

BY THE AUTHORITY OF THE COUNCIL

Divanaya Impex

IS A CERTIFIED MEMBER OF THE Responsible Jewellery Council

CERTIFIED MEMBER: 0000 1408 CERTIFICATION PERIOD: 08 OCTOBER 2018 - 08 OCTOBER 2021

Javia Alayfurd

DAVID BOUFFARD Chairman

ANDREW BONE

Executive Director Responsible Jewellery Council Responsible Jewellery Council

Divanaya Impex, Mumbai, India - Trading of Rough and Polished Diamonds; Divanaya Impex, Surat, India - Trading of Rough and Polished Diamonds.

The Responsible Jewellery Council is the trading name of the Council for Responsible Jewellery Practices Ltd. The Council for Responsible Jewellery Practices Ltd, 9 Whitehall, London, SW1A 2DD, UK. The Council for Responsible Jewellery Practices Ltd is registered in England and Wales with company number 05449042.

RJC CERTIFICATION INFORMATION CODE OF PRACTICES Summary



Certified member	Divanaya Impex
Membership forum	Diamond Trader and/or Cutter and Polisher
Certification number	0000 1408
Certification period	08 October 2018 – 08 October 2021
Audit date	31st July 2018
Audit type	First Certification
Previous certifications	0
Applicable standard	Code of Practices 2013
Accredited auditor	Intertek India Private Limited Lead Auditor: Ms. Namrata Mane
Certification scope	Divanaya Impex, Mumbai, India - Trading of Rough and Polished Diamonds; Divanaya Impex, Surat, India - Trading of Rough and Polished Diamonds.

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Applicable provisions	 General requirements: 1-4, except 3.2 Responsible supply chains and human rights: 5-12, except 6.2, 7.1, 9.3 & 11.3-4 Labour rights and working conditions: 13-20, except 17.3 & 19.3 Health, safety and environment: 21-25, except 21.10 Diamonds, gold and platinum group metals products: 26-28, except 28 Responsible mining sector: Not applicable
Provenance claims	To the best of our knowledge, implemented policies / procedures and written assurance from our suppliers, we state that diamonds herein invoiced have not originated from the MBADA and Marange resource of Zimbabwe and "Conflict zone of Democratic Republic of Congo region". The diamonds herein invoiced are not sourced from artisanal mines. The diamonds are in compliance with the applicable law and relevant WFDB Charter on disclosure of synthetic, treated natural and natural diamonds and OFAC guideline. All our diamonds are of natural origin, formed and grown under natural and geological processes and having been checked in a synthetic diamond testing machine except otherwise stated.
Auditor statement of conformance	 Based on the scope and findings of the audit, the sites visited and the available information provided by the member: The member has demonstrated a conformance level consistent with a 3 year certification period. The member has demonstrated a conformance level consistent with the transitional 1 year certification period for 1 year. The member is not eligible for RJC certification due to having four consecutive 1 year certification outcomes. Critical breaches have been identified and the RJC management team should initiate disciplinary procedures.
Mid-term review	 Based on the scope and findings of the certification audit/re-certification audit, the sites visited and the available information provided by the member: A. The member will not require a mid-term review because: No anticipated changes to the certification scope during the certification period. Member has < 25 full time equivalent personnel. Low risks of changes to current conformance levels and strong management controls.

	 B. The member will require a desktop mid-term review during the 3 year certification period to review progress on corrective action against non-conformances within 12-24 months, but a site visit is not required because: The actions can be verified remotely; or No risk to critical provisions; or There are parallel audit programs for equivalent recognised schemes (e.g. De Beers BPP, SA8000, OHSAS18001, ISO14001)
	 C. The member will require a mid-term review during the 3 year certification period that will include the need for site visits because: Known and anticipated changes to certification scope during the certification period Certification audit identified >2 minor NCs for critical provisions; or > 4 minor NCs in total New systems and controls for critical provisions that could not be tested at the certification audit Facilities with risk of non-conformances against critical provisions Other compelling reason presented by the lead auditor.
Confirmation	 The auditors confirm that: The information provided by the member is true and accurate to the best knowledge of the auditor(s) preparing this report. The findings are based on verified objective evidence relevant to the time period for the assessment, traceable and unambiguous. The scope of the assessment and the method used are sufficient to establish confidence that the findings are indicative of the performance of the member's defined certification scope. The auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
Auditor signature	On file

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Code of Practices certification

This certification is issued in accordance with RJC's Assessment Manual. The standard, supporting documentation, and assessment manual, can be downloaded at: <u>www.responsiblejewellery.com/rjc-certification/code-of-practices-certification13-2/</u>

This certificate can be authenticated by visiting: www.responsiblejewellery.com/members/certified-members/

If you have any questions about RJC certifications, please contact: certification@responsiblejewellery.com

The RJC aims to ensure the fair, timely and objective resolution of complaints relating to potential non-conformance with RJC certification or policies and procedures. The complaints mechanism and contact details can be accessed downloaded from: www.responsiblejewellery.com/contact-us/rjc-complaints-mechanism/

Disclaimer

No guarantee, warranty or representation is made by the RJC as to the accuracy or completeness of the information in this COP certificate, and no advice or information, whether oral or written, obtained from the RJC or elsewhere, will create any warranty, guarantee or representation in respect of this COP certificate. Compliance with RJC's standards and procedures is neither intended to, nor does it create, establish, or recognise any legally enforceable obligations or rights of, or against, the RJC and/or its members or signatories. To the fullest extent permitted by law, the RJC does not accept or assume responsibility to anyone for the audit process, for the member, for the entity, for the auditor, for COP certification, or for the decision to grant COP certification.