



Thousand Million Jewelry
Manufacturing

Supplier Code of Conduct

Thousand Million Jewelry Manufacturing Ltd's activities, on behalf of its customers, rely on sourcing from conflict-free diamond certified Suppliers around the world. We work with our global supply chain to cultivate safe working conditions, to foster dignity and respect for workers and to promote responsible environmental practices.

Our **Supplier Code of Conduct** and accompanying Standards detail the principles and practices that we expect our Suppliers to uphold. The Code, which is based on local, national laws/ regulations, the International Labor Organization's (ILO) core conventions, and internationally recognized occupational health, safety, and environmental standards, represents our commitment to source goods from Suppliers who value and incorporate those provisions into their operations.

Although Suppliers' employees in different departments have varied natures of work, the Supplier Code of Conduct is applicable to all worksites utilized for Thousand Million Jewelry Manufacturing's sourcing and associated onsite residential facilities.

Legal practices

- Thousand Million Jewelry Manufacturing's suppliers shall respect and comply with all applicable international, national and local laws, rules and regulations which are relevant to the diamond industry and to the lawful conduct of business generally.
- Suppliers shall be in accordance with all regulatory provisions of the **Kimberley Process** (a joint initiative of governments, the international diamond industry, and civil society to stem the flow of conflict diamonds).
- Suppliers shall respect all domestic and international Anti-money laundering laws, rules and regulations which seek to halt use of diamonds for any illegal or illicit purposes.
- Suppliers shall follow laws, rules, regulations and industry-developed standards requiring full and honest disclosure in the advertisement, sale and distribution of industry products.

Labor practices

- Business licenses shall be accurate, valid, and up-to-date, as required by law. All postings meet or exceed legal requirements.
- All hiring and termination practices meet or exceed legal requirements. Suppliers impose strict recruitment practices to mitigate the risk of trafficking in persons.
- Employee benefits meet legal requirements.
- Employee working hours and time record keeping meet or exceed legal requirements.
- Employee compensation and payroll record keeping meet or exceed legal requirements.
- Forced, bonded, indentured, slave and prison labor are prohibited.
- Employment of juveniles no younger than 15 years of age, apprentices and trainees meets or exceeds legal requirements.
- Abuse, coercion, harassment and inappropriate disciplinary actions are prohibited.
- Discriminatory practices are prohibited.
- The rights to freedom of association and collective bargaining must be respected.



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Environmental practices

- Environmental management, policies, and postings meet or exceed legal requirements.
- Suppliers shall mitigate adverse environmental impacts. reduce waste and prevent pollution.

Health and Safety practices

- Licenses, permits and certifications shall be accurate, complete, and up-to-date, as required by law. All notices meet or exceed legal regulations.
- Suitable personnel are responsible for emergency response and health and safety.
- Supplier applies and maintains emergency and safety precautions that meet or exceed legal requirements.
- Suppliers provide first aid and medical care that meets or exceeds legal requirements.
- Suppliers report, investigate and address employee and facility accidents in a manner that meets or exceeds legal requirements.
- Personal protective equipment policies, training, provision, maintenance, and use meet or exceed legal requirements.
- Confined spaces and aboveground and underground storage (AST & UST) policies and training are provided.
- Chemicals and hazardous materials management, policies, training, maintenance, storage, and use meet or exceed legal requirements.
- Smoking and activities that involve open flame, fire or ignition are prohibited in designated areas.
- Equipment safety management, policies, training, and maintenance meet or exceed legal requirements.
- Electrical components and systems are properly maintained.
- Noise levels are controlled to meet legal requirements.
- Suppliers maintain a work place that is lit, ventilated and temperature controlled in a manner that meets or exceeds legal requirements.
- Suppliers maintain a clean work environment and provide potable water, restrooms, and showers in a manner that meets or exceeds legal requirements.
- Food preparation areas and child care facilities meet or exceed legal requirements.
- Building and construction permits are maintained and accurate.
- Suppliers implement ergonomics risk programs and provide training for ergonomics awareness.
- Dormitory conditions and emergency and safety precautions meet or exceed legal requirements.

Transparency, Accountability and Ethics

- Suppliers give unhindered access to facility in order to verify compliance and commit to engaging in improvement of identified non-compliances.
- All subcontracting and homework activities must be disclosed and factory must maintain written authorization from Thousand Million Jewelry Manufacturing and/or its customers.
- Fraud, bribery and the undue influencing of a Thousand Million Jewelry Manufacturing employee or designated Thousand Million Jewelry Manufacturing representative are prohibited.

Management Systems

Supplier management establishes policies and systems to manage risk and grievances.