



B.H.C. DIAMONDS (THAI) CO., LTD.
บริษัท บี.เอช.ซี. ไดมอนด์ส (ไทย) จำกัด

322/40 BANGKOK GEM & JEWELRY TOWER,
18th FLOOR, SURAWONGSE ROAD,
SIPRAYA, BANGRAK, BANGKOK 10500,
THAILAND.

Supply Chain Policy

1. B.H.C. Diamonds (Thai) Co., Ltd. is diamond trading company emphasizes on creating value and success with our customer through the trading of Diamonds. This policy confirms B.H.C. Diamonds (Thai) Co., Ltd.'s commitment to respect human rights, avoid contributing to the finance of conflict and comply with all relevant UN sanctions, resolutions and laws.
2. B.H.C. Diamonds (Thai) Co., Ltd. is a member of the Responsible Jewellery Council (RJC). As such, we commit to proving, through independent third-party verification, that we:
 - a. respect human rights according to the Universal Declaration of Human Rights and International Labour Organization Fundamental Rights at Work;
 - b. do not engage in or tolerate bribery, corruption, money laundering or finance of terrorism;
 - c. support transparency of government payments and rights-compatible security forces in the extractives industry;
 - d. do not provide direct or indirect support to illegal armed groups; and
 - e. enable stakeholders to voice concerns about the jewellery supply chain.
 - f. are implementing the OECD 5-Step framework as a management process for risk based due diligence for responsible supply chains of minerals from conflict-affected and high-risk areas.
3. We also commit to using our influence to prevent abuses by others. We address any risks in our supply chain composed of bribery, human rights, anti-corruption, fraud, money laundering, health & safety, environmental to our supplier and customer due diligence. The due diligence and risk assessment of supplier and customer is conducted annual basis, or any circumstantial risks which changed during the year. We will send out our Know-Your-Counterparty questionnaire to obtain information with related document for assessing any risks and include during our business transactions.
We also set out the due diligence criteria to avoid our diamonds are sourced from conflict free and aligned with Kimberley Process Certification Scheme.
As we established the grievance policy to hear any concerns from any stakeholders and interested parties. If you have any concerns to our supply chain or our suppliers sourced from Conflict-Affected and High-Risk Areas (CAHRAs).
4. **Regarding serious abuses associated with the extraction, transport or trade of diamonds/coloured gemstones**
We will neither tolerate nor profit from, contribute to, assist or facilitate the commission of:
 - a. torture, cruel, inhuman and degrading treatment;
 - b. forced or compulsory labour;
 - c. the worst forms of child labour;
 - d. human rights violations and abuses; or
 - e. war crimes, violations of international humanitarian law, crimes against humanity or genocide.



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

6. Regarding direct or indirect support to non-state armed groups

We only sell or purchase diamonds that are fully compliant with the Kimberley Process Certification Scheme and, as such, will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring diamonds from, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates who illegally:

- a. control mine sites, transportation routes, points where diamonds/coloured gemstones are traded and upstream actors in the supply chain; or
- b. tax or extort money or diamonds at mine sites, along transportation routes or at points where diamonds are traded, or from intermediaries, export companies or international traders.

7. 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 in paragraph 6.

8. Regarding 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 abuses described in paragraph 4 or that act illegally as described in paragraph 6.

9. Regarding bribery and fraudulent misrepresentation of the origin of Diamonds/Coloured gemstones

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

10. Regarding 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 diamonds.

This policy is issued and announced on 1 January 2024.



Mr. Bhavesh Gandhi
Managing Director