

Ethical Business Practices and Responsible Sourcing Policy

Tova Diamonds Limited

Introduction

At Tova Diamonds, we believe that all companies have an important role to play in promoting sustainability and we therefore strive to operate our business in a way that respects people and the planet.

This policy outlines our commitment to ethical business practices and responsible sourcing, as well as the principles that underpin our expectations of suppliers, sub-contractors and other business partners.

Human and Labour Rights

We are committed to respecting all human rights in our own operations and business relationships in accordance with the [Universal Declaration of Human Rights \(UDHR\)](#), the [UN Guiding Principles on Business and Human Rights](#) and relevant conventions of the [International Labour Organization \(ILO\)](#). Our human rights policy covers the following key commitments:

- All forms of violence and harassment in the workplace are prohibited, including but not limited to corporal punishment; harsh or degrading treatment; sexual or physical harassment; mental, physical, verbal or sexual abuse; retaliation; coercion; and intimidation. Both direct and indirect harassment in any form is not acceptable in workplace facilities. We commit to ensuring that our employees are not subjected to harassment or violence, or threatened with these towards themselves, their family or colleagues.
- To never engage in or knowingly support child labour (including the worst forms of child labour) as defined by International Labour Organisation (ILO) conventions 138 and 182;
- To never engage in or knowingly support forced labour as defined by International Labour Organisation (ILO) convention 29, including bonded labour, deceptive recruitment, human trafficking and indentured or involuntary prison labour.
- To provide a safe and healthy working environment for all employees;
- To treat employees with dignity and respect, which includes:
 - Ensuring fair and transparent discipline and grievance procedures.
 - Recognising and respecting the right of all employees to associate freely and enter into collective bargaining.
 - To provide all employees with fair terms of employment and legally mandated benefits.
 - To prohibit all forms of discrimination, including but not limited to discrimination based on race, colour, ethnicity, caste, national origin, religion, disability or genetic information, gender, sexual orientation, union membership, political affiliation, marital status, parental or pregnancy status, physical appearance, HIV status, age or any other personal characteristic unrelated to the inherent requirements of the work.
- To promote human rights in our dealings with our suppliers and other business partners.

Bribery and Corruption

We prohibit bribery and corruption in all business practices and transactions carried out by employees and by agents acting on our behalf. For the purpose of this policy, bribery is defined as giving, offering or receiving any undue advantage to or from:

- A public or government official;
- A political candidate, party or official; or
- Any private sector employees, directors or officers, or their agents or representatives.

Anti-Money Laundering and Finance of Terrorism

We commit to not engaging in or contributing to money laundering or the finance of terrorism. Tova Diamonds has implemented Anti-Money Laundering (AML) and Know Your Counterparty (KYC) procedures to:

- a. Establish the identity of all counterparties;
- b. Verify that counterparties and, if applicable, beneficial owners are not named on relevant government lists for individuals or organisations implicated in money laundering, fraud or involvement with prohibited organisations and/or those financing conflict;
- c. Maintain an understanding of the nature and legitimacy of the businesses operated by counterparties and;
- d. Monitor transactions for unusual or suspicious activity.

Product Disclosure

We will not knowingly make any untruthful, misleading or deceptive representation, or make any material omission in the selling, advertising or marketing of jewellery products and materials.

Conflict Diamonds

We will not knowingly buy or sell Conflict Diamonds¹ and require that all of our suppliers of diamonds comply with the requirements of the Kimberley Process Certification Scheme (KPCS) and World Diamond Council System of Warranties (SoW).

Conflict-Affected and High-Risk Areas²

We commit to managing our supply chain responsibly, in particular when sourcing minerals from Conflict-Affected and High-Risk Areas (CAHRA).

Through this policy, we commit to refraining from any action which contributes to the financing of conflict, including through compliance with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions.

To this end, we have implemented a due diligence process for our minerals supply chains, with the goal to prevent, identify, and manage risks associated with the extraction, trading, handling and exporting of minerals from CAHRAs. We will carry out due diligence based on the 5-step framework of the [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas \(OECD Guidance\)](#), and will focus our efforts on preventing, identifying and managing, at a minimum, the following risks, as described below if sourcing from CAHRAs in accordance with Annex II of the OECD Guidance:

- We will not tolerate serious human rights abuses, such as forced labour and the worst forms of child labour, as associated with the extraction, transport or trade of minerals;

¹ Rough diamonds used by rebel movements or their allies to finance conflict aimed at undermining legitimate governments, as described by the UN Security Council (UNSC) and as recognised by the UN General Assembly

² This applies to all of our jewellery materials and is in addition to our specific commitment with regards to non-sourcing of 'conflict diamonds'.

- We will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals;
- We will take mitigative actions to address risks associated to the contracting of public or private security forces;
- We will take mitigative actions to address risks associated with bribery and fraudulent misrepresentation of the origin of minerals;
- We will take mitigative actions to address risks associated with money laundering and non-payment of taxes, fees and royalties due to governments.

Grievance procedure

Tova Diamonds has established this procedure to hear any concerns or complaints from interested parties and stakeholders regarding its supply chain and business practices.

Concerns can be raised by interested parties via email using the following contact information:

Email: enquiries@tovadiamonds.com

On receiving a complaint, we will aim to:

- contact you as soon as possible to gather more information regarding your grievance, where applicable;
- decide who is the appropriate person internally to handle the grievance, or help redirect you to another entity, such as a relevant company, industry body or other organisation;
- identify any actions we should take (if any), or monitor the situation;
- advise you of any decisions or outcomes; and;
- keep records on grievances received and the internal process followed to address such grievances, for at least five years.

Tova Diamonds expects all of its employees, suppliers and subcontractors to take steps to ensure that this policy is adhered to.