



Corporate Responsibility Policy

Aim & Objective



The Code of Conduct & Business Ethics is a commitment made by Pala Diamond Co. to uphold responsible business practices, but it is also a guide to other stakeholders and should serve as a key requirement of any business partnership that the company may have.

Our sincere aim is to be a trusted part of a responsible, world-wide supply chain for the sourcing and supply of diamonds; to this end, we are committed to promoting trust and transparency in the diamond, gemstone, gold, silver, PGM and fine jewellery industries. Our Corporate Responsibility Policy sets the commitments we have to a range of issues pertaining to our own business and its influence on society and the environment. This policy should be read in conjunction with other relevant documents such as our Code of Conduct & Business Ethics and Responsible Sourcing Policy.

01. Employment, Safety & Well-being



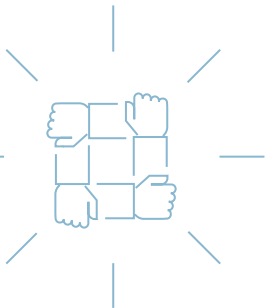
- We are a responsible employer, providing safe working conditions, encouraging well-being and protecting fairness, equality, respect and dignity
- We ensure our employees work in an environment free from discrimination, harassment and bullying and that all employees have recourse to raise matters of concern confidentially without fear of retaliation or loss of employment
- We provide all employees with access to their employment contracts, ensuring these are all in alignment with UK and relevant international employment law
- We contractually comply with all other aspects of UK employment law including PAYE, pensions and working conditions
- We provide a safe physical working environment, with safety measures and well-communicated emergency procedures along with clearly assigned roles and responsibilities

02. Environment



- We commit to minimising our environmental footprint and, where possible, leverage our business relationships to influence our supply chain partners to do the same
- We internally monitor our consumption of electricity, business travel and generation of waste so we can trial ways to reduce our impact
- We encourage employees to suggest ways for us to become a more environmentally responsible company

03. Community



- We actively seek to support members of the community in which we operate
- We seek ways to support young people with opportunities for work experience by collaborating with businesses and training organisations in our sector
- Any potential philanthropic or charitable relationships we have will be independent of direct connections to employees and shall be politically and religiously neutral in nature

04. Governance & Transparency

We commit to:

- Being an open and transparent business, publicly providing information about directors, accounts and other business transactions
- Hold policies and procedures relevant to our size of business and openly publish key policies
- Track, monitor and register the development of legislative or other legal requirements on the business and assess the relevant risks of these on the company
- State any declarations or conflicts of interest to relevant investors, stakeholders or business partners

05. Responsible Sourcing



We commit to source responsibly in accordance with relevant external due diligence guidance, including but not limited to:

- The Responsible Jewellery Council's Codes of Practice
- The Responsible Jewellery Council's Chain of Custody requirements
- Kimberley Process of Certification Systems
- World Diamond Council System of Warranties
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas





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