

— BUSINESS PRINCIPLES

Ethical Business *Policy*.

S & J Diamond Corp has worked in New York's Diamond District since 1995. We began in loose diamonds — trading stones and servicing the trade — and source our own diamonds, natural and lab, along with our colorstone, rather than buying finished goods. This policy sets out the ethical principles that govern how we operate, source, and conduct business across our supply chain. It is published for our employees, suppliers, customers, and the public, and is reviewed periodically.

Legislation and Regulations

- S & J Diamond Corp shall operate in compliance with relevant national and international legislation and regulations as applicable in the countries in which it operates.
- All employees are expected and directed to comply with all applicable laws and regulations, as well as with the rules and regulations formed by S & J Diamond Corp regarding its business policies.
- The compliance team maintains the list of applicable legal and regulatory requirements, and the same is followed for compliance on a day-to-day basis. Necessary records of requirements and their compliance are maintained.

Money Laundering, Terrorism Financing & Other Financial Offences

- S & J Diamond Corp recognizes the fact that entities in the gems and jewellery sector have to take on the onus of analysing their potential vulnerabilities to money laundering and implement the specific steps that are required for protection against abuse by criminals.
- Strict compliance is required at all times with all applicable national and, where appropriate, international laws and regulations with respect to money laundering, terrorism financing, bribery, facilitation payments, corruption, smuggling, embezzlement, fraud, racketeering, transfer pricing and tax evasion.
- S & J Diamond Corp shall act in accordance with national laws with respect to auditing of its financial accounts and maintaining internal controls as guided by various regulations.
- It is the responsibility of concerned personnel to know and understand the relevant money laundering and financial-offence-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 a violation of the Business Principles, depending on the seriousness of the non-conformance.
- The compliance officer ensures all critical steps — such as KYC (Know Your Counterparty), identification of suspicious transactions, reporting to management and record keeping as required by local acts and legislation — are complied with.
- The compliance officer carries out periodic review of AML/CFT compliances and submits a report to management on a quarterly basis.

Acts and guidelines considered

- Prevention of Money Laundering Act, 2002
- FATF 40 Recommendations and 8 Special Recommendations

Kimberley Process & System of Warranties

- S & J Diamond Corp is fully committed to complying with all the requirements specified in the Kimberley Process Certification Scheme and the World Diamond Council's (WDC) System of Warranties Declaration.
- We will not engage in business with any supply chain that deals in 'conflict diamonds' or that does not follow the System of Warranties Declaration in invoices. Doing so, either knowingly or unknowingly, will be considered a violation of the Business Principles.

Anti-Bribery & Facilitation Payment Policy

- S & J Diamond Corp shall ensure complete prohibition of bribery and facilitation payments across the organization and in all its entities.
- S & J Diamond Corp will not offer, accept or countenance any payment, gift in kind, hospitality, expense or promise that may compromise fair competition.
- The entity shall prohibit bribery and facilitation payments and shall comply with the various rules and regulations of the land.

Disclosure of Treated Diamonds, Synthetics & Simulants

The following essential principles apply to all transactions involving treated diamonds, synthetics and simulants:

- 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.
- We deal in real and natural diamonds only, and any treatment of real and natural diamonds is disclosed to the customer prior to sale.

Responsible Sourcing — Conflict Minerals Policy (Diamond & Gemstone)

S & J Diamond Corp is committed to being a responsible corporate citizen and is opposed to human rights abuses. As part of that commitment, S & J Diamond Corp seeks to source products, components and materials from companies that share our values around human rights, ethics and environmental responsibility.

S & J Diamond Corp shall strive to ensure that all its supplies of diamonds do not originate from Conflict-Affected and High-Risk Areas (CAHRAs) and, where practically possible, the origin of diamonds is known to us.

What are “conflict diamonds”?

Blood diamonds, also known as “conflict diamonds,” are stones produced in areas controlled by rebel forces that are opposed to internationally recognized governments. The rebels sell these diamonds, and the money is used to purchase arms or to fund their military actions.

Blood diamonds are often produced through the forced labour of men, women and children. They are also stolen during shipment or seized by attacking the mining operations of legitimate producers. The stones are then smuggled into the international diamond trade and sold as legitimate gems. Enormous amounts of money are at stake, and bribes, threats, torture and murder are modes of operation — which is why the term “blood diamonds” is used.

What are CAHRAs?

CAHRAs — Conflict-Affected and High-Risk Areas — are areas identified by the presence of armed conflict, widespread violence or other risks of serious and widespread harm to people. Such areas are often characterised by weak or absent governance and security, and by human-rights abuses.

S & J Diamond Corp ensures that none of its supplies come from such areas. S & J Diamond Corp shall communicate its sourcing policy to all its stakeholders and will ensure effective implementation of its policy amongst all its entities. For the current list of CAHRAs under EU Regulation 2017/821, refer to cahraslist.net/cahras.

Supply Chain Management / Best Endeavours

- The management of S & J Diamond Corp is committed to using best endeavours to ensure that suppliers and contractors are committed to compliance with international social standards.
- Annual communications are exchanged with all the supply chain to spread awareness.

Employment

- Compliance is required at all times with applicable national and, where appropriate, international laws and regulations with respect to employment and labour.
- S & J Diamond Corp shall not require staff to work more than the national limit of hours in a week on a regular basis.
- S & J Diamond Corp shall ensure that wages and benefits for a standard working week meet at least national minimum standards and are sufficient to meet the basic needs of staff and provide some discretionary income.

Health & Safety

S & J Diamond Corp 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. Toward this end, we systematically review our operations to identify sources of health- and safety-related risks.
- This review uses appropriate standards as required by prevailing laws, expert opinion and our knowledge of best practices.
- All workplaces will be constructed to meet safety standards, with local regulations as the minimum standards that will apply.

Non-Discrimination & Disciplinary Practices

- Discrimination can mean distinction, exclusion or preference. 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 affiliation, or any criteria that are unlawful, is strongly discouraged by S & J Diamond Corp, and any such reported incident will be viewed as a serious violation of these Business Principles.
- We 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.
- We shall at no time condone the use of corporal punishment or other forms of mental or physical coercion.
- We encourage all personnel to voice concerns promptly if they have a genuine reason to believe that a policy, operation or practice is, or is likely to be, in violation of any law, regulation or internal rule or policy, including these Business Principles. S & J Diamond Corp assures all employees who come forward in good faith to report issues that they will be treated fairly and respectfully.

Child Labour

- No form of child labour shall be employed at any of the facilities of S & J Diamond Corp. Unless local laws stipulate a higher age, the minimum age for employment that will apply is fifteen (as per ILO Convention No. 138).
- For authorized adolescents (persons below 18 years of age but above 15 years), management is responsible for providing working conditions, hours of work and wages in compliance with applicable local laws as a minimum.
- As per company policy, no child labour or adolescent child labour will be employed.
- S & J Diamond Corp will implement suitable policy and procedures to verify the age proof of all new employees joining the organization.

Forced Labour

The management of S & J Diamond Corp is fully committed to ensuring that forced or involuntary labour is not practiced in any form at any of its facilities. Any reported incident relating to forced labour will be considered a serious violation of these Business Principles. The following definitions apply:

- The Universal Declaration of Human Rights, which 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 exacted from any person under the menace of any penalty, and for which the said person has not offered himself voluntarily.”

Human Rights

- All employees in S & J Diamond Corp's facilities will be treated with equality, respect and dignity.
- S & J Diamond Corp 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.
- S & J Diamond Corp strongly discourages any form of sexually coercive, threatening, abusive or exploitative behaviour.
- Any reported incident relating to direct or indirect physical, sexual, racial, religious, psychological or verbal harassment or abuse, or any other form of intimidation or degrading treatment, will not be tolerated by S & J Diamond Corp.
- HSE and anti-sexual-harassment committees are formed, and the committee shall review compliance at regular intervals by holding review meetings.

Environmental Protection

S & J Diamond Corp 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 on the environment will be systematically assessed for compliance with appropriately defined standards and reviewed periodically to mitigate or eliminate such impact.
- Disposal procedures for waste generated will be clearly defined and practiced in line with standards set by law and by industry best practices.
- Improvement of employee environmental awareness and performance through detailed policies and procedures, training, and recognition of excellence.

Environmental management systems

The organization maintains environmental controls and procedures to manage resource use, emissions and waste in line with applicable legal and RJC COP 2024 requirements.

Legal compliance

As an organization, there are currently no specific environmental legal compliance requirements applicable to our operations, except for provisions under pollution-control regulations where applicable. As part of our commitment to good governance and sustainable practices, we maintain records of electricity consumption. These records are reviewed periodically to monitor energy usage and identify opportunities for efficient energy utilization and conservation.

Water stewardship

As a small trading office, there are currently no specific environmental legal compliance requirements applicable to our operations. However, as part of our commitment to responsible

business practices, we monitor and maintain records of our electricity consumption and seek to use resources efficiently wherever possible.

Climate & energy management — GHG measurement

Greenhouse gas (GHG) emissions from Scope 1 and Scope 2 are calculated and monitored periodically in line with recognized methodologies. The company carbon footprint as of 31 December 2025 has been calculated. Management is currently reviewing the baseline study, and a sustainability report is available on request.

Climate action & continuous improvement

Emission-reduction targets and energy-efficiency initiatives are identified based on GHG assessments to support continuous improvement over time.

Product Security

S & J Diamond Corp is committed to the safety of its product throughout the supply chain by following the precautions below:

- Each and every stage of product processing is covered through blanket insurance.
- Suitable safeguarding and storage is ensured at all stages with the help of safes.
- We take the utmost care to ensure the safety of visitors, customers and interested parties, with suitable arrangements such as CCTV, multi-level entry doors and other electronic intelligence.
- All concerned persons are trained on the relevant safety and security procedures to be followed at all times.

Whistleblower Protection — Scope & Coverage

This whistleblower protection mechanism is established to enable employees, contract workers, suppliers and other relevant stakeholders to safely raise concerns related to actual or suspected misconduct or non-compliance. The scope of reportable concerns includes, but is not limited to, breaches of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals, AML/CFT laws and regulations, the Kimberley Process Certification Scheme, Source of Wealth (SOW) and disclosure requirements, as well as social, labour and human-rights standards and health, safety and environmental (HSE) obligations. This mechanism supports ethical conduct, transparency and responsible business practices across the precious-metals, diamonds and jewellery supply chain, and is designed to align with applicable legal, regulatory and industry-specific expectations.

Any grievance or whistleblowing can be raised in multiple ways — a phone call to the compliance officer, email, a meeting in person, and other communication methods. Contact details of the compliance officer are published.

Supply Chain Grievances & Whistleblowing Policy

- S & J Diamond Corp grievance procedures have been established and are available for all employees to raise any issue or grievance concerning work culture, discipline, practices and supply chain concerns.
- If any grievance from a customer and/or supply chain partner is reported relating to any actual, alleged or suspected breach of this policy, the matter shall be raised in accordance with this Supply Chain Grievance Policy.
- The relevant worker responsible for the relationship with the supplier must communicate to the supplier the receipt of the complaint and issue a summary report on the conclusion of the investigation.
- The supplier's staff must be informed of our supply chain grievance policy, and it is made available to them so it can be used as a way of raising any concerns.
- With respect to breaches by any party of the Supply Chain Policy commitments and/or the Supplier Code of Conduct, the breach will be reported to senior management, and based on an investigation report, necessary actions shall be taken if needed.

Top management and the marketing team deal with grievances, concerns and complaints submitted by employees, clients, customers and other affected end-users and stakeholders.

Objectives of the grievance mechanism

- Ensure that materials acquired and services provided are obtained with adherence to human rights, labour, environmental and the highest business ethics.
- Ensure justice, employment satisfaction and the stability of the legal status of employees.
- Ensure that business activities meet international market ethics and standards.
- Ensure that business operates in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and its

Supplement on Gold, the DMCC Rules for Risk-Based Due Diligence in the Gold and Precious Metals Supply Chain, and the Responsible Jewellery Council.

- Maintain the highest standard in operating in the industry.

Grounds for a grievance

- Human rights violations — forced and child labour, torture, serious abuses, etc.
- Contravention of the law, regulations or by-laws.
- Accounts and financial manipulation.
- Fraud, bribery, corruption and solicitation.
- Falsification of documents.
- Tolerance of law and regulation violators, and support of non-state armed groups and all forms of criminal activity.
- Employee misconduct and labour practices.
- Health and safety; working conditions.

We encourage all to submit reports, along with solid supporting documents and as much information as possible for the investigation, to accounting@snjny.com.

Confidentiality

The committee will guarantee, to the utmost capability of S & J Diamond Corp, that the identity of the concerned person is kept confidential with respect to all events. Documents, files and all information that comes to their knowledge will be used solely for the purpose of investigating illegal activities or non-compliance allegations against S & J Diamond Corp policies.

Grievance escalation procedure & timeline

1 Submission of grievance

COMPLAINANT (EMPLOYEE, CLIENT, CUSTOMER, STAKEHOLDER OR END-USER)

Submission via email, with full details of the grievance, supporting documentation and evidence (if available), and name and contact information (optional for anonymous reporting). Full confidentiality guaranteed.

At any time

2 Acknowledgement of receipt

COMPLIANCE OFFICER

Issue written acknowledgment of grievance receipt.

Within 3 working days of submission

3 Preliminary review & risk assessment

GRIEVANCES & COMPLAINTS COMMITTEE

Assess completeness of the submission, evaluate urgency and severity, and determine whether the issue falls under committee jurisdiction.

Within 7 working days of acknowledgment

4 Initiation of investigation

ASSIGNED INVESTIGATORS (COMPLIANCE OR LEGAL)

Conduct internal investigation, request clarifications or additional documents, and interview relevant parties where applicable.

Initiated within 10 working days of the preliminary review; completed within 20 working days unless extended for complexity

5 Escalation (if necessary)

SENIOR MANAGEMENT · BOARD COMPLIANCE SUB-COMMITTEE · EXTERNAL AUDITOR

Where the issue cannot be resolved internally or requires higher authority or external reporting, it is escalated to senior management, the board compliance sub-committee, or an external auditor (if legally required or a high-risk breach).

Escalation decision within 5 working days of investigation conclusion

6 Final decision & corrective actions

GRIEVANCES & COMPLAINTS COMMITTEE

Issue a reasoned written decision, recommend corrective or disciplinary actions, notify the complainant (unless anonymous), and update internal risk-management systems.

Within 10 working days of the conclusion of the investigation

7 Follow-up & monitoring

COMPLIANCE OFFICER

Ensure implementation of corrective measures, monitor resolution progress, and re-assess for recurrence risk.

Periodic check-ins at 30, 60 and 90 days after the decision

8 Recordkeeping & reporting

COMPLIANCE DEPARTMENT

Securely store grievance records and report a summary of grievances and actions to senior management quarterly; include anonymized data in annual compliance reports.

Ongoing / quarterly

GRIEVANCE MECHANISM & CONTACT

If you come across any instance of non-compliance or deviation from our Ethical Policy — or wish to raise a grievance or request a copy of our annual sourcing compliance report — please contact our Compliance Officer. Full confidentiality is guaranteed.

COMPLIANCE OFFICER

Ms. Kinjal Shah

accounting@snjny.com

(212) 575-0111

ESCALATION

Senior Management

gunjan@snjny.com

OFFICE

580 Fifth Avenue, Suite 1002

New York, NY 10036

PREPARED BY

Compliance Officer

APPROVED BY

Top Management

DATE

7 April 2026

REFERENCE

Issue No. 2