

Date of Review: 3rd January 2025

Recorded by: Anand Acharya

In attendance:

Sr. No.	Name	Title
1	Mr. Sohil Shah	Partner
2	Mr. Krupesh Shah	Partner
3	Mr. Anand Acharya	Group Compliance Officer & HR
4	Mr. Rakesh Darji	AML Compliance Officer
5	Mr. Vipul Bavlawala	MR
6	Mr. Ankit Shah	Compliance Co-Ordinator
7	Mr. Dinesh Solanki	Partner (Ideal Gems)
8	Mr. Krunal Jain	Health & Safety Compliance Officer
9	Mr. Piyushkumar Shah	Manager

ITEM 1: Review of the Policy for current adequacy and the need for changes to it.

After review by the Management and the Compliance Officer, it was observed and concluded that the policies and procedures that exist are all appropriate. They do not require any changes.

☒ Policy reviewed accepted as it is.

☐ Policy needs revision. Following changes are recommended:

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ITEM 2: Review of business practices and responsible sourcing.

The policies and procedures related to the entity's business practices were thoroughly reviewed and discussed upon. Key matters touched upon during the discussion included:

1. The steps taken by the entity for respecting and upholding human rights of all individuals and stakeholders that are directly or indirectly engaged and/or affected with the company's business activities. They were found to be satisfactory.
2. Discussions were made upon the working hours, remuneration of the workers and employees and were found to be appropriate and in accordance with company policies and applicable laws and regulations.
3. Discussions were further undertaken for matters related to Discipline, grievance procedures and non-retaliation, child labour, forced labour, non-discrimination. No gaps / breaches were identified.
4. Thereafter, discussions were initiated upon the entity's practices for management of hazardous substances, wastes and emissions and it was noted that the same has been handled in accordance with the applicable laws and regulations. Attempts made and initiatives carried out for optimizing the use of energy and natural resources were acknowledged and it was decided to further continue the same to minimize the overall impact of entity's business activities on environment.
5. Further, discussions were undertaken with regard to the practices carried out for product disclosures and it was established that adequate and appropriate disclosures were made. No gaps / breaches identified.
6. Reports and certificates related to the Kimberley Process Certification Scheme and WDC System of Warranties were reviewed and were found to be in order.

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7. Efforts made for responsible and ethical sourcing, tasks undertaken for compliance with OECD guidelines for responsible sourcing were discussed and were found to be satisfactory.

ITEM 3: First Party Workbook Report.

After review by the Management and Compliance Officer. It was observed that the internal latest audit workbook is appropriate as per the guidelines. There is no gap as per policy and procedure.

ITEM 4: Review of the effectiveness of safety and hygiene in place.

We have appropriate safety and hygiene system but we should always positively look forward for necessary upgradation from time to time.

ITEM 5: Review of the effectiveness of training and training programs in place.

We have regularly provided relevant trainings based on company policy and procedure, we shall constantly put in efforts for the regular amendment as required due to any changes in the laws and continuous upgradation of the training material so that the interest of the employees can be kept high and they shall always remain conscious about its effective implementation.

For Star Rays

FOR STAR RAYS

R. R. Shah

Partner



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