

## **Global Human Rights Policy**

International Gemological Institute (“KJA”) is the world's leading independent diamond, gem, and jewelry grading, education, and appraisal institute since 1975. We operate 29 laboratory locations around the world, grading, natural diamonds, lab-grown diamonds, gemstones and jewelry. Regardless of location or marketplace, an authentic KJA Laboratory Report is the common language of trust and confidence in the gemological world.

We believe our industry must proactively engage in human and environmental stewardship. We strive to champion sustainability across our business operations and remain committed to making positive contributions to the communities in which we operate.

### **OBJECTIVE**

As a purpose-driven organisation, our commitment to upholding human rights defines how we treat each other with dignity and respect as an equal human being whilst celebrating our differences. We recognise our responsibility to respect human rights across our business activities including our own operations and supply chain. We are cognisant of the impacts we have on a wide range of stakeholders including our employees, suppliers, partners, customers and the communities through our activities and business relationships.

Together with our Supplier Code of Conduct, this Global Human Rights Policy articulates our principles on human rights which guide our business strategy and decisions and outlines our commitment to protecting human rights in our operations and beyond.

### **SCOPE**

This policy applies to the entire KJA Group, including all our employees, permanent, temporary and contracted employees and directors at all levels and directors regardless of their location or nature of their activities. The scope of this policy also extends to our suppliers.

### **ROLES AND RESPONSIBILITIES**

KJA’s Chief Executive Officer has oversight of the Global Human Rights Policy who provides periodic updates to the Board of Directors. The CEO is supported by a Human Rights Committee, led by the Chief Operating Officer. The Human Rights Committee comprises senior management from key departments and is responsible for reviewing, monitoring, addressing and reporting human rights risk management. This Policy is approved by the CEO and the Board of Directors.

### **OUR COMMITMENT**

We are committed to complying with all relevant human rights laws and regulations, and upholding international human rights principles throughout our operations and supply chain. Our commitment to respecting and promoting human rights is guided by key principles outlined in international instruments, including the Universal Declaration of Human Rights, the International Bill of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises, and the UN Guiding Principles on Business and Human Rights.

## **Human Rights Due Diligence**

We are committed to conducting periodic human rights due diligence to identify, assess, mitigate and remediate potential and actual human rights risks within our operations and supply chain.

## **OUR HUMAN RIGHTS POLICY COMMITMENTS**

### **Child Labor**

- Children have the right to be protected from work that is dangerous or harmful to their education, health, or development, as well as from all other forms of exploitation, as per the Convention on the Rights of the Child.
- In line with our commitment to preventing child labor in all our operations, we strictly prohibit any form of employment for persons under the age of 15, regardless of the local minimum age.
- All job applicants' ages and identities are verified by checking government-issued identification documents.
- When individuals under the age of 18 are hired, strict regulations must be applied to ensure that job tasks and working hours are age-appropriate. They are prohibited from exposure to harmful substances and other health risks.

### **Forced Labor**

- Any form of forced or compulsory labor is prohibited in our operations and supply chain.
- All employment contracts are signed on a voluntary basis.
- Malpractices that may potentially lead to forced labor, including the retention of original personal identification documents and the payment of recruitment fees by employees, are strictly prohibited in all our operations worldwide.

### **Modern Slavery**

- Modern slavery encompassing child labour, forced labour and human trafficking, and others such as indentured labour and descent-based slavery are strictly not tolerated.
- Workers should never be forced against their own will and rights to work, especially in non-ideal working conditions.
- Under no circumstance will KJA engage in any form of modern slavery.

### **Non-discrimination**

- As a company with global presence, we embrace a diverse and inclusive workforce and create an environment in which our differences are treated fairly and celebrated. We strive to create and maintain a working environment where discrimination and harassment are not tolerated.
- We expect our employees to treat other internal and external stakeholders with dignity and respect.
- Throughout the entire lifecycle of an employment from hiring, training, career development to promotion, we adhere to the principles of equal opportunities for all employees, regardless of race, ethnicity, gender, sexual orientation, language, political

opinion, religion, disability, socio-economic background or any other characteristic protected by law.

### **Harassment**

- We have a zero-tolerance policy for harassment in any form. We strictly prohibit all forms of harassment, including sexual harassment, bullying, and other unwelcome behaviors or threats that may cause harm, trauma, or distress.
- We are committed to providing a safe and respectful work environment for all employees, ensuring protection against sexual harassment and other forms of misconduct.

### **Freedom of Association and Collective Bargaining**

- We respect our employees right to freedom of association and collective bargaining as permitted by respective local laws.
- We promote communication channels for our employees to express their concerns and take part in decision-making process concerning their rights and interests.

### **Fair Wages and Working Hours**

- We are committed to compensating our employees fairly based on their performance and merits. Employees must be paid at least the legal minimum wage.
- Wages must be paid in a timely manner, at regular intervals, and in full as stipulated in the employment contract. Overtime and work during atypical hours will also be compensated in accordance with local labor laws and regulations.
- All employees shall be provided with adequate rest and breaks to ensure their well-being, including at least 24 hours of uninterrupted rest every seven days.

### **Health & Safety**

- We are committed to ensuring safety, health, and hygiene in all our workplaces. Our policy is to provide a safe and healthy work environment, complying with applicable safety and health laws, regulations, and internal standards.
- Our commitment includes identifying and assessing potential occupational health and safety risks in our operations and schools. These risks are mitigated through robust measures such as preventive measures, awareness training, provision of personal protective equipment (PPE), and regular maintenance and inspection of our equipment.
- Suppliers are expected to join us in our continuous efforts to identify and mitigate risks to ensure a safe working environment.

### **Workplace Security**

- We are committed to maintaining a workplace free from violence, harassment, intimidation, and other unsafe conditions caused by internal or external threats.
- We implement necessary security measures to protect employees and our operations, ensuring these safeguards uphold their privacy, dignity, and fundamental rights. Our security guidelines and management processes respect human rights, ensuring a secure environment for successful business operations.

## **Privacy**

- We are committed to safeguarding the privacy and personal data of our employees and those who entrust their personal information with us.
- Upholding the principles of human dignity and respect, we ensure that all data collection, storage, and usage practices comply with applicable privacy laws and regulations.

## **POLICY IMPLEMENTATION**

### **Communication**

This policy will be communicated to all employees via internal communication channels, made available on the KJA website for external stakeholders, and included in the Supplier Code of Conduct for suppliers.

### **Suppliers and Contractors**

We expect our suppliers and contractors to respect human rights, adhere to international human rights standards and local regulations, and align with this policy.

### **Grievance Mechanism**

- All our employees have the right and duty to report concerns relating to the application or suspected breach of this policy without fear of retribution. We ensure that raising concerns about issues relating to human rights and their associated impact at work is treated with the utmost confidence and, unless legally prohibited, with anonymity.
- We strictly prohibit any form of retaliation against whistleblowers acting in good faith to report a concern or assist with an investigation. Once a complaint is received, KJA will acknowledge the receipt, investigate, and assess each reported case in a timely manner. We will take necessary action to mitigate actual or potential negative human rights impacts and continue to monitor the effectiveness of our grievance mechanism regularly.

Any concerned individual, including KJA's internal and external stakeholders, can report their concerns via our confidential whistleblowing channel at [compliance@kja.org](mailto:compliance@kja.org).

### **Remediation**

Where human rights violations have occurred and stakeholders have experienced actual adverse impacts caused by or directly contributed to by our activities, we are committed to providing remediation and sanctioning the behaviors that led to such violations. We expect our suppliers and business partners to cooperate and commit to the investigation and remediation of these human rights violations.

### **Training**

All KJA employees and contractors are required to complete mandatory human rights training during onboarding.

## **Monitoring**

- Business entities within the Group are responsible for monitoring compliance with this policy, completing an annual self-evaluation to demonstrate adherence, and undergoing independent verification every three years.
- We are committed to regularly monitoring our business partners' commitment to and compliance with our Supplier Code of Conduct through self-questionnaires and, in high-risk circumstances, onsite audits by a third-party provider. The risks associated with engaging a supplier or business partner are first determined internally through our human rights due diligence process and impact assessments.
- If a supplier is found to have breached our Supplier Code of Conduct or committed a violation of human rights, they will be required to remediate and submit a corrective action plan. Suppliers face potential termination of the partnership should they fail to remediate.

## **Reporting**

We are committed to publicly reporting on our human rights commitments, measures, and performance through our Human Rights Report, referencing the UN Guiding Principles Reporting Framework.

## **Non-Compliance**

Non-compliance with the principles outlined in this Policy constitutes a breach of Company policy and procedures and may lead to remedial and/or disciplinary actions.

## **Review**

Management will review and update this policy every two years as necessary.