



Responsible sourcing - Conflict free diamond policy:

Star Rays recognises the guiding principles of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the 'OECD Guidance'). Its objective is to respect human rights and avoid contributing to finance of conflict through the mineral supply chain.

Star Rays recognises that the purpose of this guidance is to help all stakeholders in the supply chain respect human rights and avoid contributing to finance of conflict through their sourcing decisions, including the choice of our suppliers. By doing so, this will help all stakeholders contribute to sustainable development and source responsibly from conflict affected and high-risk areas, while creating the enabling conditions for constructive engagement with suppliers.

Star Rays is committed to source responsibly and avoid sourcing from conflict affected and high-risk areas. This is emphasized amongst others through policies on human rights, AML/CFT, bribery, facilitation, child labour, and forced labour. Star Rays support transparency of government payments and rights-compatible security forces in the extractives industry. Star Rays do not provide direct or indirect support to illegal armed groups. Management encourages employees to bring any breach in human rights, contribution to conflict, areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure, civil wars, illegally armed groups and/ or widespread violence to the attention of the management and to relevant authorities for follow up. Star Rays implements the OECD five-step framework as a management process for risk-based due diligence for responsible supply chains of minerals from conflict-affected and high-risk areas. Management will undertake any remedial action in such instances.

Star Rays will neither tolerate nor profit from, contribute to, assist or facilitate the commission of:

- a. torture, cruel, inhuman and degrading treatment;
- b. forced labour;
- c. child labour;
- d. human rights violations and abuses; or
- e. war crimes, violations of international humanitarian law, crimes against humanity or genocide.

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

Prior to sourcing, **Star Rays** will undertake checks to ensure there has been no involvement in human rights abuses or contribution to conflict by any means. **Star Rays** only buy or sell diamonds that are fully compliant with the Kimberley Process Certification Scheme and, as such, will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring diamonds from, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates who illegally:

- a. control mine sites, transportation routes, points where diamonds are traded and upstream actors in the supply chain; or



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

Star Rays 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 non-state armed groups as described in above mentioned paragraph.

Star Rays 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 as mentioned in above paragraphs.

By adhering to the above, **Star Rays** supports, promotes respect for and protects the fundamental Human Rights and avoidance of contribution to conflict expressed in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Kimberley Process and the Human Rights Due Diligence requirements set out under the United Nations Guiding Principles Framework.

Star Rays encourage and endeavour to promote such practice within the entire supply chain.

What are Conflict Diamonds?

The United Nations defines conflict diamonds as "Diamonds that originate from areas controlled by forces or factions opposed to legitimate and internationally recognized governments, and are used to fund military action in opposition to those governments, or in contravention of the decisions of the Security Council."

Kimberley Process:

To combat conflict diamonds and to standardize mining practices, the international community established a policy in 2000 which was a zero-tolerance policy against conflict diamonds and known as Kimberley process

We support the Kimberley process, which is an international process to track diamonds.

We only work with reputable suppliers who value conflict-free sourcing and ethical business practices.

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

The Due Diligence Guidance for minerals may be used by any company potentially sourcing any minerals or metals from conflict-affected and high-risk areas, and is intended to cultivate transparent, conflict-free supply chains and sustainable corporate engagement in the minerals sector.

**Grievance:**

In case of any grievance observed across the supply chain and need to intimate us, kindly contact us as per below mentioned details:

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Tel: +91 22 40304444

Email: vikesh@starrays.com

Important links:

OECD Due Diligence Guidance <https://www.oecd-ilibrary.org/sites/9789264252479-en/index.html?itemId=/content/publication/9789264252479-en>

Kimberley Process www.kimberleyprocess.com

World Diamond Council
<https://www.worlddiamondcouncil.org/downloads/WDC%20SoW%20Guidelines.pdf>