

420 MADISON AVENUE, 16TH FLOOR,
NEW YORK, NY, 10017

CODE OF CONDUCT

Business Ethics

1. We are committed to conducting our businesses to a high ethical standard, and to ensuring integrity, transparency and conformance with Applicable Law.
2. We will not engage in Bribery and/or corruption.
3. We will not tolerate Money Laundering and/or financing of terrorism.
4. We will adhere to the Kimberly Process Certification System and the World Diamond Council voluntary System of Warranties. We will not deal in conflict diamonds.
5. We will fully and accurately disclose the material characteristics of the products that we send you.
6. We will take reasonable measures to ensure the physical integrity and security of product shipments.
7. We will respect commercial confidentiality and data privacy.

Human Rights and Social Performance

1. We believe in and will respect the fundamental human rights and the dignity of the individual, according to the United Nations Universal Declaration of Human Rights.
2. We will not tolerate the use of Child Labour or forced, bonded, indentured or prison labour, nor restrict the freedom of movement of Employees and dependents.
4. We are committed to high standards of Health and Safety in our operations.
5. We will not prevent workers from associating freely.
6. We will not discriminate based on race, ethnicity, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, marital status, physical appearance, age, or any other applicable prohibited basis in the workplace.
7. We will not use corporal punishment under any circumstances and will prohibit the use of degrading treatment, harassment, abuse, coercion or intimidation in any form.
8. We will adhere to working hours and remuneration legislation.

Environmental Performance

1. We will conduct our business in an environmentally responsible manner.
2. We will manage our environmental footprint by eliminating or minimizing negative environmental impacts.
3. We will comply with all applicable environmental Regulations

Legal Compliance

1. Kimberly / WDC System of Warranties – Conflict Free Diamonds
2. Irradiated Gemstone Requirements and Statutes
3. Colored Diamond Requirements and Statutes
8. FCPA-Foreign Corrupt Practices Act
9. Patriot Act (Anti-Money Laundering) AML Program
10. OECD Guidelines for responsible supply chain
11. Dodd Frank Act