

Document Name: Policy Statement on Child Labour

Document Number: OJC - POL - 001

Document Effective: 08th January 2024

Last Review Date: 08th January 2025





#### Policy Statement on Child Labour

The policies relating to this section are part of the Business Policies adopted by Omega Jewelry Casting LLC and are presented below for reference:

- a. No form of child labour should be employed at Omega Jewelry Casting LLC
- b. Omega Jewelry Casting LLC shall not employ any persons under the age of 18, the age for completing compulsory education, the legal minimum age for employment in the country, or the minimum age permitted under ILO standards, whichever standard is greatest.
- c. Omega Jewelry Casting LLC shall maintain adequate human resource systems and practices to verify that each employee meets the minimum age requirement. Such systems and practices include a written hiring policy, training of hiring personnel, requiring "proof of age" documentation at the time of hire, and record keeping.
- d. Omega Jewelry Casting LLC shall take reasonable measures to ensure that such proof of age documents are accurate and complete.
- e. For authorized adolescents (persons below 18 years of age), the entity management is responsible for providing working conditions, hours of work and wages in compliance with applicable local laws as a minimum.
- f. Omega Jewelry Casting LLC shall not engage in or support any form of child slavery, debt bondage, trafficking of children, forced child labour or use of children in armed conflict.
- g. If a child is found working at Omega Jewelry Casting LLC either own or subcontracted, the responsibility of rehabilitation will be undertaken by the management.
- h. The above policies will also be applicable to subcontracted labour.

Ву,

Omega Jewelry Casting LLC



Document Name: Policy Statement on Forced Labour

Document Number: OJC – POL – 002

Document Effective: 08th January 2024

Last Review Date: 08th January 2025





#### Policy Statement on Forced Labour

The policies relating to this section are part of the Business Policies adopted by Omega Jewelry Casting LLC and are presented below for reference:

- a. The management of Omega Jewelry Casting LLC are fully committed to ensuring that forced or involuntary, bonded, indentured or prison labour, is not practiced nor used in any form at any of its facilities. Omega Jewelry Casting LLC shall ensure that there is no restriction in the freedom of movement of employees and dependents. Any reported incidents relating to forced labour will be considered as a serious violation of the Business Policies.
- b. The following definitions will be applicable:
  - The Universal Declaration of Human Rights that 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 extracted from any person under the menace of any penalty, and for which the said person has not offered himself voluntarily"

By,

Omega Jewelry Casting LLC



Document Name: Freedom of Association & Collective Bargaining

Document Number: OJC - POL - 003

Document Effective: 08th January 2024

Last Review Date: 08th January 2025





# Statement on Freedom of Association, Collective Bargaining, Discrimination and Discipline and Grievance Procedure

The policies relating to this section are part of the Business Policies adopted by Omega Jewelry Casting LLC and are presented below for reference:

- a. Omega Jewelry Casting LLC will not prevent employees from associating and collective bargaining.
- b. Discrimination can mean distinction, exclusion or preference.
- c. Any form of discrimination relating to the hiring, discharge, pay, promotion and training of employees on the basis of race, ethnicity, caste, national origin, religion, age, disability, gender, LGBTQ, marital status, physical appearance, sexual orientation, HIV status, Migrant status, membership of worker representative bodies, political affiliations, or any criteria that are unlawful is strongly discouraged by Omega Jewelry Casting LLC and any such reported incidents will be viewed as a serious violation of this Business Policies.
- d. Omega Jewelry Casting LLC will ensure that employees who have certain lifethreatening 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.
- e. Individuals who are "Fit for Work" shall be accorded equal opportunities and shall not be discriminated against on the basis of factors unrelated to their ability to perform their job.



- f. Omega Jewelry Casting LLC shall not use corporal punishment under any circumstances and will ensure that employees are not subjected to harsh or degrading treatment, sexual or physical harassment or other forms of mental or physical coercion, abuse or intimidation.
- g. Omega Jewelry Casting LLC encourages all personnel to voice concerns promptly, if they have a genuine reason to believe that a policy, entity operation or practice is or will likely be in violation of any law, regulation or internal entity rule or policy, including this Business Policies.
- h. Omega Jewelry Casting LLC assures all employees who come forward in good faith to report Issues, that they will be treated fairly and respectfully. While all efforts will be taken to protect the anonymity of employees as far as practicable, any form of retaliation against any such individuals, assuming they have not been involved in the violation, will not be tolerated.

By,

Omega Jewelry Casting LLC



Document Name: General Employment, Working Hours & Remuneration

Document Number: OJC - POL - 004

Document Effective: 08th January 2024

Last Review Date: 08th January 2025





## Policy Statement on General Employment, Working Hours& Remuneration

The policies relating to this section are part of the Business Policies adopted by Omega Jewelry Casting LLC and are presented below for reference:

- a. Omega Jewelry Casting LLC complies with applicable national laws / regulations with respect to employment.
- b. Omega Jewelry Casting LLC is committed to maintaining appropriate records as stipulated by the regulatory authorities for all staff employed, whether on a full time, part time or seasonal basis.
- c. Omega Jewelry Casting LLC shall not require workers to work for more than the national limit of hours in a week on a regular basis, with overtime hours not to exceed the national permitted limit per week on a regular basis unless there are legal opt-outs.
- d. Omega Jewelry Casting LLC shall ensure that wages and benefits for a standard working week shall meet at least national minimum standards and shall be sufficient to meet the basic needs of workers.
- e. Wages shall be paid to employees on a regular and predetermined basis in a manner and location convenient to employees, accompanied by a wage slip detailing wage rates, benefits and deductions as applicable.
- f. Omega Jewelry Casting LLC shall ensure that due process of wage deductions shall be followed where applicable and it shall not be binding on employees to buy provisions from the group.
- g. When required, due recognition will be given to the existence, membership and



lawful activities of worker representative bodies, and worker representatives will be given access to carry out their responsibilities / functions.

- h. Omega Jewelry Casting LLC is committed to addressing the legitimate grievances of its employees.
- i. Omega Jewelry Casting LLC shall follow proper procedure as per law for dismissal of employees, in case the need for the same arises, and arbitrary dismissal procedures shall be avoided.
- j. Information regarding applicable employment policies and working practices shall be communicated in a transparent manner to all employees.
- k. Omega Jewelry Casting LLC is fully committed to the pursuance of the provision of fair and conducive employment conditions, consistent with applicable laws and regulations.

By,

Omega Jewelry Casting LLC



Document Name: Policy Statement on Health and Safety

Document Number: OJC - POL - 005

Document Effective: 08th January 2024

Last Review Date: 08th January 2025





#### Policy Statement Health and Safety Policy

The policies relating to this section are part of the Business Policies adopted by Omega Jewelry Casting LLC and are presented below for reference:

Omega Jewelry Casting LLC recognizes the need to develop a sustainable, value creating business and is committed to the following in the areas of workplace health and safety:

- a. Providing safe and healthy working conditions for all employees in accordance with applicable law and other relevant industry standards.
- b. Any adverse impact of our business processes on those who carry it out shall be identified and eliminated. Towards this end, we will systematically review our operations to identify sources of health and safety related risks.
- c. We will provide adequate and appropriate labeling and storage of all chemicals and cleaning materials and adopt methods to protect employees from exposure to airborne particles and chemical fumes
- d. Our review of our processes will use appropriate standards as required by prevailing laws, expert opinion, feedback from workers and our knowledge of best practices. The review will lead to formulation of clearly described work practices and safety drills and appropriate safeguards and isolation from mobile equipment. All our staff will be trained in the manner required to adhere to these work practices and drills.
- e. Workers shall not be under the influence of or abusing, drugs, alcohol and/ or other illegal substances.
- f. We will seek to substitute the use of material, which are known to cause an adverse impact on the health of workers or health of consumers in the course of its use.
- g. All workplaces will be constructed to meet safety standards with local regulations as the minimum standards that will be applicable.
- h. We will take adequate measures to safeguard our employees from fire and other workplace injuries.
- i. All products sold by Omega Jewelry Casting LLC to consumers shall comply with applicable regulations of product health and safety.

By,

Omega Jewelry Casting LLC



Document Name: Environmental protection, Hazardous substances, waste and Emissions,

Use of Energy and natural resources

Document Number: OJC - POL - 006

Document Effective: 08th January 2024

Last Review Date: 08th January 2025





# Policy Statement of Environment protection, Hazardous substances, waste and Emissions, Use of Energy and natural resources

The policies relating to this section are part of the Business Policies adopted by Omega Jewelry Casting LLC and are presented below for reference:

Omega Jewelry Casting LLC is committed to effective environmental performance and will focus on the following initiatives:

- Conduct business in an environmentally responsible manner.
- Compliance with all applicable environmental laws and regulations
- The impact of our operations on the environment will be assessed and reviewed periodically to mitigate or eliminate such impact.
- Disposal procedures for waste generated will be clearly defined and practiced in line with standards that are set by law.
- Improvement of employee environmental awareness and performance through training.
- Efficient use of energy and natural resources to minimize waste generation through efforts that include recycling and prevention of pollution.
- Commitment to a continual improvement process in environmental management.

Ву,

Omega Jewelry Casting LLC



Document Name: Human Rights Policy

Document Number: OJC – POL – 007

Document Effective: 08th January 2024

Last Review Date: 08th January 2025





#### Policy Statement of Human Rights

The policies relating to this section are part of the Business Policies adopted by Omega Jewelry Casting LLC and are presented below for reference:

- a) All employees in Omega Jewelry Casting LLC will be treated with equality, respect and dignity.
- b) Omega Jewelry Casting LLC believes in and respects the fundamental human rights according to the United Nations Universal Declaration of Human Rights.
- c) Omega Jewelry Casting LLC 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
- d) Omega Jewelry Casting LLC strongly discourages any form of sexually coercive, threatening, abusive or exploitative behavior.
- e) Any reported incidents relating to direct or indirect physical, sexual, racial, religious, psychological, verbal, or any other form of harassment or abuse, or any other form of intimidation or degrading treatment will not be tolerated by the Group.
- f) Security personnel, if employed by Omega Jewelry Casting LLC are trained to respect the human rights and dignity of all people and use of minimum force proportionate to the perceived threat.

By,

Omega Jewelry Casting LLC



Document Name: Bribery and Facilitation Payments Policy

Document Number: OJC - POL - 008

Document Effective: 08th January 2024

Last Review Date: 08<sup>th</sup> January 2025





#### Policy Statement of Bribery and Facilitation Payments

The policies relating to this section are part of the Business Policies adopted by Omega Jewelry Casting LLC and are presented below for reference:

- A. Omega Jewelry Casting LLC is committed to prohibit bribery in all business practices and transactions that are carried out by the company or on its behalf by business partners. The company will not offer, accept or countenance any payments, gifts in kind, hospitality, expenses or promises as such that may compromise the principles of fair competition or constitute an attempt to obtain or retain business for or with, or direct business to, any person; to influence the course of the business or governmental decision making process.
- B. Omega Jewelry Casting LLC considers Bribery Risk as it applies to its organization (including agents) to identify which areas pose high risks. Omega Jewelry Casting LLC has developed appropriate methods to monitor conduct of employees and agents and eliminate bribery based on this understanding.
- C. The management of Omega Jewelry Casting LLC facilitates the reporting of incidences of attempted bribery or inappropriate gifts within their organization and shall apply appropriate sanctions for bribery and attempted bribery in all forms.
- D. Omega Jewelry Casting LLC ensures that no employee will suffer demotion, penalty or other adverse consequences for voicing a concern, or for refusing to pay a bribe or facilitation payment even if this action may result in the enterprise losing business.

Ву,

Omega Jewelry Casting LLC



**Document Name: Product Security Policy** 

Document Number: OJC – POL – 009

Document Effective: 08th January 2024

Last Review Date: 08th January 2025





#### Policy Statement of Product Security

The policies relating to this section are part of the Business Policies adopted by Omega Jewelry Casting LLC and are presented below for reference:

- A. Omega Jewelry Casting LLC is committed to establish and implement product security measures within the premises and during shipments to protect against product theft, damage or substitution.
- B. The security and well-being of employees, visitors and other relevant business partners is prioritized when establishing product security measures.

Ву,

Omega Jewelry Casting LLC



Document Name: AML - CFT Policy

Document Number: OJC - POL - 010

Document Effective: 08th January 2024

Last Review Date: 08th January 2025





#### Policy Statement of Money Laundering and Finance Terrorism

The policies relating to this section are part of the Business Policies adopted by Omega Jewelry Casting LLC is presented below for reference:

- A. Omega Jewelry Casting LLC recognizes the fact that entities in the precious metals casting industry, including those engaged in gold, platinum, palladium, and silver casting alloys, have to take on the onus of analyzing their potential vulnerabilities to money laundering and implement specific steps that are required for protection against abuse by criminals.
- B. Strict compliance is required at all times, with all applicable national and, where appropriate, international laws / regulations with respect to money laundering, terrorism financing, bribery, corruption, smuggling, embezzlement, fraud, racketeering, transfer pricing and tax evasion.
- C. Omega Jewelry Casting LLC shall act in accordance with national laws and national / international accounting standards with respect to maintaining financial accounts of all business transactions and auditing of its financial accounts.
- D. Omega Jewelry Casting LLC ensures that concerned employees know and understand the relevant regulatory jurisdiction for national and international transactions, money laundering / financial offences 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 as a violation of the Business Policies, depending on the seriousness of the non-conformance.
- E. Omega Jewelry Casting LLC implements a "Know your Customer" and "Know your Supplier" procedure that establishes the identity of all organizations with which it deals, have a clear understanding of their business relationships and have a reasonable



ability to identify and react to transaction patterns appearing out of the ordinary or suspicious.

- F. Omega Jewelry Casting LLC applies high standards in the selection, screening and acceptance of suppliers and purchasers of precious metal casting alloys, ensuring antimoney laundering policies and procedures are adopted, mandating due diligence during the selection process, continued transaction monitoring and relevant and appropriate worker training.
- G. Financial auditors should be alerted to applicable national legislation imposing special anti-money laundering/combating the financing of terrorism compliance rules on dealers in precious metals or high value goods.
- H. Identification and verification of counterparties, by checking government-issued identification and government listings for money laundering, fraud, involvement in prohibited organizations and/or financing conflict.
- I. Monitoring transactions and report suspicious transactions to relevant authorities.
- J. Maintaining records for at least 5 years (or longer if required by national legislation).
- K. Maintain records of all single or apparently linked cash or cash-like transactions equal to or above \$10,000/- USD or the threshold defined by applicable law (whichever is lower) and, where required by law, implement a process to report such transactions to the relevant designated authority.

By,

Omega Jewelry Casting LLC

Confiler



Document Name: Conflict Minerals Compliance Policy

Document Number: OJC - POL - 011

Document Effective: 08th January 2024

Last Review Date: 08th January 2025





#### Policy Statement Conflict Minerals Compliance

The policies relating to this section are part of the Business Policies adopted by Omega Jewelry Casting LLC is presented below for reference:

- a. Omega Jewelry Casting LLC is fully committed to complying with all applicable legal requirements and responsible sourcing practices concerning Conflict Minerals, as defined under Section 1502 of the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act.
- b. The definition of "Conflict Minerals" refers to gold (commonly referred to as 3TG) that originate from the Democratic Republic of the Congo (DRC) or adjoining countries and are linked to funding armed conflict and human rights abuses.
- c. Wherever applicable, the following affirmative statement should be included on all invoices and supplier declarations:
- d. "The materials supplied comply with the Conflict Minerals requirements as per the Dodd-Frank Act. The supplier confirms that the gold (3TG) used in the product do not originate from conflict-affected and high-risk areas and are sourced responsibly in accordance with the OECD Due Diligence Guidance."
- e. Entering into transactions involving Conflict Minerals that are linked to conflict-affected and high-risk areas, either knowingly or unknowingly, will be considered as a violation of the Business Policies.
- f. Omega Jewelry Casting LLC ensures that concerned personnel within the organization are aware of regulations and customer requirements related to Conflict Minerals, responsible sourcing standards, and due diligence expectations in line with OECD guidelines.

Ву,

Omega Jewelry Casting LLC



Document Name: Product Integrity and Disclosure Policy

Document Number: OJC – POL – 012

Document Effective: 08th January 2024

Last Review Date: 08th January 2025





#### Policy Statement of Product Integrity and Disclosure

The policies relating to this section are part of the Business Policies adopted by Omega Jewelry Casting LLC and are presented below for reference:

- a. Omega Jewelry Casting LLC is committed to complying with relevant trading standards legislation and all applicable national and local regulations related to its products, specifically in the field of casting alloys including gold, platinum, palladium, and silver.
- b. The following essential Policies will be applicable in all transactions of Omega Jewelry Casting LLC involving gold, silver, platinum, palladium casting alloys, and related metallurgical products:
- c. Disclosure Omega Jewelry Casting LLC shall fully and accurately disclose the material characteristics of its products. All reasonable efforts shall be made to disclose key physical and chemical properties, such as alloy composition, fineness/purity (e.g., karat for gold), weight, and any special treatment or formulation applied.
- d. Misrepresentation No untruthful, misleading, or deceptive statement, "representation," or material omission shall be made in the selling, advertising, or distribution of any casting alloy product by the company in any medium, including the internet.
- e. Product Specifications: All casting alloy products shall be described using appropriate terminology and in accordance with recognized industry standards, including specifications for composition, mechanical properties, and applicable purity standards.
  - Full disclosure: The company shall ensure complete and transparent disclosure
    of all relevant information regarding its metal products, including any alloy
    modifications, additions of trace elements, or heat treatments conducted,



irrespective of whether the information is specifically requested.

- Terminology Accuracy: There shall be no misuse of metallurgical or trade terminology, or attempts to disguise product features. Products must be accurately labeled and described, especially where differences in alloy composition or performance exist.
- Brand Integrity: The use of terms such as "gold," "silver," "platinum," and
  "palladium" in branding, trademarks, or trade names shall be used truthfully and
  in alignment with the actual content and quality of the materials being offered.
- f. Omega Jewelry Casting LLC defines its key products and categories as follows:
  - Gold Casting Alloy: A formulated blend primarily containing gold and other metals to achieve specific karat values, flow characteristics, and strength properties for casting applications.
  - Silver Casting Alloy: Silver-based alloy designed for optimal casting performance, sometimes including small percentages of other elements for improved hardness, tarnish resistance, or polish ability.
  - Platinum/Palladium Casting Alloys: Alloys composed primarily of platinum or palladium, with tailored properties to meet precision casting demands, hightemperature performance, and finish quality.
  - Modified or Treated Alloys: Any casting alloy that has undergone intentional modification in formulation, heat treatment, or surface treatment to alter its appearance, workability, or mechanical behavior.

By,

Omega Jewelry Casting LLC



Document Name: Use of Security Personnel Policy

Document Number: OJC - POL - 013

Document Effective: 08th January 2024

Last Review Date: 08th January 2025





#### Policy Statement Use of Security Personnel

The policies relating to this section are part of the Business Policies adopted by Omega Jewelry Casting LLC is presented below for reference:

a. Security personnel, if employed by Omega Jewelry Casting LLC are trained to respect the human rights and dignity of all people and use of minimum force proportionate to the perceived threat.

Ву,

Omega Jewelry Casting LLC



Document Name: Community Engagement and Development Policy

Document Number: OJC - POL - 014

Document Effective: 08th January 2024

Last Review Date: 08th January 2025





### Policy Statement Community Engagement and Development

The policies relating to this section are part of the Business Policies adopted by Omega Jewelry Casting LLC is presented below for reference:

 Omega Jewelry Casting LLC is committed to the development of communities where it operates, contributing to their social and economic welfare.

Ву,

Omega Jewelry Casting LLC



**Document Name: Supply Chain Policy** 

Document Number: OJC – POL – 015

Document Effective: 08th January 2024

Last Review Date: 08th January 2025





#### Policy Statement Supply Chain

The policies relating to this section are part of the Business Policies adopted by Omega Jewelry Casting LLC is presented below for reference:

- The company shall complete the due diligence process prior to initiate business relationship. The company shall purchase precious metals such as Gold Casting Alloys and Karats, Platinum Casting Alloys, Palladium Casting Alloys, and Silver Casting Alloys from legitimate sources only.
- The company shall ensure that all of its respective activities are in line with the OECD Due
   Diligence Guidelines, The Responsible Jewellery Council Standard and as per Universal
   Declaration on Human Rights laid down by United Nations.
- The company shall prohibit any procurement from Conflict-Affected & High-Risk areas and adhere to compliance with standards on Anti-Money Laundering (AML) and Combatting the Financing of Terrorism (CFT).
- Relevant Employees shall be trained on the Supply Chain & Due Diligence Requirement and OECD guideline at regular interval. We shall also provide support to our business partners and stakeholder for the same.
- The company shall carry out risk assessment for its supply chain and shall not enter into any business relationship or if may require then shall suspend/discontinue the engagement with any such supplier involved in dealing with Conflict-Affected and High-Risk areas, Any form of Human Right Violation; Torture, Cruel, In-Human and Degrading Treatment; Forced/Compulsory Labour; Child Labour; Abuses such as widespread Sexual Violence; War Crimes; other serious violations of International Humanitarian Law, Crime against Humanity; Genocide and/or To Bribe or To be Bribed. We strictly condemn and prohibit any Direct/Indirect support to public/private security forces which illegally Control, Tax or Extort money from Mining Sites, Transportation Routes and Upstream Sectors.



- The company shall verify counterparty details, including the Know Your Customer (KYC) for any precious metals supplying Counterparties at regular interval. The company shall carry out risk-based assessment, set appropriate verification control and monitoring of all such commercial activities and transactions.
- The company shall assign responsibility of Supply Chain Integrity and due diligence compliance to senior personnel of the organization to prevent any risk of illegal activities or beach of it. The company shall implement the management strategy to respond to identified risks. For the same, Compliance Officer shall report to Senior Management in case of any such violation of this policy.
- The company has established a risk assessment module and any business partners with high risk rating shall be red flagged and report to be submitted to senior management.

#### Grievance Mechanism

The purpose of this document is to outline a process through which any stakeholder can understand due diligence and supply chain integrity policy of the organization. The identity of the person who so ever has registered a concern shall be kept confidential and no retaliatory action shall be taken against any whistle blower. For anonymous submissions, you may refrain to provide your contact information.

Please share your Complaint/Grievance/Suggestion on mail id available on website.

By,

Omega Jewelry Casting LLC



Document Name: Anti-Harassment or Abuse Policy

Document Number: OJC - POL - 016

Document Effective: 08th January 2024

Last Review Date: 08th January 2025





# Policy Statement of Anti-Harassment or Abuse

The policies relating to this section are part of the Business Policies adopted by Omega Jewelry Casting LLC and are presented below for reference:

- a. All employees in Omega Jewelry Casting LLC will be treated with equality, respect and dignity.
- b. Omega Jewelry Casting LLC create and ensure a safe environment that is free of sexual harassment, including safety from persons/visitors coming into contact at the workplace.
- c. Omega Jewelry Casting LLC will not tolerate any sexual advances, requests for sexual favours, and verbal or physical conduct of a sexual nature are, implicitly or explicitly, made a term or condition of teaching/guidance, employment, participation, or evaluation of a person's engagement in any activity
- d. Omega Jewelry Casting LLC will not tolerate any sexual advances, and verbal, non-verbal and/or physical conduct such as loaded comments, remarks or jokes, letters, phone calls or e-mails, gestures, exhibition of pornography, lurid stares.
- e. Any reported incidents relating to direct or indirect physical, sexual, racial, religious, psychological, verbal, or any other form of harassment or abuse, or any other form of intimidation or degrading treatment will not be tolerated by Omega Jewelry Casting LLC.
- f. Omega Jewelry Casting LLC will take cognizance of complaints about sexual harassment, conduct enquiries, provide assistance and redressal to the victims, recommend punitive action or take immediate action against the harasser, if necessary.



g. Security personnel, employed by Omega Jewelry Casting LLC are trained to respect the human rights and dignity of all people and use of minimum force proportionate to the perceived threat.

Ву,

Omega Jewelry Casting LLC



Document Name: RJC Compliance Policy

Document Number: OJC – POL – 017

Document Effective: 08th January 2024

Last Review Date: 08th January 2025





#### **RJC Compliance Policy**

The Responsible Jewellery Council (RJC) is a not for profit organization with the following mission:

"To advance responsible ethical, social and environmental practices, which respect human rights, throughout the supply chain, from mine to retail"

RJC's "Code of Practices 2024" and "Chain of Custody 2024" defines responsible ethical sourcing, supply chain, human rights, diversity & inclusion, social, health & safety and environmental practices, applicable to all RJC members.

Omega Jewelry Casting LLC has become a member of RJC and is fully committed to the Code of Practices and Chain of Custody.

We strongly encourage all our business partners to follow and implement the various requirements of the RJC system. More information about the Program is available on the internet site <a href="http://www.responsiblejewellery.com">http://www.responsiblejewellery.com</a>.

We encourage your co-operation in adopting the standard and ensuring that the entire industry is seen as a role model in setting high standards with respect to business, social and environmental responsibilities.

Bγ,

Omega Jewelry Casting LLC



Document Name: Policy Statement on ESG & Sustainability

Document Number: OJC - POL - 018

Document Effective: 08th January 2024

Last Review Date: 08th January 2025





## Policy Statement on ESG & Sustainability

The policies relating to this section are part of the Business Policies adopted by Omega Jewelry Casting LLC is presented below for reference:

- Omega Jewelry Casting LLC is committed to responsible business practices aligned with the Responsible Jewellery Council (RJC) Code of Practices and Chain of Custody, USA regulations, and international standards.
- We ensure all gold, platinum and silver casting activities are free from association with human rights abuses, conflict financing, money laundering, terrorism, and corruption.
- Our sourcing and procurement follow the OECD Due Diligence Guidance to ensure traceability, legitimacy, and ethical origin of precious metals.
- We uphold labor rights by strictly prohibiting child labor, forced labor, and discrimination, and by ensuring fair wages, safe working conditions, and equal opportunity.
- Environmental responsibility is a core value—we aim to reduce our environmental footprint through waste reduction, energy efficiency, and compliance with all local environmental laws.
- All employees, suppliers, and partners are expected to follow our ESG principles and are encouraged to report any grievances or violations through secure, nonretaliatory channels.
- We maintain strong governance through internal controls, anti-bribery policies, transparent decision-making, and lawful conduct across all levels of operation.
- ESG commitments are embedded into daily business operations, with leadership accountability and employee awareness ensured through regular training and communication.
- We regularly review, monitor, and improve our ESG practices and fully cooperate with third-party verifications and RJC audits to demonstrate compliance and transparency.



Omega Jewelry Casting LLC is dedicated to operating as a responsible and sustainable business. By integrating ESG principles into our core operations, we aim to create long-term value for our stakeholders and contribute positively to society and the environment. We believe that our commitment to sustainability is essential for the success and resilience of our business and the well-being of our planet.

Ву,

Omega Jewelry Casting LLC



Document Name: Whistleblower Policy

Document Number: OJC – POL – 019

Document Effective: 08th January 2024

Last Review Date: 08th January 2025





## Policy Statement of Whistleblower

The policies relating to this section are part of the Business Policies adopted by Omega Jewelry Casting LLC and are presented below for reference:

- a. The policy ensures that all employees, contractors, and stakeholders of Omega Jewelry Casting LLC can report concerns about illegal, unethical, or improper conduct without fear of retaliation.
- b. Applies to all individuals working at all levels, including directors, officers, employees (permanent, part-time, or temporary), consultants, vendors, and suppliers.
- c. Encourages reporting of concerns related to fraud, theft, bribery, health and safety violations, environmental non-compliance, harassment, abuse of authority, or other misconduct.
- d. Reports may be made anonymously through designated email, phone hotline, or physical drop box, maintained in a secure and confidential manner.
- e. All complaints and disclosures will be treated with strict confidentiality and will only be shared with those necessary for investigation and resolution.
- f. No retaliation, discrimination, or harassment will be tolerated against any whistleblower who makes a report in good faith.
- g. Individuals who knowingly submit false or malicious complaints may face disciplinary action.
- h. The Compliance Officer or designated Ethics Officer will be responsible for investigating all reports received.
- i. Investigations will be conducted impartially, thoroughly, and as quickly as possible, with appropriate corrective action taken where necessary.



- j. Whistleblowers will be kept informed of the outcome of their disclosure, within legal and confidentiality constraints.
- k. All records of complaints, investigations, and outcomes will be maintained securely for a minimum period of five years.
- I. Awareness of this policy will be included in employee onboarding and periodic ethics training programs.
- m. This policy is reviewed annually and updated as required to ensure continued relevance and compliance with applicable laws of the State of New York and federal regulations.

By,

Omega Jewelry Casting LLC



Document Name: Diversity, Equity and Inclusion Policy

Document Number: OJC – POL – 020

Document Effective: 08th January 2024

Last Review Date: 08th January 2025





#### Policy Statement of Diversity, Equity and Inclusion

The policies relating to this section are part of the Business Policies adopted by Omega Jewelry Casting LLC and are presented below for reference:

- a. Omega Jewelry Casting Inc. is committed to fostering a diverse, equitable, and inclusive workplace where all employees are treated with dignity and respect.
- b. All employment-related decisions, including recruitment, hiring, training, promotion, compensation, and termination, will be made fairly and without discrimination based on race, color, religion, gender, sexual orientation, gender identity or expression, age, national origin, disability, veteran status, or any other status protected by law.
- c. The company will promote equity by ensuring equal access to opportunities, resources, and career advancement for all employees.
- d. An inclusive work environment will be maintained where every individual feels valued, supported, and empowered to contribute their best.
- e. Harassment, bullying, discrimination, or retaliation of any kind will not be tolerated under any circumstances.
- f. The company will provide reasonable accommodations to individuals with disabilities to ensure full participation in the workplace.
- g. Training and awareness programs will be conducted to increase understanding of diversity, equity, and inclusion across all levels of the organization.
- h. Transparent and unbiased hiring and promotion practices will be implemented to minimize the impact of unconscious bias.
- i. Leadership and management will be held accountable for upholding and promoting DEI values within their teams.



- j. Employees are encouraged to voice concerns, and a confidential reporting mechanism will be available to address any DEI-related issues without fear of retaliation.
- k. Regular reviews will be conducted to evaluate DEI policies, practices, and outcomes, ensuring continuous improvement.
- I. The company will extend its DEI commitment by engaging with diverse suppliers and partners in its operations.
- m. Employee resource groups, cultural events, and initiatives that strengthen inclusivity and belonging will be supported.
- n. Progress on DEI objectives will be measured, tracked, and communicated transparently to all stakeholders.

Ву,

Omega Jewelry Casting LLC