

GEMS QUALITY GROUP
SUPPLY CHAIN POLICY

Applicable to: Gems Quality Co., Ltd. (GQ TH)
GEMSTONE SUPPLY CHAIN POLICY

Date of effect: July 2021
Date last reviewed: 30 June 2026

Revision History

This table records the history of changes made to this Supply Chain Policy.

Version	Date	Description of Change	Prepared / Revised By
1.0	2021-07	Original Gemstone Supply Chain Policy issued for Gems Quality Co., Ltd. (GQ TH), aligned with RJC membership commitments and OECD Annex II model policy language.	Victor Galvao
2.0	2026-06-30	Reviewed for continued alignment with RJC COP 2024 and OECD Annex II; added explicit Scope section clarifying applicability to GQ TH only and cross-referencing the Group Policy's Business Partner Policy (Section 4); reformatted to match Group Policy header, footer, and styling.	Nini (draft)
	2026-07-01	Approved by Director	Victor Galvao

Scope

This Policy applies to Gems Quality Co., Ltd. (“GQ TH”), the Group entity responsible for sourcing and purchasing rough coloured gemstones from external suppliers. Gems Quality Lanka (Pvt.) Ltd. (“GQ LK”) does not independently source or purchase gemstones; GQ LK’s sole business partner is GQ TH, and the relationship between the two entities is addressed under the Group Company Policy’s Business Partner Policy (Section 4).

Policy Statement

Gems Quality Co, Ltd. is a supplier and manufacturer of colored Gemstones. This policy confirms that Gems Quality commitment to respect human rights, avoid contributing to the finance of conflict and comply with all relevant UN sanctions, resolutions and laws.

Gems Quality is a member of the Responsible Jewellery Council (RJC). As such, we commit to proving, through independent third-party verification, that we:

- Respect human rights according to the Universal Declaration of Human Rights and International Labour Organization Declaration on Fundamental Principles and Rights at Work;
- Do not engage in or tolerate bribery, corruption, money laundering or finance of terrorism;
- Support transparency of government payments and rights-compatible security forces in the extractives industry;
- Do not provide direct or indirect support to illegal armed groups;
- Enable stakeholders to voice concerns about the jewellery supply chain; and
- Are implementing 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.

Commitment to Use of Influence to Prevent Abuses by Others

We also commit to using our influence to prevent abuses by others.

Regarding serious abuses associated with the extraction, transport or trade of minerals: We will neither tolerate nor profit from, contribute to, assist or facilitate the commission of:

- Torture, cruel, inhuman and degrading treatment;
- Forced or compulsory labour;
- The worst forms of child labour;
- Human rights violations and abuses; or
- War crimes, violations of international humanitarian law, crimes against humanity or genocide.

We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are committing the abuses described above or are sourcing from, or linked to, any party committing these abuses.

Non-State Armed Groups

We will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring gemstones from, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates who illegally:

- Control mine sites, transportation routes, points where gemstones are traded and upstream actors in the supply chain; or
- Tax or extort money or gems at mine sites, along transportation routes or at points where gemstones are traded, or from intermediaries, export companies or international traders.

We 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 above.

Public or Private Security Forces

We 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 the abuses described above or that act illegally as described above.

Bribery and Fraudulent Misrepresentation of Origin

We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of minerals, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of minerals.

Money Laundering

We will support and contribute to efforts to eliminate money laundering where we identify a reasonable risk resulting from, or connected to, the extraction, trade, handling, transport or export of minerals.

Review and Sign-Off

Date last reviewed: July 2026 — reviewed for continued alignment with RJC COP 2024, Annex II of the OECD Due Diligence Guidance, and the current two-entity Group structure (GQ TH / GQ LK). No substantive changes identified; scope clarification added above.

Date of next review: July 2027, or sooner upon material change to sourcing countries, suppliers, or applicable law.

Signed/endorsed: Victor Galvao, Managing Director

Date: 1 July 2026