

# Opulence

IMPEX LTD

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Prepared By: Growlity, Inc.



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## Policy Statements

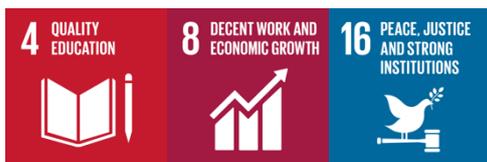
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The policies relating to this section are part of the Business Policies adopted and are presented below for reference:

### 1. Child Labor Policy

- We strictly prohibit the employment of children under the minimum legal age for work, which is 15-18 years old in Thailand.
- The company will establish robust age verification processes during recruitment using national ID cards or birth certificates.
- Employees between the ages of 15 and 18 are considered young workers and are subject to specific legal protections under the Labour Protection Act.
- Young workers are strictly prohibited from engaging in hazardous work, including handling dangerous chemicals or working in environments with excessive noise or dust.
- Young workers may not work between 10:00 PM and 6:00 AM, nor are they permitted to work overtime or on holidays.
- The company will notify a Labour Inspector in writing within seven days of hiring or terminating the employment of any worker under 18 years of age.
- If child labor is discovered, we will take immediate action to remove the child and provide support for their education and remediation.
- We require our suppliers to adhere to equivalent child labor standards and conduct due diligence to ensure a clean supply chain.
- All management and recruitment staff will receive regular training on preventing child labor and age verification techniques.
- The company will maintain secure records of all age verification documents for a minimum of five years for auditing purposes.

#### Impact on SDGs



## 2. Forced Labor Policy

- We have a zero-tolerance policy for all forms of forced, bonded, indentured, or compulsory labor, as well as human trafficking.
- All employment is voluntary; employees have the right to leave after providing a reasonable notice period in accordance with Thai law.
- We do not restrict the movement of employees; workers have free access to their personal identification documents (passports/IDs) at all times.
- The company will not withhold or confiscate any original identity documents or require security deposits from employees.
- We do not require employees to pay recruitment fees; if such fees are discovered to have been paid to third parties, we will facilitate reimbursement.
- All employees receive a clear, written employment contract in a language they understand, detailing wages, hours, and responsibilities.
- We ensure that all job descriptions are truthful to prevent workers from being deceived into forced labor situations.
- We provide specific protections for migrant workers, ensuring they have legal work permits and are not exploited by labor brokers.
- We provide confidential and accessible grievance mechanisms for employees to report concerns about forced labor without fear of retaliation.
- Management and relevant staff are trained to recognize red flags of human trafficking and forced labor in accordance with the Anti-Trafficking in Persons Act.

### Impact on SDGs



### 3. Freedom of Association and Collective Bargaining Policy

- We respect the right of all employees to join, form, or assist labor organizations of their choosing without interference.
- We respect the right of employees to bargain collectively through representatives of their choosing, as protected under the Thai Labour Relations Act.
- We are committed to not discriminating against any employee based on their membership in a labor organization or participation in union activities.
- We encourage open communication and regular dialogue between management and employees regarding working conditions.
- In workplaces with 50 or more employees, we will cooperate with the establishment of an employee committee to consult on welfare and grievances.
- Employees participating in union activities are protected from any form of retaliation, harassment, or adverse employment action.
- The company is committed to engaging in good faith negotiations regarding wages, hours, and terms of employment.
- All interactions regarding freedom of association will be conducted in full compliance with the laws and regulations of Thailand.
- All managers and supervisors are trained on the rights of employees to organize and the importance of adhering to this policy.
- This policy is reviewed annually to ensure it remains effective and aligned with current international labor standards and Thai law.

#### Impact on SDGs



## 4. Employment Policy

- We are committed to complying with all applicable Thai labor laws and regulations concerning all aspects of employment.
- All employees are provided with a written contract detailing job title, salary, benefits, and grounds for termination.
- Standard working hours will not exceed 8 hours per day and 48 hours per week, with at least one rest day per week.
- Overtime work is voluntary and compensated at a rate of 1.5 times the normal wage on regular days and double/triple on holidays.
- We ensure all employees are paid at least the legally mandated provincial minimum wage via bank transfer.
- Employees are entitled to a minimum of 6 days of paid annual leave and at least 13 public holidays per year.
- The company registers all eligible employees with the Social Security Fund and the Workmen's Compensation Fund.
- We base all employment decisions on merit and qualifications, without regard to race, religion, gender, or disability.
- We provide an accessible and confidential process for employees to raise employment-related grievances.
- Termination of employment is handled fairly, providing appropriate notice or compensation in lieu of notice and severance pay where applicable.

### Impact on SDGs



## 5. Health & Safety Policy

- We are committed to providing a safe and healthy working environment, aiming for zero accidents and occupational diseases.
- We comply with the Thai Occupational Health and Safety Act and all related workplace administration regulations.
- We establish and maintain procedures for identifying workplace hazards and implementing control measures to minimize risks.
- The company provides appropriate personal protective equipment (PPE) free of charge to all relevant employees.
- All employees receive health and safety training relevant to their roles, including emergency response and fire safety.
- We encourage employees to participate actively in safety initiatives and report hazards or near-misses immediately.
- We maintain effective emergency response plans, including regular fire drills and clearly marked evacuation routes.
- A senior manager is appointed at each location to be responsible for the implementation of health and safety standards.
- Health and safety performance is regularly monitored and audited to ensure continuous improvement and compliance.
- We ensure on-site access to first aid facilities and provide transportation to external medical services for work-related injuries.

### Impact on SDGs



## 6. Environmental Protection Policy

- We are committed to preventing pollution and minimizing our environmental impact through responsible waste management.
- We comply with all applicable Thai environmental laws, including the National Environmental Quality Promotion and Protection Act.
- We implement procedures for the proper storage, transport, and disposal of hazardous waste through licensed contractors.
- We strive to use energy and water efficiently and promote the recycling of packaging materials where possible.
- We conduct regular environmental risk assessments to identify potential impacts of our gemstone trading operations.
- Environmental considerations are integrated into our business decisions and our selection of supply chain partners.
- Employees receive training to raise awareness about environmental issues and their role in resource conservation.
- We engage with local communities and government bodies on environmental matters related to our business location.
- We maintain all required environmental permits and report performance as required by the Responsible Jewelry Council.
- We aim for continuous improvement and may participate in the Ministry of Industry's 'Green Industry' certification program.

### Impact on SDGs



## 7. Human Rights Policy

- We respect human rights as outlined in the Universal Declaration of Human Rights and the Constitution of Thailand.
- We are committed to non-discrimination, ensuring fair treatment and equal opportunity for all individuals in our business.
- We strictly prohibit the use of forced labor and child labor in any part of our operations or supply chain.
- We respect the rights of employees to associate freely and bargain collectively without fear of reprisal.
- We provide a safe workplace to protect the physical and mental well-being of all our staff.
- We ensure fair wages and reasonable working hours in full compliance with the Thai Labour Protection Act.
- We respect the rights and culture of local communities and ensure our activities do not infringe upon their access to resources.
- We conduct human rights due diligence to identify and mitigate potential negative impacts throughout our gemstone supply chain.
- We provide effective grievance mechanisms for stakeholders to report human rights concerns anonymously.
- Relevant employees receive regular training to ensure they understand and uphold our human rights commitments.

### Impact on SDGs



## 8. Bribery & Facilitation Payments Policy

- We have a zero-tolerance policy for bribery and corruption in all forms, public or private, in Thailand or abroad.
- We explicitly prohibit facilitation payments ("speed money") to secure routine government actions, as per Thai anti-corruption law.
- Gifts or hospitality must not exceed a value of 3,000 Baht per offeror and must be logged in a company gift register.
- We do not make contributions to political parties or candidates to obtain any form of business advantage.
- We maintain accurate and transparent financial records that cannot be used to conceal improper payments.
- Regular risk assessments are conducted to identify business areas susceptible to bribery, such as customs or licensing.
- All employees in procurement, sales, and government relations receive mandatory anti-bribery and corruption training.
- Employees are encouraged to report suspected violations through grievance channels and are protected from retaliation.
- We implement robust internal controls to prevent, detect, and respond to potential acts of corruption.
- We conduct due diligence on third-party agents and partners to ensure they align with our anti-bribery standards.

### Impact on SDGs



## 9. Product Security Policy

- We are committed to protecting our gemstone products from theft, loss, or substitution throughout the supply chain.
- We conduct regular security risk assessments to identify vulnerabilities in our storage and transport processes.
- We implement physical security measures, including secure safes, CCTV surveillance, and restricted access controls.
- We work only with logistics partners who can demonstrate robust security practices for high-value goods.
- We maintain detailed records and a chain of custody for all gemstones to ensure accountability at every stage.
- Employees with access to high-value inventory undergo appropriate background checks as permitted by law.
- We have a formal response plan to investigate security breaches and involve Thai police when necessary.
- We protect confidential product information and client data from unauthorized digital or physical access.
- Employees involved in gemstone handling receive specific training on security protocols and loss prevention.
- We regularly review and upgrade our security technology to meet evolving risks in the gemstone trade.

### Impact on SDGs



## 10. Anti-Money Laundering (AML) & Finance of Terrorism (CFT) Policy

- We are fully committed to complying with the Thai Anti-Money Laundering Act and the Prevention of Terrorism Financing Act.
- We implement a risk-based approach as recommended by the Financial Action Task Force (FATF) for gemstone dealers.
- All international clients and suppliers are screened against the OFAC Specially Designated Nationals (SDN) list.
- We report any cash transaction exceeding 2,000,000 Baht to the Anti-Money Laundering Office (AMLO).
- Any transaction that appears suspicious or inconsistent with a client's profile is reported to AMLO immediately.
- We identify and verify the ultimate beneficial owners (UBO) of all corporate entities we engage with.
- We do not conduct business with entities located in FATF "Blacklisted" jurisdictions without senior management approval.
- All AML/CFT transaction records and identification documents are retained for a minimum of five years.
- A designated Compliance Officer is responsible for overseeing AML procedures and staff training.
- Annual training is mandatory for sales and finance staff on identifying "red flags" like third-party payments.

### Impact on SDGs



## 11. Product Integrity Policy

- We commit to the accurate and honest representation of all gemstones, including origin, quality, and weight.
- We do not make false, misleading, or deceptive claims about our products or their characteristics.
- We adhere to all Thai consumer protection laws and international regulations regarding gemstone disclosure.
- We maintain clear documentation to verify the journey of our gemstones from the source to the customer.
- All gemstone treatments or enhancements must be fully disclosed to the buyer in writing at the point of sale.
- We implement quality control procedures to ensure products match the laboratory certificates provided.
- We ensure our supply chain is free from conflict gems or materials that fund human rights abuses.
- We align our integrity practices with the Responsible Jewelry Council (RJC) Code of Practices.
- Our sales staff are trained to provide accurate technical information and disclosure to all clients.
- We stay updated on the latest gemological technologies to ensure the detection of synthetic or treated stones.

### Impact on SDGs



## 12. Use of Personal Security Policy

- Security personnel are used strictly for the protection of company staff, property, and gemstone assets.
- All security personnel must respect human rights and the dignity of all individuals at all times.
- The use of force is strictly prohibited except in situations of immediate self-defense or the defense of others.
- Security personnel are prohibited from engaging in any form of harassment, abuse, or intimidation.
- All security staff are vetted and receive training on human rights, local laws, and the appropriate use of force.
- The duties and permissible actions of security personnel are clearly defined in written rules of engagement.
- Any incidents involving force or allegations of misconduct are investigated and reported to management immediately.
- Security personnel will cooperate with Thai law enforcement authorities in a lawful and transparent manner.
- Security operations are conducted without bias based on race, gender, religion, or national origin.
- We regularly monitor security deployment to ensure it does not negatively impact the local community.

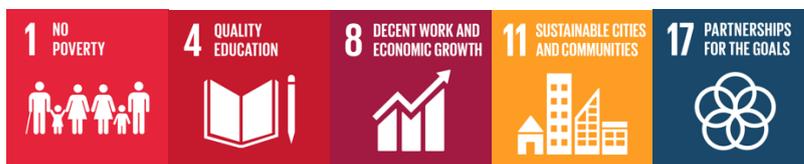
### Impact on SDGs



### 13. Community Engagement & Development Policy

- We respect the rights, culture, and traditions of the local communities in Thailand where we operate.
- We are committed to open and transparent dialogue with community members to understand their concerns.
- We provide a clear grievance mechanism for community members to raise issues related to our operations.
- We aim to contribute to local development through local employment and the procurement of local services.
- We assess the social and environmental impacts of our business and implement measures to mitigate negative effects.
- We engage in meaningful consultation regarding any land use or local resource issues related to our facility.
- We share relevant, non-confidential information about our sustainability performance with local stakeholders.
- We seek to build collaborative partnerships with local NGOs and community groups on social projects.
- We encourage our employees to participate in local community service and volunteer initiatives.
- This policy is reviewed annually to ensure our community contributions remain relevant and effective.

#### Impact on SDGs



## 14. Supply Chain Integrity Policy

- We are committed to sourcing gemstones ethically, free from human rights abuses and conflict funding.
- We implement due diligence processes to assess risks within our supply chain, particularly for high-risk origins.
- We utilize FATF Mutual Evaluation Reports to assess the anti-money laundering robustness of supplier countries.
- We require suppliers to provide a documented chain of custody or "System of Warranties" for all stones.
- We strictly prohibit sourcing from any entity or individual sanctioned by OFAC or the United Nations.
- All primary suppliers must sign our Code of Conduct, committing to zero tolerance for forced and child labor.
- We adopt a risk-based approach, applying enhanced scrutiny to suppliers in conflict-affected areas.
- We work collaboratively with suppliers to help them improve their ethical and environmental performance.
- We ensure there are mechanisms for workers within our supply chain to report unethical practices.
- We publish an annual summary of our supply chain due diligence efforts to stakeholders and the RJC.

### Impact on SDGs



## 15. Anti-Harassment & Abuse Policy

- We are committed to a workplace free from physical, sexual, verbal, or psychological harassment.
- Any form of abuse, including bullying or intimidation, is strictly prohibited and subject to disciplinary action.
- We do not tolerate discrimination based on gender, race, religion, sexual orientation, or disability.
- All employees have the right to work in an environment that respects their personal dignity.
- We provide regular training to all staff on recognizing and preventing workplace harassment and abuse.
- We provide a safe and confidential mechanism for reporting incidents of harassment without fear of penalty.
- All complaints will be investigated promptly, impartially, and with the highest level of confidentiality.
- We take immediate corrective action against any individual found to have violated this policy.
- Retaliation against any employee who reports harassment in good faith is strictly prohibited.
- This policy applies to all levels of the organization, including senior management and external contractors.

### Impact on SDGs



## 16. Responsible Jewelry Council (RJC) Compliance Policy

- We are committed to achieving and maintaining RJC Certification against the 2024 Code of Practices.
- We implement all ethical, social, and environmental standards of the RJC COP throughout our operations.
- We ensure full transparency in our business dealings and maintain the highest ethical standards.
- We uphold the human rights and labor standards defined by the RJC and the Thai government.
- We are committed to environmental responsibility and pollution prevention as mandated by the RJC.
- We ensure product integrity and provide full disclosure to consumers for all gemstone transactions.
- We implement rigorous supply chain due diligence to ensure responsible sourcing of all materials.
- We undergo regular third-party audits to verify our compliance with the RJC framework.
- We are committed to the continuous improvement of our business practices in line with RJC guidance.
- We communicate our commitment to RJC standards to all employees, suppliers, and customers.

### Impact on SDGs



## 17. Diversity, Equity & Inclusion (DEI) Policy

- We are committed to a diverse workplace where all employees feel valued and empowered to succeed.
- We prohibit discrimination on the basis of race, religion, gender, age, or disability in all employment stages.
- We provide equal opportunities for recruitment, hiring, promotions, and professional development.
- We foster an inclusive environment where diverse perspectives are encouraged and respected.
- We are committed to fair compensation practices, ensuring equal pay for equal work regardless of gender.
- We maintain a strict policy against bullying and provide training to promote a respectful culture.
- We ensure fair treatment and support for migrant workers, providing them the same rights as local staff.
- We provide DEI training to reduce unconscious bias and foster an inclusive workplace for all.
- Managers are held accountable for promoting diversity and maintaining a safe environment for their teams.
- We regularly review our DEI metrics and employee feedback to improve our inclusion efforts.

### Impact on SDGs



## 18. ESG & Sustainability Policy

- We integrate Environmental, Social, and Governance (ESG) considerations into our core business strategy.
- We are committed to minimizing our environmental footprint through resource conservation and waste reduction.
- We uphold high social standards by ensuring fair labor practices and respecting human rights.
- We maintain strong governance through transparency, accountability, and ethical conduct.
- We engage with stakeholders to understand their ESG expectations and improve our performance.
- We set measurable sustainability goals and monitor our progress on an annual basis.
- We comply with all relevant Thai ESG-related laws and report our initiatives transparently.
- We encourage innovation to find more sustainable ways of sourcing and trading gemstones.
- We incorporate ESG risks and opportunities into our overall business risk management framework.
- Senior management is personally committed to leading our ESG and sustainability initiatives.

### Impact on SDGs



## 19. KYC (Know Your Customer) Policy

- No business relationship is established without a completed KYC/KYB (Know Your Business) profile.
- We verify government-issued IDs for individuals and Certificates of Incorporation for all corporate clients.
- We perform real-time screening against OFAC, UN, and EU sanctions lists for all new counterparties.
- For high-value transactions, we require documentation proving the legitimate source of funds.
- Customers are categorized as Low, Medium, or High risk based on location and business nature.
- We perform enhanced due diligence (EDD) for Politically Exposed Persons (PEPs) and their associates.
- KYC profiles are refreshed every 1-2 years to ensure all identification data remains current.
- We reserve the right to refuse or terminate business if a client fails to provide required KYC data.
- All collected KYC data is stored securely in compliance with the Thai Personal Data Protection Act (PDPA).
- Staff are trained to identify and report "shell companies" or complex structures that lack transparency.

### Impact on SDGs



## 20. Grievance Policy

- We provide a clear and accessible grievance mechanism for all employees, suppliers, and community members.
- Concerns can be raised via a dedicated email / phone, anonymous dropbox, or directly to the Compliance Officer.
- The identity of the person raising a grievance is kept strictly confidential unless disclosure is legally required.
- We strictly prohibit any form of retaliation against individuals who report a concern in good faith.
- Grievances are acknowledged within 48 hours and an initial assessment is completed within 7 days.
- Investigations are led by impartial individuals who were not involved in the original incident.
- The complainant has the right to appeal to senior management if they are unsatisfied with the resolution.
- All grievances, investigation steps, and outcomes are documented in a secure Grievance Register.
- We commit to fair remediation, which may include apologies, policy changes, or financial compensation.
- Anonymized grievance trends are reviewed by the Board annually to improve company culture and safety.

### Impact on SDGs



By,

Director (Opulence Impex Co. Ltd.)  
Date: 08<sup>th</sup> January 2026