



ATIT DIAMOND CORPORATION

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Dear Customer / Supplier,

Sub: Implementation of RJC's Code of Practices

1. The Responsible Jewellery Council (RJC) is a not for profit organization with the following mission:
"To advance responsible ethical, social and environmental practices, which respect human rights, throughout the diamond and gold jewellery supply chain, from mine to retail"
2. RJC's "Code of Practices" defines responsible ethical, human rights, social, and environmental practices, applicable to all RJC members.
3. *ATIT DIAMOND CORPORATION* has become a member of RJC and is fully committed to the Code of Practices.
4. In line with the compliance requirement of RJC System and applicable law, we need to collect specific information about our suppliers and customers. We request you to provide us a few basic details of your company. It would be highly appreciated if you can complete the enclosed form and return back to us.
5. We also would like to strongly encourage all our business partners to follow and implement the various requirements of the RJC system. You can find more information about the Program on the internet site <http://www.responsiblejewellery.com>. Please feel free to get in touch with us in case you need any assistance.
6. We would like to strongly encourage all our business partners to follow and implementing the various requirements of RJC Code of Practices (COP).
7. We would be happy to conduct a training program for your team, on the RJC requirements and steps to be taken for implementation.

We look forward to your co-operation in adopting the standard and ensuring that the entire diamond industry is seen as a role model in setting high standards with respect to business, social and environmental responsibilities.

Thanking you,
Yours truly,

A handwritten signature in blue ink, appearing to be the initials 'JD' or similar, written in a cursive style.

Policy – Supply Chain

This Policy shows Atit Diamond Corporation commitment and its expectations for its product suppliers regarding actions to address Conflict Minerals and compliance with OECD requirement.

Atit Diamond Corporation expects its suppliers to have in place policies and due diligence measures that will enable us to reasonably assure that products and components supplied to us containing **conflict free minerals and metals**.

We being a responsible company, Atit Diamond Corporation supports the goal of the Dodd-Frank Act of preventing illegitimate armed groups of all countries from benefitting from the sourcing of Conflict Minerals and metals from all region.

Atit Diamond Corporation 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 minerals contained in the products they manufacture and sell to Atit Diamond Corporation.

Atit Diamond Corporation reserves the right to evaluate the extent to which a supplier has failed to reasonably comply with this Policy and seized business relationship.

Atit Diamond Corporation reserves the right to request additional documentation from its suppliers regarding the origin of any Conflict Minerals/metals included Diamond/Gold/Silver/Coloured Gem stone/PGM in any products sold to Atit Diamond Corporation.

Suppliers who do not reasonably comply with this Policy shall be reviewed by Atit Diamond Corporation's for future business.

Policy – Sourcing

Atit Diamond Corporation is committed to ensuring that our supply chain is free of any material 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.

Atit Diamond Corporation 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/refiners/traders.



We shall always set reasonable efforts to source Conflict Minerals from smelters and refiners validated as being DRC 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 minerals compliance programs.

Policy – Due Diligence

The company shall always undertake to ensure that the extraction and trade of mineral ores containing tin, tantalum, tungsten, gold, silver, PGM, diamonds and coloured gemstone support peace and development, not conflict.

Atit Diamond Corporation 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.

Currently Atit Diamond Corporation has 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.

Grievance Mechanism

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

Email: usha@atitdiamond.com

Reports can be made anonymously and will be kept confidential to the fullest extent 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.

Our suppliers are encouraged to contact usha@atitdiamond.com if they wish to seek guidance on the application of this Policy.

Date : 08/12/2021

Place : USA

Supply chain due diligence and Risk Assessment Report

Atit Diamond Corporation has done the supply chain due diligence and risk assessment, Over all risk for the all suppliers are found low and none of suppliers found free from any business relationship with conflict affected and high risk areas. Supplier risk assessment report available with compliance team.

Date: 08/12/2021

Place: USA

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