



01/02/2024

Supply Chain Policy & Procedure

1. IDD USA LLC is a Diamond / Jewelry Trading Company. This policy confirms IDD USA LLC commitment to respect human rights, avoid contributing to the finance of conflict and comply with all relevant UN sanctions, resolutions and laws.
2. IDD USA LLC 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 Labor Organization Fundamental 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; and
 - enable stakeholders to voice concerns about the jewelry supply chain.
 - 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. Mapping the supply chain assessing the risk establishing controls, visiting and auditing suppliers, and reporting publicly on the Web Site.
3. We also commit to using our influence to prevent abuses by others. Our supplier is not from CAHRA and we do not procure goods from CAHRA. Our Supplier is RJC Certified member and hence is compliant to OECD Guidelines.
4. Regarding serious abuses associated with the extraction, transport or trade of diamonds/colored gemstones: -
We will neither tolerate nor profit from, contribute to, assist or facilitate the commission of:
 - torture, cruel, inhuman and degrading treatment;
 - forced or compulsory labor;
 - the worst forms of child labor;
 - human rights violations and abuses; or
 - war crimes, violations of international humanitarian law, crimes against humanity or genocide.
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/colored gemstone 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/colored 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 diamonds/colored gemstones are traded and upstream actors in the supply chain; or
 - tax or extort money or diamonds/colored gemstones at mine sites, along transportation routes or at points where diamonds/colored gemstones 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/colored 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/colored gemstones, 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/colored gemstones.
11. Reporting: -
a. We shall report any potential adverse impact findings on the website. We plan to report this on annually.
b. We shall also report if there are no findings
c. We shall also ask our suppliers to conduct a due diligence of their supply chain
d. In case a concern needs to be raised, follow the Grievance Handling Process
12. Grievance Handling Process: -
a. Anyone can raise a grievance or concern in our supply chain.
b. The grievance can be raised on:
i. E-mail: grievance@iddny.com
ii. Telephone: 212-869-0325
iii. Post: Lokendra Jain (Compliance Officer) 545 5th Ave, 10th Floor, New York, NY 10017
c. The Grievances / Concerns shall be handled at the Top Management Level – CEO & COO - and the potential impact and action appropriate to the impact shall be implemented.
d. The action could also be to stop any further business with the business associate in case the impact is severe.
13. We assure all whistle blowers that all the communications will be held in strict confidence and there will be no retaliation of any kind.

Lokendra Jain
C.O.O.