Labor**		**Low Risk**
	Operations identified as having significant risk for incidents of forced or compulsory labor, and measures taken to contribute to the elimination of forced or compulsory labor.	No incident of any forced or compulsory or bonded labour observed during interaction with employees. No such incident reported in suggestion/complaint register.	
6	**Security Practices**		**Low Risk**
	Percentage of security personnel trained in the organization's policies or procedures concerning aspects of human rights that are relevant to operations.	Security guards are used only for the protection of company assets and never used to suppress or bully any individuals. They are also trained on Human Right aspects.	
7	**Indigenous Rights**		**Low Risk**
	Total number of incidents of violations involving rights of indigenous people and actions taken.	No violation or threats incident observed during assessment period.	
Conclusion	KPI's reviewed and verified by the compliance head and management of the company found all Key Indicators are Low Risk.		

Date: 01/04/2026 and Place: Mumbai

Date: 01/04/2026
Place: India