

## **Announcement**

**No. 25/2022**

### **Supply Chain Policy**

Well Field Corporation Co., Ltd. is recognized as one of the world's major jewelry and gems center, our company emphasize on creating value and success with our customers through Costume jewelry and accessories' development and production. This policy confirms our commitment to respect human rights, avoid contributing to the finance of conflict, and comply with all relevant UN sanctions, resolutions, and laws..

Well Field Corporation Co., Ltd. is a certified 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 Labour 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 jewellery 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.

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;

The company shall verify counterparty details, including the Know Your Customer (KYC) for any precious gems stones 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 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.

**Regarding serious abuses associated with the extraction, transport or trade of gold, Silver, PGMs metals Diamond and Gems Stones**

We will neither tolerate nor profit from, contribute to, assist or facilitate the commission of: torture, cruel, inhuman and degrading treatment; forced or compulsory labour; the worst forms of child labour; human rights violations and abuses; orwar crimes, violations of international humanitarian law, crimes against humanity or genocide.

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.

**Regarding direct or indirect support to non-state armed groups**

We only sell or purchase diamonds/coloured gemstones 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/coloured gemstones from, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates who illegally:

- a. control mine sites, transportation routes, points where diamonds/coloured gemstones are traded and upstream actors in the supply chain; or
- b. tax or extort money or diamonds/coloured gemstones at mine sites, along transportation routes or at points where diamonds/coloured gemstones are traded, or from intermediaries, export companies or international traders.

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.

**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.

**Regarding bribery and fraudulent misrepresentation of the origin of diamonds/coloured gemstones**

We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of gold, Silver, PGMs metals Diamond and Gems Stones, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of diamonds.

**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/coloured gemstones.

**Grievance Mechanism**

Well Field Corporation Co., Ltd. has established this grievance procedure to hear concerns about circumstances in the supply chain involving gold, Silver, PGMs metals Diamonds, and Gems Stones from conflict-affected areas.

Well Field Corporation Co., Ltd. is responsible for implementing and reviewing this procedure. Concerns can be raised by interested parties via email or telephone to



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On receiving a complaint, we will aim to:

- Get an accurate report of the complaint and explain our complaint procedure.
  - Find out how the complainant would like it addressed/ resolved.
  - Assess the eligibility of the complaint and, where applicable, decide who should handle it internally. In cases where we are unable to address the complaint internally (e.g. where our company is too far removed from the origin of the issue raised in the complaint) , we may redirect it to a more appropriate entity or institution, such as the relevant supplier or industry body.
  - Where the issue can be handled internally, seek further information where possible and appropriate.
  - Identify any actions we should take including hearing from all parties concerned, and monitoring the situation.
- Advise the complainant of our decisions or outcomes.
- Keep records on complaints received and the internal process followed, for at least five years.

Announced on December 23, 2022



Well Field Corporation Co., Ltd.