



ETHICAL BUSINESS POLICY

Ethical Policy, Version #01 dated 15th October, 2025

Legislation and Regulations

- a. POSITIVE JEWELLERY TRADING LLC shall operate in compliance with relevant national and international legislations / regulations as applicable in the countries in which they operate.
- b. All personnel are expected and directed to comply with all applicable laws and regulations as well as all internal POSITIVE JEWELLERY TRADING LLC rules and policies relating to their business activities.
- c. It is the responsibility of personnel to know and understand legal, regulatory and internal requirements as they apply to their jobs.
- d. Compliance team maintains the list of applicable legal and regulatory requirements and same is followed for compliance on day-to-day basis. Necessary records of requirements and its compliance is maintained.

Money Laundering, Terrorism Financing, Other Financial Offences

- a. POSITIVE JEWELLERY TRADING LLC recognizes the fact that entities in the gems and jewellery sector must take on the onus of analysing their potential vulnerabilities to money laundering and implement specific steps that are required for protection against abuse by criminals.
- b. POSITIVE JEWELLERY TRADING LLC shall act in accordance with national laws with respect to auditing of its financial accounts and maintaining internal controls as guided by various regulations. Following acts and international guidelines is considered while establishing company level policies.
 - UAE Go AML
 - FATF 40 Recommendations and 8 special recommendations
- c. It is the responsibility of concerned personnel to know and understand the relevant money laundering / financial offences related legal, regulatory and internal requirements as they apply to their jobs. Ignoring or not reporting suspicious activity that appears to be questionable may also be considered as a violation of the Business Principles, depending on the seriousness of the non-conformance.
- d. Compliance officers ensure all the critical steps such as KYC & KYS, Identification of suspicious transaction, reporting to management and record keeping as required by the



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local act and legislations are complied with.

- e. Detailed AML policy can be shared on request of the supply chain partner after consent from the management.

Anti-Bribery and Facilitation Payment Policy:

- a. The POSITIVE JEWELLERY TRADING LLC shall ensure complete prohibition of Bribery and facilitation payment across organization and in all the entities.
- b. POSITIVE JEWELLERY TRADING LLC will not offer, accept or countenance any payment, gift of kind, hospitality, expense or promises such that may compromise promises of fair competition.
- c. POSITIVE JEWELLERY TRADING LLC shall prohibit bribery and facilitation payment and shall comply with various rules and regulations of the land.

Disclosure of Precious Metal

- a. The POSITIVE JEWELLERY TRADING LLC shall provide appropriate disclosure of gold purity, weight of the metals processed by them.
- b. Supply chain shall be provided with fire assay report for fine metal in case industrial large size bars and in case of commercial bars purity certificate with unique bar number is provided (these bars are DGD/ LBMA regulated refinery bars)

Gold & Silver Group of Metal Sourcing Policy (As per DRC)

Our Company is concerned about environment and social impacts of irresponsible mining.

We at POSITIVE JEWELLERY TRADING LLC. shall ensure that all our gold suppliers are in compliance with gold sourcing guidelines (Dodd- Frank rules, DRC, MOE & other applicable legislation).

Further, we are committed to ensure that sourcing of gold and precious metal products and commercial scraps thereof, are under the highest Social, Human right and Environmental standard cautions of trade.

We have published our supply chain policy on the web site of the company

Supply Chain Management / Best Endeavours

The management of POSITIVE JEWELLERY TRADING LLC is committed to take appropriate action to use best endeavours to ensure that the suppliers and contractors are committed for compliance to International Social Standards such as RJC.



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Employment

- a. Compliance is always required, with applicable national and, where appropriate, international laws / regulations with respect to employment and labor.
- b. The POSITIVE JEWELLERY TRADING LLC shall not require Staff to work for more than the national limit of hours in a week on a regular basis.
- c. The POSITIVE JEWELLERY TRADING LLC shall ensure that wages and benefits for a standard working week shall meet at least national minimum standards.

Health and Safety

POSITIVE JEWELLERY TRADING LLC recognizes the need to develop a sustainable, value-creating business and is committed to the following:

- Any adverse impact of our business processes on those who carry them out shall be identified and eliminated. Towards this end, we will systematically review our operations to identify sources of health and safety related risks.
- This review will use appropriate standards as required by prevailing laws, expert opinion and our knowledge of best practices.
- The review will lead to formulation of clearly described work practices and drills.
- All workplaces will be constructed to meet safety standards with local regulations as the minimum standards that will be applicable

Non-Discrimination, Disciplinary Practices

- a. Discrimination can mean distinction, exclusion or preference.
- b. Any form of discrimination relating to the hiring, discharge, pay, promotion and training of employees on the basis of race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, HIV status, Migrant status, membership of worker representative bodies, political affiliations, or any criteria that are unlawful is strongly discouraged by the POSITIVE JEWELLERY TRADING LLC Any such reported incidents will be viewed as a serious violation of this Business Principles.
- c. We shall at no time condone the use of corporal punishment or other forms of mental or physical coercion.
- d. We encourage all personnel to voice concerns promptly, if they have a genuine reason to believe that a policy, POSITIVE JEWELLERY TRADING LLC operation or practice is or will likely be in violation of any law, regulation or internal rule or policy, including this Business Principles.



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Child Labour

- a. No form of child labour should be employed at any of the facilities of the POSITIVE JEWELLERY TRADING LLC Unless local laws stipulate a higher age, the minimum age for employment that will be applicable is fifteen (As per ILO Convention No. 138).
- b. As per our POSITIVE JEWELLERY TRADING LLC policy no child labour or young labour will be employed.
- c. POSITIVE JEWELLERY TRADING LLC will implement suitable policy and procedures to verify the age proof all new employees joining the organization.

Forced Labour

- a. The management of POSITIVE JEWELLERY TRADING LLC is fully committed to ensuring that forced or involuntary labour is not practiced in any form at any of its facilities. Any reported incidents relating to forced labour will be considered as a serious violation of this Business Principles.
- b. The following definitions will be applicable:
 - The Universal Declaration of Human Rights that states that 'No one shall be held in slavery or servitude'
 - ILO Convention 29, which defines forced or compulsory labour as 'all work or service which is extracted from any person under the menace of any penalty, and for which they said person has not offered himself voluntarily'

Human Rights

- a. All employees in the Company's facilities will be treated with equality, respect and dignity.
- b. The company will not interfere in the right of employees to Observe tenets practices based on caste, race, national origin, gender, religion or disability, union membership or political affiliation
- c. The Company strongly discourages any form of sexually coercive, threatening, abusive or exploitative behavior.
- d. Any reported incidents relating to direct or indirect physical, sexual, racial, religious, psychological, verbal, or any other form of harassment or abuse, or any other form of intimidation or degrading treatment will not be tolerated by the company.
- e. Our Human Right Policy is in line with The UN Guiding Principles on Business and Human Rights (UNGPs).
- f. Company has well defined human right due diligence frame work which ensure due



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diligence across the organization for various aspects of human right violation.

- g. Company has detailed procedure on the grievance handling and whistle blower, which has been published separately on the company website.
- h. Company will ensure non retaliation of employees who has initiated the grievance or whistle blowing and protected from all forms of discrimination in the organization.

Environment Protection

POSITIVE JEWELLERY TRADING LLC is committed to effective environmental management as one of its important corporate priorities, and will focus on the following initiatives:

- Compliance with all applicable environmental laws and regulations
 - The impact of each of our operations/ activities on the environment will be systematically assessed for compliance with appropriately defined standards and reviewed periodically to mitigate or eliminate such impact.
 - Improvement of employee & supplier's environmental awareness and performance through detailed policies and procedures, training, and recognition of excellence.
- a. **Environmental Management Systems:** The Group maintains environmental controls and procedures to manage resource use, emissions, and waste in line with applicable legal and RJC COP 2024 requirements.
- b. **Legal Compliance:** Environmental practices, including water treatment and waste disposal, are implemented in compliance with applicable environmental laws, permits, and regulatory obligations.
- c. **Water Stewardship:** We are a small office operation and does not have any heave water usage, however precaution are taken for water preservation and awareness is created for water management.
- d. **Effluent Treatment & Discharge** we are service provider and we do not generated any hazardous waste however , waste of packing material and other office wastes are handled appropriately and same is handover to license/ authorized agency for further treatment.
- e. **Resource Efficiency** Company promotes efficient use of natural resources by adopting water- efficient systems, preventive maintenance, and environmentally responsible technologies.
- f. **Climate & Energy Management – GHG Measurement :** Greenhouse gas emissions from **Scope 1 and Scope 2 sources** are periodically calculated and monitored in alignment with



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recognized methodologies. Our Carbon Footprint review for the calendar year 2025 is done and copy of carbon baseline report shall be shared to supply chain partner on request **(please send email to contact details mentioned at the end of this policy)**

- g. **Climate Action & Continuous Improvement:** Emission reduction targets and energy-efficiency initiatives shall be identified after doing the baseline study based on 2025 data.
- h. **Pollution Prevention & Land Protection:** We are small office of gold refining service provider and our activities do not involve land contamination, however we ensure safe handling, storage, treatment, and disposal of packing material and other consumables used in our premises.
- i. **Waste Management** We are a Small office of refining service provider and does not generate any hazardous waste ,however we ensure segregation of applicable Solid, and liquid waste and disposed of through authorized methods in accordance with statutory and RJC COP expectations.

Product Security

POSITIVE JEWELLERY TRADING LLC is committed to providing safety of products throughout its supply chain by following precautions as mentioned below

- a. Each -and- every stage of product processing it is covered through blanket insurance
- b. Suitable safeguarding and storage are ensured at all stage with the help of safes
- c. We are taking at most care to ensure safety of visitors, Customers and interested parties, suitable arrangements such as CCTV, Multi-level entry doors and other electronic intelligence.
- d. All the concern persons are trained on relevant safety and security procedures to be always followed.

Provenance claim

POSITIVE JEWELLERY TRADING LLC is not making any provenance claim for its services

Public Grievances against social & Ethical compliance of the Positive Jewellery Trading LLC.

If you come across any instance of non-compliance or specific deviation from our ethical policy, financial non-compliance, Social issue, Human right deviation and or HSE issues pertaining to following

- 1) bribery, facilitation payment, Product security, OCED non-compliance and or reporting any



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supply chain related issues

- 2) Human Right violation in our premises or in our supply chain
- 3) Concerns of Health, Safety and Environment
- 4) Supply chain related grievance

Please feel free to reach us at below mentioned contact details Our Annual OECD compliance report has been published on our company website

Sr No.	Mode	Details
(I)	By Compliance Officer	Contact: Mr. Vishal Thakkar
(ii)	By Email	compliance@positivejewellerytrading.com