

POLICY DATE
Implemented on 18th January 2022

Management Controlled Copy
Authorized by Director

RUMA HK LIMITED

Ethical Business Policy Document

DOCUMENT APPROVAL

Applicability

This document shall be applicable from January 18th, 2022, and subject to at least annual review or else as and when any activity of the company changes or any incident reported by the business partners pertaining to applicability and scope of this document. This document shall be endorsed by the senior management.

About US

RUMA HONGKONG LIMITED has a commitment to provide on time Deliveries for your orders together with providing consistency in Quality. Our motto is to give our customers a high standard of Assortment with strict Quality control and at the same Time maintain a top-class Reputation amongst all our business associates.

We strive to build strong business partnership with all our customers by not only being their supplier of diamonds but by joining hands with them and treating them as our valued customer by providing them with competitive prices.

With great amount of Experience in this field we are a highly reputable company and one of the major suppliers of natural diamonds for rounds and fancies.

We majorly carry White (Full cut and single cut), TTLB, TLC and Black diamonds in a range of Sizes from 0.003ct up to 5ct and 0.30ct – 5.00ct in certified diamonds (GIA, IGI, HRD).

Scope of material and Product

Scope of material is polished diamonds/Laboratory Grown Diamonds

Entities

Ruma HK Limited is Hong Kong based Polished diamonds trading company with registered address as Unit 1601-A, Hart House, 12-14 Hart Avenue, Tsim Sha Tsui. Kowloon, Hong Kong and having around 04 employees.

This Policy Document (Ruma-RJC-001) is to define rules and regulations and way of working for the operations and activities of the company in relation to the requirements of Responsible Jewellery council and ethical business practice.

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Place: Hong Kong

Policies mentioned in this document shall supersede, If any contradiction in entity level policy and this document.

The contents of this document have been reviewed and approved by Director and subject to Annual review.

All internal and external stakeholders of the company are required to be familiar with this document and follow the risk-mitigating measures identified in this document.

Management is responsible to make changes / revisions to this document and all business partners and stakeholders are advised to report any issues violating this document.

Policy on Responsible Jewellery Council

Ruma HK Limited is in diamonds and jewellery supply chain mainly in polished diamonds. We have trading facility in Hong Kong. Ruma HK Limited shall be member of the Responsible Jewellery Council (RJC).

The RJC is a standards-setting organization established to advance responsible ethical, human rights, social and environmental practices throughout the gold, silver, platinum group metals, diamond and coloured gemstone jewellery supply chain. The RJC has developed a benchmark standard for the jewellery supply chain and credible mechanisms for verifying responsible business practices through third-party auditing.

As an RJC member, we commit to operating our business in accordance with the RJC Code of Practices and Laboratory Grown Material. We commit to integrating ethical, human rights, social and environmental considerations into our day-to-day operations, business planning activities and decision-making processes.

Policy on Corporate social Responsibility

While we run our business based on the expectations of our diverse stakeholders, we also understand the importance of contributing to making the world a better place. At Company, we strongly believe in the concept wherein the company contributes to building economic, social and environmental imperatives.

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Corporate Social Responsibility (CSR) aims to contribute to societal goals of a philanthropic, activist or charitable nature or by engaging in or support volunteering or ethically oriented practices.

Our CSR Policy aims to the betterment of a sustainable society and this commitment is ingrained in our core values. We aim to demonstrate these through our actions governed by the CSR policy. This policy applies to our Company and its all activities and may also refer to our suppliers and partners.

Policy on Environment/Social and Governance

Business Ethics and Transparency

- We will conduct our operations in an open, honest and ethical manner.
- We will ensure that all our operations are legitimate.
- We undertake to keep every partnership and collaboration open and transparent.
- We recognize the importance of protecting all our human, financial, physical, informational, social, environmental and reputational assets
- We will advise our partners, contractors and suppliers of our CSR Policy and will work with them to achieve consistency with the policy

Environment Health And Safety

We are committed to provide a safe and healthy work environment and will not compromise the safety of any individual.

We recognize that environmental pollution prevention, biodiversity and resource conservation are key to a sustainable environment and will integrate the same into our business practices.

All employees and contractors are responsible and accountable for contributing to a safe working environment, for fostering safe working attitudes and for operating in an environmentally responsible manner.

Governance

Company will undertake its CSR activities as approved by the CSR Committee, through a registered trust or society. The Company will assist the CSR Committee to identify the areas of CSR activities, programs and execution of initiatives as per the guidelines defined. The surplus funds if any arising out of the CSR activities will not form part of the business profit of the Company. The surplus funds will be used in the development of CSR projects in the following

year. It will be mandatory for (Company) to disclose its CSR Policy, programs/projects undertaken, and the expenditure made towards CSR activity.

Whistle-Blower Policy

The Company has a set policy and Procedure document and firmly believes that it should be implemented in a true spirit with the involvement of all stake holders. Further, the company shall always involve all stake holder in the process of continues improvement and welcome reporting of any incident or observation of breach of policy and procedure from any third party of stake holder. At the same time company shall always believe that any person who reports the breach incident or observed any violation of policy should be provided adequate immunity against any adverse impact on his job or any threat to his/her life or any form of harassment and torture.

The company shall always maintain the confidentiality of the whistle blower and shall not disclose identity of the whistle blower without written consent from the whistle blower. The company shall always ensure that the person who has reported incident of violation for policy and procedure shall not be penalized or harassed or torture or threaten by any individual.

Business policies of company assure that all employees or third party who comes forward in good faith to report issues, that they will be treated fairly and respectfully. While all efforts will be taken to protect the anonymity of employees as far as practicable, any form of retaliation.

Against any such individuals, assuming they have not been involved in the violation will not be tolerated.

Company encourages employees or any third party to voice concerns promptly, if they have a genuine reason to believe that a policy, company operation or practice is or will likely be in violation of any law, regulation or internal company rule or policy, including this. In case of any incident with the Whistle-Blower he/she can report to entity on following number & Email.

TEL: +852 60604702, +852 54833913

FAX: **:** +852 23202986

contact@rumadiamonds.com

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

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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 if they wish to seek guidance on the application of this Policy.

Conducting Business Ethically, with Integrity and in Fairness/Complying tracking Requirements

Ensuring that all business activities are conducted in an honest, ethical, professional and accountable manner is fundamental to the core philosophy of our company. Ruma HK Limited committed to comply with ethical business practice and most recent Responsible jewellery council code of practice. The senior management shall carry our at least annual review during and self-assessment and submit the report to the management team.

RUMA HK LIMITED are committed to combating dishonesty and fraud in all business transactions in order to maintain and enhance consumer trust in, and the reputation of the diamond industry.

The entity of the RUMA HK LIMITED shall strive to get similar commitment from their business partners. The company is committed to maintaining the highest standards of financial integrity for the benefit of all our stakeholders.

All accounting records, and reports produced from those records, must be maintained and presented according to the laws of each applicable jurisdiction.

Compliance with generally accepted accounting principles in the country where the entity is incorporated and the entity's system of internal controls is required at all times.

It is the responsibility of RUMA HK LIMITED to pursue its corporate value enhancement through sound business practices. Our business activities have direct and indirect impact on the societies in which we operate, and therefore sound business practice requires that business decisions give due consideration to the interests of its stakeholders including shareholders, customers, employees, suppliers, business partners, local communities. All employees in all our entities must endeavor to conduct the business of RUMA HK LIMITED accordingly.

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In making business decisions, employees must act on an informed basis, in good faith, and in the honest belief that the action taken is in the best interest of the company.

The company has put in place programmes that monitor the effectiveness of these commitments and hence supporting all workers in this endeavor.

Modern Slavery And Human Trafficking

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It's a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

At Company, we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain.

We fully support the government's objectives to eradicate modern slavery and human trafficking.

We call upon all suppliers we engage with to influence their global supply chains by improving transparency and accountability; and together we can help the government eradicate the injustice and brutality of modern slavery and human trafficking.

We have taken concrete steps to tackle modern slavery and have set out the actions that we have taken to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking.

Company operates the following policies for identifying and preventing slavery and human trafficking in our operations:

We encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of reprisal. There are formal confidential channels in place should this be required.
Code of Conduct - our code encourages employees to do the right thing by

clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.

Sanctioning suppliers that fail to improve their performance in line with our requirements.

We require all suppliers to follow that:

- Are fully transparent, accountable and auditable and are free from ethical ambiguities.
- They don't use any form of forced, compulsory or slave labour.
- Their employees work voluntarily and are entitled to leave work.
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment.
- They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons.
- They don't require employees to surrender their passports or work permits as a condition of employment.

Policy Statement of Child Labour

a. No form of child labour should be employed at Company
b. The minimum age for employment that will be applicable is fifteen (As per ILO Convention No. 138).
c. For authorized adolescents (persons below 18 years of age but above 15 years), the entity management is responsible for providing working conditions, hours of work and wages in compliance with applicable local laws as a minimum.
d. If a child is found working at Company either own or subcontracted, the responsibility of rehabilitation will be undertaken by the management.
e. The above policies will also be applicable to all business partners.

Key Provisions for Children in Hong Kong:

- **Ages under 13:** Prohibited from employment in any economic sector.
- **Ages 13 to under 15:** May be employed in non-industrial establishments only.
- **Parental Consent:** Written consent from a parent or guardian is mandatory for children aged 13 or over to be employed.

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- **Educational Requirements:** A parent must provide the employer with evidence that the child has completed Form 3 or holds a valid school attendance certificate.
- **Industrial Undertakings:** Employment of any child under 15 in an industrial undertaking is prohibited, with the exception of preparing food for consumption and sale on the premises where it is prepared.

Legal Framework:

These provisions are outlined in Hong Kong's Employment Ordinance (EO) and the Employment of Children Regulations.

Prohibition on Hazardous Work:

The regulations are designed to prevent the exploitation of children and protect their health and well-being by restricting them from hazardous work environments.

Policy Statement of Forced Labour

The policies relating to this section are part of the Business Policies adopted by Company and are presented below for reference:

a. The management of Company are fully committed to ensuring that forced or involuntary, bonded, indentured or prison labour, is not practiced nor used in any form at any of its facilities. Company shall ensure that there is no restriction in the freedom of movement of employees and dependents. Any reported incidents relating to forced labour will be considered as a serious violation of the Business Policies.

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 the said person has not offered himself voluntarily"

Legal Provisions

- **International Law Basis:**

Hong Kong's prohibition of forced labor stems from Article 4 of its Bill of Rights Ordinance (BOR), which aligns with international human rights conventions that Hong Kong has ratified.

- **Current Legal Framework:**

The BOR, under Article 4, prohibits slavery, servitude, and forced or compulsory labor, with specific exceptions for situations like military service or detention.

Sourcing directly from Artisanal and small-Scale Mining

Artisanal and small-scale mining (ASM) refers to formal or informal operations by individuals, groups, families or co-operatives that can involve up to hundreds of thousands of miners. ASM usually uses little capital and a lot of labour and is carried out with minimal or no mechanization (although it can involve small and fully mechanized operations).

The exact definition of 'artisanal' and 'small' mining may be stated by national legislation and categorised according to, for instance, a mining organization's volume of production of ore or mineral, the size of its concession or the level of mechanization. Using best endeavors means acting honestly, reasonably and with a positive effort to perform the relevant obligation. Under this provision, it means a company's efforts to reduce or avoid the risks of harmful practices in ASM (including human rights abuses, unsafe work and environmental harm).

Vulnerable groups are characterized by their higher risk and reduced ability to cope with shock or negative impacts. Their vulnerability may be based on socio-economic condition, gender, age, disability, ethnicity or other criteria that influence people's ability to access resources and development opportunities. It is always specific to the particular location and time.

The company shall never source any material directly from Artisanal and small-Scale Mining and in case if any such material sourced, Regularly assess risks outlined in COP 7 areas (including impacts to biodiversity), and seek opportunities for ASM community development in line with COP 10 (Community development) access the risk of unsafe working condition and environmental impact.

The company shall support ASM for risk mitigation and business development plan for the ASM and the company always have a fair commercial term.

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Policy Statement Kimberley Process

The policies relating to this section are part of the Business Policies adopted by Company are presented below for reference:

a. Company are fully committed to complying with all the requirements specified in the Kimberley Process Certification Scheme and World Diamond Council's (WDC) System of Warranties Declaration.

b. The definition of 'Conflict Gemstone Diamonds' as agreed by the Kimberley Process will be adopted i.e.

"Rough diamonds used by rebel movements or their allies to finance conflict aimed at undermining legitimate Governments, as described in relevant United Nations Security Council (UNSC) resolutions in so far as they remain in effect, or in other similar UNSC resolutions which may be adopted in the future, and as understood and recognized in United Nations General Assembly (UNGA) Resolution 55/56, or in other similar UNGA resolutions which may be adopted in the future."

c. Wherever applicable, the following affirmative statement as recommended by the World Diamond Council's System of Warranties should be printed on all the invoices:

d. "The diamonds herein invoiced have been purchased from legitimate sources not involved in funding conflict, in compliance with United Nations Resolutions and corresponding national laws. The seller hereby guarantees that these diamonds are conflict free and confirms adherence to the WDC SoW Guidelines."

e. Entering into transactions involving 'conflict diamonds' or not following the System of Warranties Declaration in invoices, either knowingly or unknowingly, will be considered as a violation of the Business Policies.

f. Company ensures that concerned personnel within the organization know about government restrictions on the trade in Conflict Diamonds, the Kimberley Process Certification Scheme and the World Diamond Council System of Warranties.

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Policy Statement General Employment, Working hours, Remuneration

a. Company complies with applicable national laws / regulations with respect to employment.

b. Companyis committed to maintaining appropriate records as stipulated by the regulatory authorities for all staff employed, whether on a full time, part time or seasonal basis.

c. Company shall not require workers to work for more than the national limit of hours in a week on a regular basis, with overtime hours not to exceed the national permitted limit per week on a regular basis unless there are legal opt-outs.

d. Company shall ensure that wages and benefits for a standard working week shall meet at least national minimum standards and shall be sufficient to meet the basic needs of workers.

e. Wages shall be paid to employees on a regular and predetermined basis in a manner and location convenient to employees, accompanied by a wage slip detailing wage rates, benefits and deductions as applicable.

f. Company shall ensure that due process of wage deductions shall be followed where applicable and it shall not be binding on employees to buy provisions from the company.

g. When required, due recognition will be given to the existence, membership and lawful activities of worker representative bodies, and worker representatives will be given access to carry out their responsibilities / functions.

h. Companyis committed to addressing the legitimate grievances of its employees.

i. Company shall follow proper procedure as per law for dismissal of employees, in case the need for the same arises, and arbitrary dismissal procedures shall be avoided.

j. Information regarding applicable employment policies and working practices shall be communicated in a transparent manner to all employees.

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k. Company are fully committed to the pursuance of the provision of fair and conducive employment conditions, consistent with applicable laws and regulations.

l. The company ensure that there are equal opportunities for all individuals who are fit to work provided for all aspects of employment, including recruitment, wages, benefits, promotions, training, transfer, termination, and retirement.

Key Provisions of Hong Kong Employment Law

- **Employment Ordinance (Cap. 57)**:

This is the foundational legislation for employment contracts in Hong Kong.

- **Continuous Contract (the "418 Rule")**:

An employee is considered to be in a continuous contract if they have worked for the same employer for at least 18 hours a week for four or more consecutive weeks.

- **Statutory Minimum Benefits**:

Under the Employment Ordinance, eligible employees are entitled to certain minimum rights and benefits, including:

  - Rest days/Paid annual leave /Sickness allowance
  - Maternity and paternity leave /Paid holidays

- **Employer Obligations**:
  - **Statutory Rights**: Employers must adhere to all statutory rights and protections provided by the ordinance.
  - **Employment Contracts**: While parties can freely agree on employment terms, the Employment Ordinance takes precedence.
  - **Employees' Compensation**: Employers are required to compensate employees for any work-related accidents, which necessitates employers' compensation insurance.

- **Employee Compensation**:

The Employees' Compensation Ordinance mandates that employers compensate employees for injuries or deaths arising out of and in the course of their employment.

- **Mandatory Provident Fund (MPF)**:

Employers must contribute to the MPF scheme to provide benefits on retirement, death, or incapacity.

- **Termination Notice**:

Employment contracts must specify the required period of notice for termination.

Where to Find More Information

For more detailed information and specific guidance, you can refer to official sources like the Hong Kong Labour Department website and the full text of the Employment Ordinance on the Hong Kong e-Legislation website.

Policy Statement Money Laundering and Finance of terrorism

The policies relating to this section are part of the Business Policies adopted by Company are presented below for reference:

a. Company recognizes the fact that entities in the gems and jewelry sector have to take on the onus of analyzing their potential vulnerabilities to money laundering and implement specific steps that are required for protection against abuse by criminals.

b. Strict compliance is required at all times, with all applicable national and, where appropriate, international laws / regulations with respect to money laundering, terrorism financing, bribery, corruption, smuggling, embezzlement, fraud, racketeering, transfer pricing and tax evasion.

c. Company shall act in accordance with national laws and national / international accounting standards with respect to maintaining financial accounts of all business transactions and auditing of its financial accounts.

d. Company ensures that concerned employees know and understand the relevant regulatory jurisdiction for national and international transactions, 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 Policies, depending on the seriousness of the non-conformance.

e. Company implements a “Know your Customer” and “Know your Supplier” procedure that establishes the identity of all organizations with which it deals, have a clear understanding of their business relationships and have a reasonable ability to identify and react to transaction patterns appearing out of the ordinary or suspicious.

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Key Requirements & Procedures

- **Customer Due Diligence (CDD):**

  Institutions must verify the identity of their customers and assess the risks associated with them.

- **Suspicious Transaction Reports (STRs):**

  Financial institutions must report suspicious transactions to the Joint Financial Intelligence Unit (JFIU).

- **Physical Cash Monitoring:**

  The Customs and Excise Department (C&ED) monitors the cross-border movement of cash and negotiable instruments to prevent money laundering and terrorist financing.

Regulatory Bodies

- **Joint Financial Intelligence Unit (JFIU):** Receives and analyzes suspicious transaction reports.
- **Hong Kong Monetary Authority (HKMA):** Oversees banks and deposit-taking company to ensure compliance with AML/CFT regulations.
- **Securities and Futures Commission (SFC):** Regulates securities and futures markets, including virtual asset trading platforms, to combat financial crime.
- **Customs and Excise Department (C&ED):** Enforces regulations on the physical movement of money.

Penalties for Money Laundering

- **Maximum Penalty:** Under the OSCO and DTROP, the maximum penalty is a HK$5 million fine and 14 years' imprisonment.

Policy Statement of Freedom of association and Collective Bargaining, Discrimination and Discipline and Grievance Procedures

The policies relating to this section are part of the Business Policies adopted by Company and are presented below for reference:

a. Company will not prevent employees from associating and collective bargaining, 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, ethnicity, caste, national origin, religion, age, disability, gender, marital status, physical appearance, sexual

orientation, HIV status, Migrant status, membership of worker representative bodies, political affiliations, or any criteria that are unlawful is strongly discouraged by Company and any such reported incidents will be viewed as a serious violation of this Business Policies.

c. Company will ensure that employees who have certain life-threatening diseases or illnesses are not treated differently from other employees, and will continue to employ such personnel, as long as they are physically and mentally fit to attend to their normal job responsibilities. Individuals who are "Fit for Work" shall be accorded equal opportunities and shall not be discriminated against on the basis of factors unrelated to their ability to perform their job.

d. Company shall not use corporal punishment under any circumstances and will ensure that employees are not subjected to harsh or degrading treatment, sexual or physical harassment or other forms of mental or physical coercion, abuse or intimidation.

e. Company encourages all personnel to voice concerns promptly, if they have a genuine reason to believe that a policy, entity operation or practice is or will likely be in violation of any law, regulation or internal entity rule or policy, including this Business Policies. Company assures all employees who come forward in good faith to report issues, that they will be treated fairly and respectfully. While all efforts will be taken to protect the anonymity of employees as far as practicable, any form of retaliation against any such individuals, assuming they have not been involved in the violation, will not be tolerated.

f. Ruma HK Limited strictly prohibit all forms of discrimination, harassment and bullying and violation. No employees or visitors shall be allowed to discriminate, harassment be it verbal or physical and bullying any individual. The group requests all individual to behave respectfully and adhere to the policy.

Policy Statement of Product Integrity

a. Company are committed to complying with relevant trading standard legislation and specific national and local regulations applicable to its products.

b. The following essential Policies will be applicable in all transactions of Company involving diamonds, treated diamonds, synthetics and stimulant

- **Disclosure -** Company shall fully and accurately disclose the material characteristic of their products. All reasonable efforts shall be made to properly disclose all relevant information on the physical characteristics, such as mass/weight, cut, cut, colour, clarity or fineness, of a diamond or gold jewellery product.

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- **Misrepresentation -** No untruthful, misleading or deceptive statement, "representation" or material omission in the "selling", "advertising" or distribution of any diamond, treated diamond, synthetic, or simulant, or any gold product, shall be made by the company and its entities in any medium, including the internet
- **Diamond Quality -** The weight, colour, clarity or cut of diamonds will be described in accordance with the recognized guidelines appropriate to the particular jurisdiction.
- Full disclosure i.e. the complete and total release of all available information about a Diamond and all material steps it has undergone prior to sale to the purchaser, irrespective of whether or not the information is specifically requested and regardless of the effect on the value of the diamond.
- No misuse of terminology or misrepresentations or attempts to disguise the product will be made in the selling, advertising and distribution of treated diamonds, synthetics and simulant.
- The word 'diamond' will not be used in the case of names of firms, manufacturers or trademarks; in connection with treated diamonds or diamond simulant or synthetic Diamonds.

c. Company has adopted the following definitions:
Diamond: A diamond is a natural mineral consisting essentially of pure carbon

crystallized with a cubic structure in the isometric system. Its hardness in the Mohs scale is 10; its specific gravity is approximately 3.52; it has a refractive index of 2.42 and it can be found in many colours.
Synthetic: A synthetic is any object or object that has been either partially or wholly crystallized or re-crystallized due to artificial human intervention such that, with the exception of being non-natural, the product meets the requirements specified in the definition of the word 'diamond' above.

Treated Diamond: A treated diamond is any object or product that meets the requirements specified in the definition of the words 'diamond' and 'synthetic' above, but has been subject to some form of treatment i.e. any process, enhancement changing, interfering with and/or contaminating the natural appearance or composition of a diamond other than historically accepted practices of cutting and polishing. This includes colour and decolourisation treatment, fracture filling, laser and irradiation treatment and coating.

Simulants: A diamond simulant is any object or product used to imitate some or all of the properties associated with a diamond and includes any material, which does not meet the requirements specified in the definition of the word 'diamond' above.

Lab Grown Material : Any reference to lab-grown materials within this standard shall be understood as meaning lab-grown diamonds and lab-grown coloured gemstones (emeralds, rubies and sapphires), used within the jewellery and watch supply chain, and within an RJC member's certification scope. This includes any lab-grown materials that are: • whole or partial, composite (assembled), constructed, restructured; • coatings (on natural or lab-grown stones); and • rough, polished and recycled.

Policy Statement Product Security

a. Company are committed to establish and implement product security measures within the premises and during shipments to protect against product theft, damage or substitution.

b. The security and well being of employees, visitors and other relevant business partners is prioritized when establishing product security measures.

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Disclosure of Treated Diamonds, Synthetics and Stimulants
Policy Statement

The policies relating to this section are part of the Business Principles adopted by Company. and are presented below for reference:

The following essential principles will be applicable in all the entity's transactions involving treated diamonds, synthetics and stimulants.

- Full disclosure i.e. the complete and total release of all available information about a diamond and all material steps it has undergone prior to sale to the purchaser, irrespective of whether the information is specifically requested and regardless of the effect on the value of the diamond.
- Full disclosure to the purchaser will take place when offered for sale, such that
  - Full verbal disclosure will clearly take place during sale.
  - Full written disclosure will be conspicuously included on each bill of sale or receipt in plain language and readily understandable to the purchaser. Written discloser will normally be in English language
- No misuse of terminology or mis-representations or attempts to disguise the product will be made in the selling, advertising and distribution of treated diamonds, synthetics and stimulants.
- The word 'diamond' will not be used in the case of names of firms, manufactures or trademarks; in connection with treated diamonds or diamond stimulants or synthetic diamonds."

" **Company**" has adopted the following definitions:

Diamond: A diamond is a natural mineral consisting essentially of pure carbon crystallized with a cubic structure in the isometric system. Its hardness in the Mohs scale is 10; its specific gravity is approximately 3.52; it has a refractive index of 2.42 and it can be found in many colours.

Synthetic: A synthetic is any object that has been either partially or wholly crystallized or re-crystallized due to artificial human intervention such that, with the exception of being non-natural, the product meets the requirements specified in the definition of the word 'diamond' above.

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Treated Diamond: A treated diamond is any object or product that meets the requirements specified in the definition of the words 'diamond and synthetic' above, but has been subject to some from of treatment i.e. any process, enhancement changing, interfering with and/or contaminating the natural appearance or composition of a diamond other than historically accepted practices of cutting and polishing. This includes color and decolourisation treatment, fracture filling, laser and irradiation treatment and coating.

Stimulants: A diamond stimulant is any object or product used to imitate some or all of the properties associated with a diamond and includes any material, which does not meet the requirements specified in the definition of the word 'diamond' above.

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Diversity, Equity and Inclusion Policy

Ruma HK Limited is committed to fostering, cultivating and preserving a culture of diversity, equity and inclusion.

Whole structure of the company comprised of management with different experience, skills and capabilities. Our human capital is the most valuable asset we have. The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities and talent that our employees invest in their work represents a significant part of not only our culture, but our reputation and company's achievement as well.

We embrace and encourage our employees' differences in age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socio-economic status, veteran status, and other characteristics that make our employees unique.

Ruma HK Limited. diversity initiatives are applicable—but not limited—to our practices and policies on cross cultural activities and development, skill enhancing programmes, recruitment and selection; compensation and benefits; professional development and training; promotions; transfers; social and recreational programs; layoffs; terminations; and the ongoing development of a work environment built on the premise of gender and diversity equity that encourages and enforces:

- The company has hired external experts who can support employees in enhancing required knowledge to perform task
- Addressing financial need over and above remuneration (including medical expense, educational loans and accommodation supports)
- All employees will be supported in the development of their skills to help maximize their potential.
- Bullying, harassment, and all forms of discrimination (direct or indirect) will be prohibited. Every report of discrimination and harassment will be taken seriously and acted upon.
- Togetherness and Respectful communication and cooperation between all employees.
- Teamwork and employee participation, permitting the representation of all groups and employee perspectives.
- Work/life balance through flexible work schedules to accommodate employees' varying needs.

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- Employer and employee contributions to the communities we serve to promote a greater understanding and respect for the diversity.
- We follow zero shouting work culture “No Yelling”

All employees of Ruma HK Limited. have a responsibility to treat others with dignity and respect at all times. All employees are expected to exhibit conduct that reflects inclusion during work, at work functions on or off the work site, and at all other company-sponsored and participative events. All employees are also required to attend and complete annual diversity awareness training to enhance their knowledge to fulfil this responsibility.

Any employee found to have exhibited any inappropriate conduct or behaviour against others may be subject to disciplinary action.

Employees who believe they have been subjected to any kind of discrimination that conflicts with the company’s diversity policy and initiatives should seek assistance from a supervisor or an HR representative.

Management responsibility

Management responsibilities for the policy may include:

- Regularly review the benefits, terms, and conditions of employment to ensure they are equal and not discriminatory
- Ensure no employees is discriminated against or harassed because of the discrimination
- Provide training to all employees on their role in preventing discrimination in the workplace

Policy on person with disabilities

The policy applies to persons with disabilities entering or already working in the Organization, including those who may acquire a disability in the course of employment.

“Persons with disabilities” include those who have long-term physical, mental, intellectual or sensory impairments, which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others.

The company recognizes that persons with disabilities include those whose have a permanent disability and is readily apparent and those whose disabilities are less apparent. Whether or not a permanent disability is readily apparent, any chronic medical condition that may have a repercussion on a person’s capacity to work or

lead a normal life may require adaptation of the working environment through reasonable accommodation.

The company is committed to providing equality of access to employment, advancement and retention in the Organization, recognizing that it is in the Organization's interest to recruit and maintain a diverse and skilled workforce that is representative of the diverse nature of society, which includes persons with disabilities.

The company will make every effort to be an employer of choice when the best candidate for the job has a disability, and will tap into sources of top-notch talent. The company will hire the best person for the job, regardless of disability the company notes that positive measures designed to meet the particular requirements of persons with disabilities are not regarded as discrimination against other staff members.

The Organization undertakes to promote a workplace culture based on fair practices which will safeguard the rights of persons with disabilities to be treated with dignity and respect and to enjoy equal terms and conditions of employment. However, treating people equally does not necessarily mean treating them the same. People with disabilities may have specific requirements which must be met in order for them to be included in the workforce. Every member of the company workforce is expected to contribute to creating and sustaining such a workplace.

During the application process, candidates who make their disabilities known will be requested to detail any accommodation they may require to enable them to compete for the position on an equal basis with other candidates. All reasonable efforts will be made by the Organization to comply with such requests.

The rights of persons with disabilities will be protected on an equal basis with others, including the right to just and favourable conditions of service, and to equal opportunities and equal remuneration for work of equal value. This also encompasses safe and healthy working conditions, including protection from harassment and the redress of grievances.

Persons with disabilities will not be discriminated against at any point in the employment cycle. This concerns all matters related to recruitment, selection, appointment, career guidance and development, learning opportunities, performance evaluations, promotions, transfers, retention in employment and return to work.

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Place: Hong Kong

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Policy Statement Bribery and Facilitation Payments

The policies relating to this section are part of the Business Policies adopted by Company and are presented below for reference:

a Company are committed to prohibit bribery in all business practices and transactions that are carried out by the company or on its behalf by business partners. The company will not offer, accept or countenance any payments, gifts in kind, hospitality, expenses or promises as such that may compromise the principles of fair competition or constitute an attempt to obtain or retain business for or with, or direct business to, any person; to influence the course of the business or governmental decision – making process.

b. Company consider Bribery Risk as it applies to its organization (including agents) to identify which areas pose high risks. Company has developed appropriate methods to monitor conduct of employees and agents and eliminate bribery based on this understanding.

c. The management of Company facilitates the reporting of incidences of attempted bribery or inappropriate gifts within their organization and shall apply appropriate sanctions for bribery and attempted bribery in all forms.

d. Company ensure that no employee will suffer demotion, penalty or other adverse consequences for voicing a concern, or for refusing to pay a bribe or facilitation payment even if this action may result in the enterprise losing business.

The Independent Commission Against Corruption (ICAC) enforces these laws, prosecuting both bribery by public servants and private citizens. The ordinance prohibits offering, soliciting, or accepting advantages to influence public bodies or private sector matters and includes provisions for confiscating ill-gotten gains.

Key Provisions and Offences

- **Public Sector Bribery:**

The POBO specifically prohibits offering, soliciting, or accepting an advantage to influence public officials in relation to contracts with public bodies, procurement processes, and other official actions.

- **Section 10 Offence:**

Date: 11/05/2026
Place: Hong Kong

This section criminalizes a public servant's maintaining a standard of living or controlling disproportionate assets without a satisfactory explanation.

- **Private Sector Bribery:**

  The POBO also covers bribery in the private sector, with broader provisions to prevent corruption in business dealings.

- **"Sweetening Doctrine":**

  Hong Kong's bribery laws allow for the prosecution of actions that build goodwill or offer future benefits, even without a direct quid pro quo, a concept known as the "sweetening doctrine".

  Penalties and Consequences

- **Deterrent Sentences:**

  Hong Kong courts emphasize deterrent sentencing, often resulting in immediate custodial sentences for bribery convictions.

- **Fines and Imprisonment:**

  Penalties vary by the severity of the offense, with some sections carrying maximums of 10 years imprisonment and significant fines.

- **Disqualification from Office:**

  Convicted individuals can be disqualified from holding elected or appointed positions in the Legislative Council, Executive Council, and other public bodies for up to five years.

- **Employment Bans:**

  Courts may prohibit convicted individuals from taking on or continuing in any employment, professional practice, or management role for up to seven years.

- **Confiscation of Assets:**

  The POBO includes provisions for the restitution of unlawfully obtained property and a special regime for the confiscation of assets.

  Enforcement and Support

- **Independent Commission Against Corruption (ICAC):**

This body is responsible for investigating and prosecuting corruption cases in Hong Kong.

Policy Statement Community Engagement and Development

- The policies relating to this section are part of the Business Policies adopted by Company and are presented below for reference:
- Company are committed to the development of communities where they operate, contributing to their social and economic welfare.

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Policy Statement Environmental protection, Use of Energy and natural resources

The policies relating to this section are part of the Business Policies adopted by Company and are presented below for reference:

Company are committed to effective environmental performance and will focus on the following initiatives:

- Conduct business in an environmentally responsible manner.
- Compliance with all applicable environmental laws and regulations
- The impact of our operations on the environment will be assessed and reviewed periodically to mitigate or eliminate such impact.
- Disposal procedures for waste generated will be clearly defined and practiced in line with standards that are set by law.
- Improvement of employee environmental awareness and performance through training.
- Efficient use of energy and natural resources to minimize waste generation through efforts that include recycling and prevention of pollution.
- Commitment to a continual improvement process in environmental management

Date: 11/05/2026
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Policy Statement Health and Safety

The policies relating to this section are part of the Business Policies adopted by Company and are presented below for reference:

Company recognizes the need to develop a sustainable, value creating business and is committed to the following in the areas of workplace health and safety:

- Providing safe and healthy working conditions for all employees in accordance with applicable law and other relevant industry standards.
- Any adverse impact of our business processes on those who carry it out shall be identified and eliminated. Towards this end, we will systematically review our operations to identify sources of health and safety related risks.
- We will provide adequate and appropriate labeling and storage of all chemicals and cleaning materials and adopt methods to protect employees from exposure to airborne particles and chemical fumes
- Our review of our processes will use appropriate standards as required by prevailing laws, expert opinion, feedback from workers and our knowledge of best practices. The review will lead to formulation of clearly described work practices and safety drills and appropriate safeguards and isolation from mobile equipment. All our staff will be trained in the manner required to adhere to these work practices and drills.
- Workers shall not be under the influence of or abusing, drugs, alcohol and/ or other illegal substances.
- We will seek to substitute the use of material, which are known to cause an adverse impact on the health of workers or health of consumers in the course of its use.
- All workplaces will be constructed to meet safety standards with local regulations as the minimum standards that will be applicable.
- We will take adequate measures to safeguard our employees from fire and other workplace injuries.
- All products sold by Company to consumers shall comply to applicable regulations of product health and safety.

  Key Legislation

- **Occupational Safety and Health Ordinance (Cap. 509) (OSHO):**

  This ordinance applies to all economic activities and places general duties on employers, occupiers of premises, and employees to ensure health and safety at work.
- **Factories and Industrial Undertakings Ordinance (Cap. 59) (FIUO):**

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Place: Hong Kong

This ordinance specifically regulates safety and health in industrial undertakings, including factories and construction sites.

- **Subsidiary Regulations:**

  There are also subsidiary regulations under these ordinances that provide more specific requirements and could involve purchasing safety equipment or hiring safety consultants.

  Duties of Employers

- **Safe Systems and Plant:**
  Provide and maintain plant, work systems, and access/egress points that are safe and free from health risks.
- **Information, Instruction, and Training:**
  Supply necessary information, instructions, and training to ensure the safety and health of employees.
- **Safe Workplace Environment:**
  Maintain the workplace, including any plant or substances within it, in a condition that is safe and without risks to health.
- **Safety Management Systems:**

  For certain industrial undertakings, develop and implement a company safety management system with key elements for self-regulation.

  Other Stakeholder Responsibilities

- **Occupiers of Premises:** Are responsible for ensuring that their premises, access/egress, and any plant or substances kept there are safe for everyone on the premises.
- **Employees:** Also have a role to play in maintaining a safe and healthy workplace.

  Specific Areas Covered

- **Workplace Environment:** Includes general working environments, hygiene, and fire precautions.
- **Accident Prevention:** Measures for the prevention of accidents are a core requirement.
- **Manual Handling and Display Screen Equipment:** Regulations address the safe use of manual handling operations and display screen equipment.
- **First Aid:** Requirements for providing first aid facilities and personnel.

  Enforcement and Support

- **Labour Department:**

Provides regulatory oversight through its various units, including those focused on occupational safety and health.

- **Occupational Safety and Health Council (OSHC):**

  A statutory body that works to promote safety and health at work through various initiatives and information sharing, including legislation overviews.

Policy Statement of Human Rights

The policies relating to this section are part of the Business Policies adopted by Company and are presented below for reference:

a) All employees in Company will be treated with equality, respect and dignity.
b) Company believes in and respects fundamental human rights according to the United Nations Universal Declaration of Human Rights.
c) Company will not interfere in the right of employees to observe tenets or practices based on caste, race, national origin, gender, religion, disability, union membership, or political affiliation
d) Company strongly discourages any form of sexually coercive, threatening, abusive or exploitative behavior.
e) 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.
f) Security personnel, if employed by Company are trained to respect the human rights and dignity of all people and use of minimum force proportionate to the perceived threat.
g) Wherever the any violation of human rights are observed, the company shall take mitigation action and if needed hire an external non-governmental organization for the implementation.
h) Human rights risk assessment shall be done annually covering internal and external stakeholders.
i) The company shall conduct human right risk assessment and upon any violation observed internal or external stake holders, company shall develop and implement risk mitigation plan according to severity of incident. The company may seek assistance from external NGO's or experts to develop and

implement mitigation plan and monitoring.

j) The company shall provide support and consultation to external stakeholders upon written request by the business partners.

Policy Statement Use of Security Personnel

The policies relating to this section are part of the Business Policies adopted by Company and are presented below for reference:

Security personnel, if employed by Company, are trained to respect the human rights and dignity of all people and use of minimum force proportionate to the perceived threat.

Policy of Lab Grown Material

The requirements for establishing responsible business practices throughout the jewellery and watch supply chain, for handling laboratory grown materials

The LGMS is comprised broad objectives:

- To improve legal and regulatory compliance, strengthen public reporting and secure a commitment to responsible business practices.
- To increase the use of due diligence in supply chains to uphold human rights, support community development, promote anti-corruption efforts and manage sourcing risks.
- To adequately control and disclose information about products and so avoid misleading or deceptive marketing practices.
- To protect the health and safety of both people and environments and to use natural resources efficiently.
- To better comply with international labour conventions and ensure responsible working conditions.
- Any reference to lab-grown materials within this standard shall be understood as meaning lab-grown diamonds and lab-grown coloured gemstones (emeralds, rubies and sapphires), used within the jewellery and watch supply chain, and within an RJC member's certification scope. This includes any lab-grown materials that are: • whole or partial, composite (assembled), constructed, restructured; • coatings (on natural or lab-grown stones); and • rough, polished and recycled
- Members shall disclose information on the physical characteristics of the products listed in LGMS 27.1 in compliance with applicable law. Unless a conflict with applicable law exists, members shall apply the following requirements to support disclosure about physical characteristics: a. Laboratory grown materials: Wholly or partially laboratory-grown materials shall be disclosed as 'laboratory grown', 'laboratory created', '[manufacturer name] – created', and/or 'synthetic'. Abbreviations such as 'lab-grown' or 'lab-

created' are also acceptable. The description shall be equally as conspicuous as the word 'diamond' or the name of the coloured gemstone. i. In the case of coating, the material being coated must be disclosed as 'coated [name of material]'

Composites: Composite (or assembled) lab-grown materials constructed of two or more parts shall be disclosed as 'composite', 'assembled', 'doublet' or 'triplet', and by the correct name of the material of which it is composed. The use of the term 'diamond/ gemstone' or 'laboratory/created/synthetic diamond/gemstone' in relation to such stones is unacceptable. The description shall be equally as conspicuous as the name of the material used. Members shall not use terms and definitions that are misleading in relation to composite (assembled) stones and/or conceal information about their parts. c. Reconstructed stones: Reconstructed stones using lab-grown materials shall be disclosed as such and the description shall be equally conspicuous as the name of the material. d. Simulants (or imitation): Any product used to imitate the appearance of lab-grown materials without having their chemical composition, physical properties and/or their structure shall be disclosed as 'imitation' or 'simulant' along with the correct name of the material of which it is composed, for example, 'x compound', 'glass', 'plastic'. The description shall be equally as conspicuous as name of the lab-grown material. Simulants must not be referred to as laboratory grown or laboratory created. e. Descriptions of polished lab-grown materials: Describe the dimension or carat weight, colour, clarity and cut of lab-grown diamonds and coloured gemstones in accordance with the recognised guidelines appropriate to the particular jurisdiction. f. Enhancements: Any part of the growth/manufacturing process or subsequent enhancements to the created material that are deemed to be unstable and/or non permanent in nature shall be disclosed. g. Product health and safety information: Any relevant health and safety information about the materials listed in LGMS 27.1 in jewellery products sold by members to end consumers shall be disclosed. This includes irradiated lab-grown materials.

Date: 11/05/2026
Place: Hong Kong

Policy Document	Policies	Rev. No. 05
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Ethical Sourcing/Due Diligence and Risk Assessment Policy

The Policy promotes the standards that we expect all our suppliers to comply with when producing and supplying Diamonds, no matter where they operate in the world. We hereby inform all our suppliers to provide the first mine of origin for the material they supply to us. We request all our suppliers not to supply any material that is subject to restriction as per EU Reg. 833/2014

The senior management of Company advocate this policy, and we shall review as and when changes in the process or compliance requirement or any violation of sourcing policy or Changes in risk and due diligence criteria. We shall carry out review of this entire document at least annually.

We recognize that full compliance with these criteria may take time for some suppliers, and we are committed to working with our suppliers to implement improvement plans and help them achieve compliance.

Member Company are committed to working in partnership with its suppliers to help achieve compliance with this Policy.

All the supplier should comply with national and international law and trade requirement like RJC with respect to Bribery and Corruption, Financial Offence, Labour Rights, Kimberley process and World Diamond Council – SoW, Product disclosure, Labour Rights, Working Condition, Child labour, Forced labour, Human rights, Discrimination, Fair wages and working hours, Environment compliance, Health and safety of the employees and visitor.

Policy – Supply Chain and Ethical Sourcing

At Company, we take Ethical business practice, social and environmental factors into consideration in making decisions on the procurement of polish diamonds.

This Policy shows company’s commitment and its expectations for its product suppliers regarding actions to address Conflict Diamonds.

Company expects it's suppliers to have in place policies and due diligence measures that will enable us to reasonably assure that diamonds supplied to us containing conflict free diamonds are not belongs to Conflict-affected and high-risk areas – CAHRAs .

We being a responsible company, Company supports the goal of the Dodd-Frank Act of preventing armed groups in the conflict affected and high risk countries from benefitting from the sourcing of Conflict diamonds from that region.

Date: 11/05/2026
Place: Hong Kong

Company 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 diamonds mined or manufacture and sell to Company. Company reserves the right to evaluate the extent to which a supplier has failed to reasonably comply with this Policy.

Company reserves the right to request additional documentation from its suppliers regarding the origin/source of diamonds sold to Company.

Suppliers who do not reasonably comply with this Policy shall be reviewed by Company ’s for future business.

We shall communicate to our supplier to derive firs mine of origin and we request all our supplier through this policy to share with us for first mine of origin for diamond and other relevant materials.

Company are committed to ensuring that our supply chain is free of any diamonds 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.

Company 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/traders.

We shall always set reasonable efforts to source Diamonds from miners and traders validated as being Conflict Free and require their direct and indirect suppliers to do the same;

Date: 11/05/2026
Place: Hong Kong

We strive to work supportively with our customers and supply chain partners in implementing conflict free compliance programs for Diamond Supply chain.

Policy – Due Diligence and Risk Assessment

The company shall always undertake to ensure that the extraction and trade of diamond support peace and development, not conflict.

Company remain 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.

All the suppliers are also requested to carry our risk assessment and due diligence for their suppliers and products they are sourcing.

Currently Company procure it's diamonds from RJC CoP/Ethical business practice compliant miners/traders. However, we have 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.

Identify red-flags and Risk

The company has checked transaction methods and name and individuals of company on SDN list of USA treasury and EU sanction list. All the suppliers are found low in risk and in compliance with OECD requirement of CAHRA's.

Risk mitigation plan

- ✓ Company shall always deal with legitimate company.
- ✓ Always complete due diligence and risk assessment before establishing commercial relationships.
- ✓ Make sure that do transaction shall be carried out with business sense.
- ✓ Immediately stop commercial relationship upon any violation observed an report to concerned internal and external reporting authority.
- ✓ Continuously monitor suspicious transactions and red flag records
- ✓ Communication and awareness to suppliers

Date: 11/05/2026
Place: Hong Kong

Ethical Business Policy Compliance (RJC Code of Practice)/Supplier Risk Assessment /Due Diligence Report -2024

We the senior management of Company and compliance officer has verified all our supplier with respect to following ;

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

US OFAC Sanctions/EU Sanctions/Global Peace Index/Know Your Country

Transparency International (TI)/ The Office of the United Nations High Commissioner for Human Rights (OHCHR)

http://www.responsiblemineralsinitiative.org/minerals-due-diligence/risk-management/conflict-affected-and-high-risk-areas/

Publication (Detailed report is with Compliance team and may produce to concerned parties upon request)

RJC CoP Annual Compliance - 2025: The company has carried our ethical business practice and carried out policy and procedure review with respect to it's implementation. The company has complied with latest RJC Code of Practice and all its requirement. **Ethical Standard/Commitment**-- No practice or conduct observed during the assessment period that brings the diamond industry into disrepute. All businesses practices have adhered to national laws and applicable rules and regulation during the assessment period.

We have conducted risk assessment and due diligence of all our suppliers and customers with respect to latest OECD requirements and RJC guideline and we found all our supplier are complying with requirements did not find any risk pertaining to their business involvement in Conflict Affected and high-risk Areas' (CAHR's). Human rights due diligence and risk assessment has been conducted for internal and external stake holders and found compliant with low risk possibilities.

Date: 11/05/2026
Place: Hong Kong

Supplier Risk Assessment /Due Diligence Report – Publication (Detailed report is with Compliance team and may produce to concerned parties upon request)

Due Diligence Steps		Supplier RJC/BPP	Supplier Traders	Customers
Step 1: Establish strong company management systems				
	Supply chain policy	Yes	Yes	Yes
	Management structure and responsibilities for due diligence programme	Yes	Yes	Yes
	Record-keeping systems	Yes	Yes	Yes
Step 2: Identify and assess risk in the supply chain				
	Assessment of supplier's due diligence practices	Yes	Yes	Yes
	Methodology of company supply chain risk assessments	RJC CoP	RJC CoP Compliant/ Declaration for ethical business practices	
	Actual/potential risks identified	Low	Low	Low
Step 3: Design/implement a strategy to respond to identified risks (if applicable)				
	Steps taken to manage risks, including involvement of affected stakeholders	NIL	NIL	NIL
	Efforts made to monitor/track performance for risk mitigation	On Going	On Going	On Going
	All instances of risk mitigation and results of follow-up after six months	NIL	NIL	NIL
Step 4: Independent Third-Party Audits				
	Company should be audited by qualified	Yes	Yes	Yes
Step 5: Report Annually on Supply Chain Due Diligence				
	Published report or communicated	Yes	Yes	Yes

Date: 11/05/2026
Place: Hong Kong

Human right – CAHRA's Breaches report

Sr#	Description	Comments
1	Is company dealing with any illegitimate customers/suppliers?	No
2	Any violation of CAHRA's during last one year?	No
3	Dealing with any illegitimate business partners?	No
4	Any incident of Human right violation or financial offence observed?	No
5	Suppliers are complying with OECD requirements?	Yes
6	Any material sourced from Violated area?	No
7	Any unethical business practice observed in any business partners activity?	No
8	Over all Suppliers Risk assessed in assessment period?	Low

Date: 08/05/2026

Place: Hong Kong