Name of Company Name: Gandhi Enterprises Co., Ltd.

Document Name: Policy Statement on Supply Chain Policy

Document Number: GE - POL - 021

Document Next Review (DDMMYYYY): 31st December, 2022

Prepared By: Growlity, Inc.



1249/128 Charoenkrung Rd., Gems Tower 12/F., Suriyawongse, Bangrak, Bangkok 10500, Thailand

Policy Statement on Supply Chain Policy

The policies relating to this section are part of the Business Policies adopted by Gandhi Enterprises Co., Ltd. and are presented below for reference:

Gandhi Enterprises Co., Ltd. is a gemstone trader in Bangkok, Thailand. This policy confirms Gandhi Enterprises Co., Ltd.'s commitment to respect human rights, avoid contributing to the finance of conflict and comply with all relevant UN sanctions, resolutions and laws.

Gandhi Enterprises Co., Ltd. is a member of the Responsible Jewellery Council (RJC). As such, we commit to proving, through independent third-party verification, that we:

- Respect human rights according to the Universal Declaration of Human Rights and International Labour Organization Fundamental Rights at Work;
- Do not engage in or tolerate bribery, corruption, money laundering or finance of terrorism;
- Support transparency of government payments and rights-compatible security forces in the extractives industry;
- Do not provide direct or indirect support to illegal armed groups; and
- Enable stakeholders to voice concerns about the jewellery supply chain.
- Are implementing the OECD 5-Step framework as a management process for risk based due diligence for responsible supply chains of minerals from conflictaffected and high-risk areas.

Revision 1.0 GE - POL - 021 Page 2

1249/128 Charoenkrung Rd., Gems Tower 12/F., Suriyawongse, Bangrak, Bangkok 10500, Thailand

We also commit to using our influence to prevent abuses by others. We follow our KYC policy and procedure in screening and evaluating our suppliers in order to identify risks, and installed grievance mechanism to receive concerns about our supply chain.

Regarding serious abuses associated with the coloured gemstones. We will neither tolerate nor profit from, contribute to, assist or facilitate the commission of:

- torture, cruel, inhuman and degrading treatment;
- forced or compulsory labour;
- the worst forms of child labour;
- human rights violations and abuses; or
- war crimes, violations of international humanitarian law, crimes against humanity or genocide.

We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are committing abuses described in 4 or are sourcing from, or linked to, any party committing these abuses.

Regarding direct or indirect support to non-state armed groups.

We only sell coloured gemstones that are fully compliant with the Certification and, as such, will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring coloured gemstones from, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates who illegally:

 control mine sites, transportation routes, points where coloured gemstones are traded and upstream actors in the supply chain; or

1249/128 Charoenkrung Rd., Gems Tower 12/F., Suriyawongse, Bangrak, Bangkok 10500, Thailand

 tax or extort money or coloured gemstones at mine sites, along transportation routes or at points where coloured gemstones are traded, or from intermediaries, export companies or international traders.

We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are sourcing from, or are linked to, any party providing direct or indirect support to nonstate armed groups

Regarding public or private security forces

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

Regarding bribery and fraudulent misrepresentation of the origin of coloured gemstones

We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of coloured gemstones, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of coloured gemstones.

Regarding money laundering

We will support and contribute to efforts to eliminate money laundering where we identify a reasonable risk resulting from, or connected to, the trade, handling, transport or export of coloured gemstones.

1249/128 Charoenkrung Rd., Gems Tower 12/F., Suriyawongse, Bangrak, Bangkok 10500, Thailand

Ensure the product are conflict free, and monitor that the coloured gemstones do not stem from countries of conflict and that the gemstones were not mined using child or child labor or in violation of environmental law regulations

Perform training sessions with relevant employees and partners and encourage them to raise any suspicious relation and/or transactions to management and/or compliance officer. We require our employees, consultants, and business partners to comply with our policy, and will - wherever possible- enforce it

By,

Gandhi Enterprises Co., Ltd.

Date: - 01/01/2022