 Adoma Ltd.	Policy On custody company Assets	Documents No.	HR-PC-001
		Effective date	01/07/2025
		Revision	02
		Page	1/1



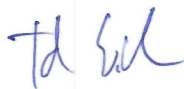
Adoma Co., Ltd. is the company engaging in manufacturing and exporting high-value jewelry Therefore, it is necessary to have a reliable internal control. Body check is one of the key internal control that help keep company assets safe as well as ensure the integrity and transparency of management and employees.


The company therefore establishes a policy on custody company assets subjecting on body check as below

1. All employees are responsible for protecting the company's asset from loss or damage.
2. All Employees must not steal or use company assets for personal benefit.
3. If the Company's asset is damaged or lost, the employee who supervises it need to be responsible
4. All employees must cooperate and consent to body-check and other requests related to the examinations.
5. Upon exit of the company, an employee must return all company's asset property and information back to the company. In addition, the employee must not disclosure company information and not seeking benefits from the property, information or status of being an ex-employee of the company without permission
6. If an employee is found to steal, use the company's assets for personal use or fail to comply with this policy, the employee will result in disciplinary action in accordance with the company's regulations and the company has the right to take legal action to the fullest extent
7. The checking is based On the principle of of human right , no physical offensive
8. The policy must be reviewed annually.

Announced on 01 July 2025

Maker record

Prepared by  HR Manager	Approved by  Managing Director	Approved by  Managing Director
Date 1/7/25	Date 1/7/25	Date 1/7/25

 Adoma Ltd.	Policy Employment Terms Management	Documents No.	HR-PC-009
		Effective date	01/07/2025
		Revision	01
		Page	1/1

We are committed to ensuring transparent and clear communication regarding wages, working hours, and other employment conditions to all employees. This is in adherence to applicable laws and this information will be provided prior to the commencement of employment.


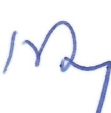
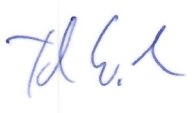
Policies


1. Written contracts outlining wages, working hours, and other employment conditions will be provided to all workers, ensuring compliance with applicable laws and collective bargaining agreements. For some of the information, the company may state in the company's work rules.
2. Contract will be written in Thai for easy communication. In addition, the Human Resources Department will provide additional explanations if requested by employee .
3. Contracts will be distributed before the commencement of work, and copies will be maintained within workers' employment files.
4. The company only employs full time employees and has not policy to hire temporary/season worker, apprenticeship, per piece employment.
5. In the event of changes to contract conditions, an amended contract will be delivered to employees, and a copy will be maintained in the worker's employment file.
6. Not keeping staffs' document (such as ID card) at the company. Keep only copied versions.
7. This policy must be reviewed annually.



Announced on 01 July 2025

Maker record

Prepared by  HR Manager	Approved by  Managing Director	Approved by  Managing Director
Date 1/7/2025	Date 1/7/25	Date 1/7/25

 Adoma Ltd.	Policy Overtime Work	Documents No.	HR-PC-010
		Effective date	01/07/2025
		Revision	01
		Page	1/1

The company has established a work arrangement that adheres primarily to the labor protection law to support a balanced work-life for employees. The company specifies a normal working hour not exceeding 48 hours per week, with no more than 6 working days in a week and at least one day off per week, which must not exceed 6 consecutive days.

The company may request employees to work beyond normal hours. Supervisors will inform employees in advance, and based on employees for voluntary. If so, the employees will sign up for overtime work request, which must be approved by their supervisors before it is undertaken. The company will allow overtime work as necessary, considering adequate rest for employees and ensuring that the rights to request overtime are correctly and uniformly exercised. Additionally, the refusal to perform overtime work must not result in any punishment from the company. Overtime work must not exceed 12 hours per week. Therefore, total working hour must not exceed 60 hours per week.

In addition, the company must have reliable record – keeping system to support reliable working hour/OT calculation



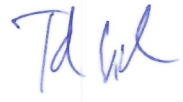
Guidelines:


1. Overtime work must be voluntary, without any coercion or threats forcing an employee to agree.
2. Overtime work should be as necessary, with consent from the employee each time, and should not exceed working 6 consecutive days.
3. Employees must always obtain approval from their direct supervisors before they are eligible for overtime work.
4. Employees must record their overtime hours daily.
5. The company pays overtime at no less than one and a half times the hourly wage rate of the employee.
6. If working on a holiday exceeds the normal working hours, the company pays triple the hourly wage rate for the hours worked by the employee on that day.
7. If overtime work continues from normal working hours for at least two hours, the company provides a break of at least twenty minutes before the employee starts overtime, unless 1. the condition of the work requires continuous operation, with the employee's consent or 2. in emergency situations.
8. The company has implemented a clearly, defined leave policy in accordance with applicable labor laws.
9. This policy must be reviewed annually.



Announced on 01 July 2025

Maker record

Prepared by  HR Manager	Approved by  Managing Director	Approved by  Managing Director
Date 1/7/2025	Date 1/7/25	Date 01/07/25

 Adoma Ltd.	Policy On Wages and Compensation	Documents No.	HR-PC-011
		Effective date	14/03/2024
		Revision	00
		Page	1/2

The company's wage and compensation policy applies to all employees. This policy ensures that the company can attract, develop, and retain high-performing and motivated employees in a competitive market with fair treatment. Employees will be offered appropriate and market-aligned wages and compensation, which is a key component of the compensation package. The result is that employees feel motivated to work, leading to sustainable outcomes and continuous company growth.

During performance evaluations, each employee and their supervisor will assess the past year's performance and set new goals. Decisions on salary adjustments will be based on the following performance evaluations:

Components of wages and compensation include:

- Salary
- Annual performance-based bonus
- Various benefits
- Severance pay (according to the Labor Protection Act)

Salary will be determined based on each employee's role and responsibilities, including professional experience, responsibilities, job complexity, and market conditions in the country.


Annual Performance-Based Bonus is an incentive and reward for employees who meet their set goals.

Benefits are based on company work rules.

Severance Pay in case of termination will be paid according to the Labor Protection Act.

Wage and Compensation Policy:

1. The Human Resources Manager is responsible for implementing this policy effectively.
2. Ensure accurate and transparent operations by:
 1. Establishing a reliable process for collecting data for wage and compensation calculations.
 2. Implementing a thorough review process for wage and compensation calculations.


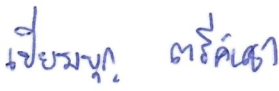

 Adoma Ltd.	Policy On Wages and Compensation	Documents No.	HR-PC-011
		Effective date	14/03/2024
		Revision	00
		Page	2/2


3. Allowing employees to raise concerns in case of calculation errors.
3. Payroll deductions should be processed through the payroll system:
 1. Only for items allowed by law.
 2. Providing clear explanations to employees.
 3. Ensuring employees' net income does not fall below the minimum wage.
4. Wages and compensation should be paid through a credible bank transfer to the employee's bank account and should not be offered in the form of company products or services, financial instruments, or other credit benefits.
5. Wage deductions are prohibited for:
 1. Disciplinary punishment.
 2. Procuring employee safety equipment.
 3. Procuring work-related equipment.
 4. Recruiting expenses.



Announced on 14 March 2024

Maker record

Prepared by  HR Manager	Approval by  Managing Director	Approval by  Managing Director
Date 14/3/2024	Date 14/3/2024	Date 14/3/2024

 Adoma Ltd.	Policy Grievance process & Management	Documents No.	HR-PC-012
		Effective date	01/07/2025
		Revision	01
		Page	1/1

Objective

This policy aims to ensure that the management of internal complaints within the company is transparent, effective, and facilitates the easy submission of complaints by employees. It seeks to protect confidentiality, safeguard the rights of all parties involved, provide fair resolution, and serve as a guideline for further development of personnel and organizational improvement.

Scope




This policy applies to all employees of the company and to employees of partners who work within the company.


Policy

1. The Human Resources Manager is responsible for implementing this policy effectively as expected.
2. Provide accessible and user-friendly channels for filing complaints.
3. Ensure a transparent complaint resolution process with representatives from all sectors involved.
4. Guarantee responses to complainants within a specified timeframe.
5. Ensure the protection of the welfare non-retaliation and confidentiality of complainants throughout the process.
6. This policy must be reviewed annually.



Maker record

Prepared by  HR Manager	Approved by  Managing Director	Approved by  Managing Director
Date 1/7/2025	Date 1/7/25	Date 1/7/25

 Adoma Ltd.	Policy Child Labour	Documents No.	HR-PC-014
		Effective date	19/02/2025
		Revision	01
		Page	1/1

Objective:

Our commitment to eradicating child labour, safeguards children's rights and well-being across all operations and supply chains. Adhering to international and local laws regarding employment age, this policy, supported by top management, ensures ethical business practices and contributes to abolishing child labour globally.

Scope:

1. All company operations.

Policies:

1.HR Manager Responsibility: The HR Manager oversees implementation and management across all operations and supply chains.

2.Employment Age Verification: Only individuals above the age of 18 are employed, utilizing a stringent age verification procedure. All related documents are maintained and stored properly.


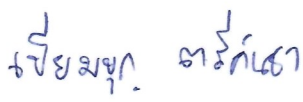
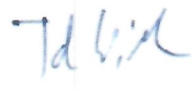
3.Risk Assessment: Assessments are conducted regularly to identify and mitigate risks related to child labour within operations and supply chains.


4.Remedy Plans: Procedures are in place to safeguard any child identified in contravention of this policy, ensuring their removal from labour and provision of appropriate support.

5.This policy must be reviewed annually



Maker record

Prepared by  HR Manager	Approved by  Managing Director	Approved by  Managing Director
Date 19/2/2025	Date 19/2/2025	Date 19/2/2025

 Adoma Ltd.	Policy Forced Labour and Human Trafficking	Documents No.	HR-PC-015
		Effective date	19/02/2025
		Revision	01
		Page	1/2

Objective

Our company is committed to prohibit any form of forced labour, involuntary work, and human trafficking in our operations and supply chain.


Scope

1. All company operations

Policies:

1. **HR Manager Responsibility:** HR Manager ensures the implementation, monitoring, and enforcement of this policy.
2. **No Forced Labour:** Strict prohibition of any form of forced or compulsory labour in our operations and supply chain.
3. **Fairness, proper employment and treatment:**
 - Ensuring employees' freedom of movement is not unduly restricted in the workplace both movements inside and out of the facility.
 - Not retaining original copies of an employee's personal documentation, such as identity cards.
 - Prohibiting requiring employee to pay any recruitment fees.
 - Not withholding any part of an employee's salary, benefits, or property to force them to continue working.
 - Ensuring employees can terminate their employment after notice of 30 days.
4. **Prevention of Human Trafficking:** Commitment to assessing the risks of human trafficking in operations and supply chain. Immediately take appropriate actions if any instances of human trafficking are identified.
5. **Regular Risk Assessments:** Conducting regular risk assessments to identify potential risks of forced labour or human trafficking both within the company and business partners.
6. **This policy must be reviewed annually**


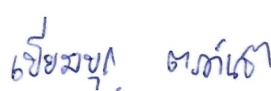

Remark Clues showing the potential risk are Abuse of vulnerability. Deception. Restriction of movement. Isolation. Physical and sexual violence. Intimidation and threats. Retention of identity documents. Withholding of wages. Debt bondage. Abusive working conditions. Excessive overtime.


 Adoma Ltd.	Policy Forced Labour and Human Trafficking	Documents No.	HR-PC-015
		Effective date	19/02/2025
		Revision	01
		Page	2/2



Announced on 19 February 2025

Maker record

Prepared by  HR Manager	Approved by  Managing Director	Approved by  Managing Director
Date 19/2/2025	Date 19/2/2025	Date 19/2/2025

 Adoma Ltd.	Policy Freedom of Association having welfare committee and Collective Bargaining	Documents No.	HR-PC-016
		Effective date	21/03/2024
		Revision	00
		Page	1/1

Our company is committed to upholding and promoting the rights of all workers to freely associate, form, and join welfare committees, and engage in collective bargaining. We believe in fostering an environment where workers can voice their concerns, negotiate terms of employment, and protect their interests without fear of retaliation are able to enhance the better working environment within the company.

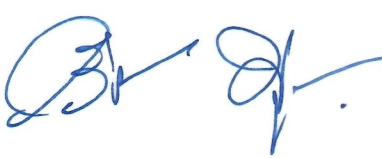
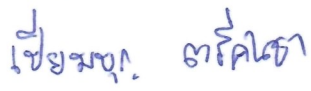
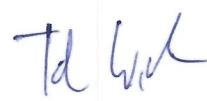
Policies:


- 1. Support for Welfare Committee:** We support the establishment and functioning of a welfare committee to facilitate the exchange of ideas and feedback from employees.
- 2. Recognition of Rights and Non-Discrimination:** We recognize and respect the rights of all workers to form and join welfare committees of their choice. Committee members will not face any form of discrimination.
- 3. Open Negotiation:** We are open to negotiations and will accept any welfare proposals put forth by the welfare committee, ensuring they bring the best benefit to the employees and align with the company's values and objectives.
- 4. Grievance Mechanism:** In the event of any unfair treatment related to Freedom of Association and Collective Bargaining, we have established a grievance mechanism that employees can use to raise and address their concerns.



Announced on 21 March 2024

Maker record

Prepared by  HR Manager	Approved by  Managing Director	Approved by  Managing Director
Date 21/3/2024	Date 21/3/2024	Date 21/3/2024

 Adoma Ltd.	Policy Non-violence harassment and Discrimination	Documents No.	HR-PC-017
		Effective date	19/02/2025
		Revision	01
		Page	1/1

Objective:

Our company is committed to fostering a workplace environment where all employees are treated with respect, equality and dignity. We strictly adhere to the principles of non-violence, harassment, and discrimination in all aspect including but not limit to sex, education, disability, ethnicity believes, and religion in all our business practices.

Scope:

1. All employee


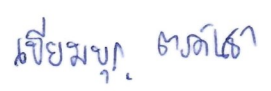
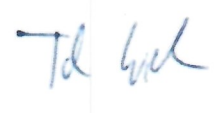
Policies:


1. **HR Manager Responsibility:** The HR Manager is tasked with ensuring compliance with our non-violence harassment and Discrimination policy across all company operations.
2. **Having mechanism to implement:** Documentation stating clearly the concerned issue. And training of all related personnel
3. **Risk Assessment:** Ongoing risk assessments are conducted to identify and address any potential areas of violence harassment and discrimination within the company and its operations.
4. **This policy must be reviewed annually**



Announced on 19 February 2025

Maker record

Prepared by  HR Manager	Approved by  Managing Director	Approved by  Managing Director
Date 19/2/2025	Date 19/2/2025	Date 19/2/2025

 Adoma Ltd.	Policy Responsible Jewellery Policy	Documents No.	HR-PC-018
		Effective date	19/02/2025
		Revision	01
		Page	1/1

Responsible Jewelry Policy


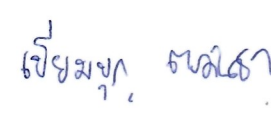
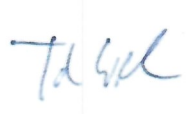
Adoma Ltd. offers full manufacturing services for high-quality jewelry. Located at 9 Phattanakan Road 11, Suan Luang, Bangkok 10250, we employ 170 personnel. Adoma is committed to enhancing our practices to be certified member of Responsible Jewellery Council (RJC) standards, by 2025.


We pledge to operate in accordance with the RJC Code of Practices, integrating ethical, human rights, social, and environmental considerations into our daily operations and business decisions. We are starting to explore to enhance our practice on carbon footprint and diversity. Our goal is to ensure responsible business practices throughout our supply chain, reflecting our commitment to sustainability and ethical integrity.



Announced on 19 February 2025

Maker record

Prepared by  HR Manager	Approved by  Managing Director	Approved by  Managing Director
Date 19/2/2025	Date 19/2/2025	Date 19/2/2025

 Adoma Ltd.	Policy Employee Health and Safety	Documents No.	SHE-PC-001
		Effective date	1/07/2025
		Revision	02
		Page	1/1

Objective:

Our company is committed to maintaining the highest standards of health and safety for all employees and other related individuals. This policy has been established to outline the guidelines for creating a suitable work environment, considering relevant laws, The standards of the jewelry industry, and the welfare of employees.

Scope:




1. All employees


Policy:

1. The Safety Officer (SO) is responsible for effectively implementing this policy to achieve its intended results.
2. The Company ensure that the workplace is safe, providing a appropriate work environment that supports safety for employees.
3. The Company provides facilities that promote good hygiene within the company premises, such as safe and clean drinking water, sanitation facilities, and clean toilets
4. A Health and Safety Committee (HSC) is established to enhance communication between management and employees regarding health and safety issues, with meetings held every month
5. Employees are provided with appropriate Personal protective equipment (PPE), with a proper Process in place for selecting suitable PPE.
6. Preparations are made for emergency situations (e.g., fire, flood, earthquake).
7. Recording and analysis of past incidents is conducted to identify causes and prevent recurrence
8. Sufficient first – aid facility is provided
9. Regular health and safety risk assessments are conducted
10. Adequate health and safety training is provided for employees.
11. This policy is reviewed every year.



Maker record

Prepared by:  HR Manager	Approved by:  Managing Director	Approved by:  Managing Director
Date 1/7/25	Date 1/7/25	Date 1/7/25

 Adoma Ltd.	Policy Environmental, Pollution and Water management	Doc. No.	SHE-PC-002
		Effective Date	01/07/2025
		Time of Adjustment	02
		Page	1/1

Objective:

Adoma Ltd. recognizes the environmental, Pollution and Water impact that affect employees, the community, and all relevant stakeholders. Accordingly, we have established a policy to control and minimize the impacts and optimize resource use.

Scope:

1. All company's operations, employees, surrounding community and environment.


Policy:

1. **The Safety Officer (SO)** is responsible for effectively implementing this policy to achieve its intended results.
2. **Compliance:** Commit to Strictly adhering to environmental laws, regulations, and standards related to waste management, pollution, and contaminants.
3. **Prevention and Mitigation:** Commit to preventing and taking actions to reduce environmental impacts and pollution in accordance with the provity of avoid, minimize, restore, offset
4. **Waste and pollution:** Support by the principle of the 4 Rs principle (Reduce, Reuse, Recover)
5. **Waste and pollution Reduction:** Commit to continually reducing waste and other pollution from business activities.
6. **Operational Efficiency and Awareness:** Commit to manage, Operate, improve, review, and develop environmental aspects and cultivate environmental awareness effectively.
7. **Regular environment, pollution, and waste management risk assessments must be conducted.**
8. **Recording and monitoring of waste and pollution is conducted** to identify causes, impact to environmental and prevent or reduce where possible
9. **Communication and Training:** Provide training internally and communicate externally to inform others of the company's commitment to environmental conservation.
10. **This policy must be reviewed annually**

Record of preparation

Prepared by  HR manager	Approved by  Managing Director	Approved by  Managing Director
Date 1/7/25	Date 1/7/25	Date 1/7/25




 Adoma Ltd.	Policy Hazardous Substance	Doc. No.	SHE-PC-003
		Effective Date	01/07/2025
		Time of Adjustment	01
		Page	1/2

Adoma Ltd. adheres to this policy, recognizing that chemical substances and hazardous materials are inevitably used in industry and daily life. Improper management of these substances can affect the safety of employees and the nearby community, as well as environmental quality.

With a commitment to managing chemical substances and hazardous materials used in company operations to the highest standards, Adoma Ltd. aims to prevent and minimize loss of life, property, and reduce environmental impact, both short-term and long-term.


To achieve these objectives, Adoma Ltd. has established the following policy guidelines:

1. Conduct comprehensive risk assessments of chemical substances and hazardous materials for all activities to establish standards for prevention and mitigation of potential impacts.
2. Avoid the use of chemical substances and hazardous materials, adhering to the hazard criteria specified by each country's laws and international standard.
3. Continuously communicate and raise awareness about the impacts of chemical substances and hazardous materials among employees and stakeholders.
4. Employees who handle chemical substances must receive training before commencing work.
5. Prepare and provide Safety Data Sheets (SDS) that specify chemical information in the company, posting notices at chemical storage locations and areas of use.
6. Maintain a registry of chemical substances used in the company and keep it up to date.
7. Designate a specific person responsible for managing chemical substances and hazardous materials, identified as a professional safety officer, who screens the use of chemicals and hazardous materials that may pose new risks, ensuring safe management according to SDS.
8. Consider using safer chemicals/alternative substances to those currently in use, if feasible.
9. A professional safety officer is responsible for promoting this policy and ensuring its practical implementation.
10. This policy must be reviewed annually

 Adoma Ltd.	Policy Hazardous Substance	Doc. No.	SHE-PC-003
		Effective Date	01/07/2025
		Time of Adjustment	01
		Page	2/2

Record of preparation

Prepared by:  HR Manager	Approved by:  Managing Director	 Approved by:  Managing Director
Date 1/7/25	Date 1/7/25	Date 1/7/25

 บริษัท อโดมา จำกัด	Natural Resource Utilization Policy	Doc. No	SHE-PC-005
		Effective Date	31/05/2567
		Time of Adjustment	00
		Page	1/1

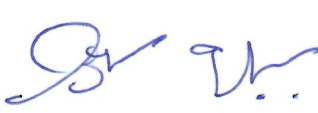

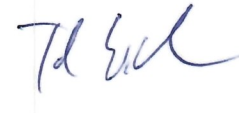
Adoma Co., Ltd. recognizes the environmental impacts that may affect employees, communities, and other stakeholders. Therefore, the Company has established this policy to **control and reduce environmental impacts** and to promote the **most efficient and optimal use of natural resources**. All employees are encouraged to cooperate and comply with the following:


1. The **Safety Officer (SO)** is responsible for driving the implementation of this policy to ensure it is effectively put into practice and achieves its intended purpose.
2. The Company shall **compile and analyze electricity and water usage data** to assess the efficiency of energy and water consumption.
3. The Company shall **evaluate the usage of other significant natural resources** to monitor efficiency and ensure maximum value and cost-effectiveness.
4. The Company shall **develop plans to reduce electricity, water, and other natural resource usage** every 1–2 years.
5. The Company shall **provide education and raise awareness** on natural resource utilization for employees, management, and other relevant stakeholders.



Announced on 31 May 2024

Maker record

Prepared by  HR Manager	Approved by  Managing Director	Approved by  Managing Director
Date 31/05/67	Date 31/05/67	Date 31/5/67

 Adoma Ltd.	Policy Anti Money Laundering and Counter-Terrorism Financing and Harmful Weapon	Documents No.	AC-PC-001
		Effective date	19/02/2025
		Revision	00
		Page	1/1

Objective

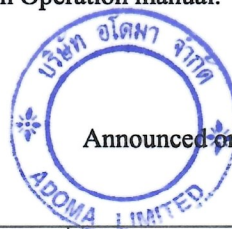
1. To identify and cease doing business with partners who pose risks of money laundering and terrorism, which bring financial risks and legal violations to the company.
2. To assist the government and international security agencies in effectively dealing with money launderers and terrorists.

Scope

1. All counterparty


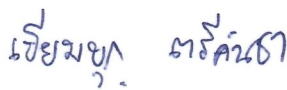
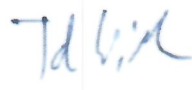
Policy


1. The company prioritizes the prevention and suppression of money laundering, counter-terrorism financing and wide spreading of weapon of mass destruction. The Accounting Manager are responsible for implementing this policy according to its inter.
2. Know your Customer (KYC) , Customer Due Diligence (CDD) and risk assessments must be conducted to all counterparties annually or when newly engaged or suspicious transaction encountered.
3. Money laundering and counter-terrorism financing risk assessment result must be reported to managing director annually.
4. Immediately terminate business relationships with high-risk partners and report to the Anti-Money Laundering Office (AMLO) if the risk is directly related to financial matters.
5. Provide relevant training to those involved in the prevention and suppression of money laundering and counter-terrorism financing.
6. Retain records related to the prevention and suppression of money laundering and counter-terrorism financing for at least 5-10 years as stated in Operation manual.
7. This policy must be reviewed annually.



Announced on 19 February 2025

Maker record

Prepared by  Accounting Manager	Approved by  Managing Director	Approved by  Managing Director
Date 20-2-68	Date 20/2/68	Date 20/2/68

 Adoma Ltd.	Policy of product disclosure and raw material and product quality control to ensure quality , ethics and transparency	Documents No.	SU-PC-001
		Effective date	19/02/2025
		Revision	00
		Page	1/2

Objective: To ensure:


1. Internal control for the company to ensure that information disclosed to customers is accurate and truthful.
2. Communication that leads to customer misunderstanding about the company's products are prohibited.

Scope:

All counterparties of the company

Policy:

1. The sustainable unit supervisor is responsible for implementing and promoting this policy in practice.
2. Disclosure of information must be factual, in accordance with Thai law and international standards, The company shall not make any untruthful, misleading or deceptive representation or make any material omission in the message conveying to customer or public.
3. The company has policy not to do provenance claim and does not specify the place of origin of diamonds and gemstones to prevent misinformation, Do not specify hard-to-verify qualities of products, such as claiming diamonds are 100% flawless or are Brilliant cut, or using terms like Pigeon blood for colored gemstones.
4. The company discloses information about its product following scope and channel listed in the procedure of product disclosure.
5. The company does business only with fine gold, natural diamonds, and gemstones, and has policy not to use synthetics composites reconstructed stone or simulant.
6. The company does not engage in business/products related to rough diamonds or conflict diamonds, nor with companies dealing with rough/conflict diamonds.
7. There must be a process to control the quality of the company's products to ensure that the disclosed information is correct, and not use counterfeit gold/diamonds (as listed in 5), rough diamonds, or conflict diamonds in its production processes. This includes adhering to operational procedures related to:
 - 7.1 Procurement
 - 7.2 Control and storage of precious metals, diamonds, gemstones, and finished products
 - 7.3 Quality control and traceability of products
8. When providing information about the quality of diamonds to customers, use a sample box to display and let customers choose the quality they require.

 Adoma Ltd.	Policy of product disclosure and raw material and product quality control to ensure quality , ethics and transparency	Documents No.	SU-PC-001
		Effective date	19/02/2025
		Revision	00
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9. Be a member and Adhere to the Kimberly Process certification scheme and the World Diamond Council (WDC) System of Warranties (SoW) as follows: 9.1 Conduct a self-assessment per the World Diamond Council regarding the Statement of Warranty. 9.2 Disclose the following information in the company's invoices:

- The diamonds herein invoiced are exclusively of natural origin and untreated based on personal knowledge and/or written guarantees provided by the supplier of these diamonds.
- The diamonds have been purchased from legitimate sources not involved in the funding of conflict, in compliance with United Nations Resolutions and corresponding national laws.
- The seller hereby guarantees that these diamonds are conflict-free and confirms adherence to the WDC SoW Guidelines.
- The diamonds are not of Russian Federation origin or exported from the Russian Federation.

10. Only purchase diamonds from suppliers who disclose information according to the statement of warranty criteria as specified in section 9.

11. The company take measure to ensure the product is safe to wear.

12. Conduct product disclosure and quality control risk assessments on production-line to ensure that product is in line with disclosed statement.




13. Ensure that all related staff are adequately trained in product disclosure and quality control.


14. This policy must be reviewed annually.



Announced on 19 February 2025

Maker record

Prepared by  Sustainability Unit Supervisor	Approved by  Managing Director	Approved by  Managing Director
Date 12/2/68	Date 19/2/68	Date 19/2/68

 Adoma Ltd.	Human Rights Policy	Document No.	SU-PC-002
		Effective Date	19/02/2025
		Revision	00
		Page	1/1

Objective:

Our company has commitment to respecting human rights across all operations of the company as well as of our business partners. We ensure that human rights are regarded comprehensively by having supervise it in multiple dimensions for and thorough coverage. In addition, we consistently communicate this to all relevant parties.

Scope:

1. All internal operation and business partners

Policies


1. **Uphold human rights in all cases:** The Company places great importance on upholding Human rights in all cases and in all business activities, and supports its business partners to give the same importance to human rights. The HR Manager and Sustainability unit supervisor are responsible for ensuring the effective implementation of this policy.
2. **Separate the oversight of human rights into various subtopics to ensure comprehensiveness.** : Establish policies and tools to facilitate the implementation of the policy, such as procedures, risk assessments, etc., for each key issue related to human rights, including
 - 2.1.) Non-discrimination and Harassment
 - 2.2.) Safe and Healthy Working Conditions
 - 2.3.) The Right to have a Welfare Committee and Collective Bargaining
 - 2.4.) No Child Labor
 - 2.5.) No Forced Labor
 - 2.6.) Grievance Mechanisms
 - 2.7.) Human right Due Diligence for business partner
3. **Legal Compliance:** Ensure compliance with all applicable human rights laws and regulations.
4. **Risk assessment** Human rights risk must be assessed and reported to managing director annually.
5. **Communication:** Transparently communicate our human rights policies, due diligence effort, and remedy action (if weakness is found) to the public and relevant stakeholders by proper channels to ensure effective accessibility.
6. **This policy must be reviewed annually**



Announced on 19 February 2025

Record of arrangement

Prepared by 1251 อธิพนธ์ HR Manager /Sustainability Unit supervisor	Approved by เจียสพงษ์ ธารรัตน์ Managing Director	Approved by Tid Lik Managing Director
Date 19/02/2025	Date 19/2/68	Date 19/2/68

 Adoma Ltd.	Policy Anti-Bribery and Corruption	Documents No.	SU-PC-003
		Effective date	19/02/2025
		Revision	00
		Page	1/1

Objective:

To prevent and reduce the risks of the company associated with corruption and bribery.

Scope:

1. All company's internal operations and all external partners



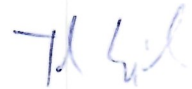
Policy:


1. **The Sustainability unit supervisor is responsible for** overseeing and implementing this policy in practice.
2. **The company strictly prohibits giving, receiving, or being involved with bribes,** fraud, corruption, gift and facilitation payment intended to influence within and outside the organization under all circumstances.
3. **Executives and employees of the company must refuse any bribes** or facilitation payment immediately when presented.
4. **Establish channels for reporting incidents** of bribes, facilitation payment, corruption, gift or other related activities.
5. **Protect complainants from retaliation** to ensure that they do not suffer due to their reporting of bribery and corrupt activities.
6. **If a complaint involving bribery, kickbacks, corruption, gift or similar is found** to be valid, the company will terminate relationships with external partners involved and proceed with disciplinary actions for internal employees as per company policy.
7. **Conduct regular risk assessments** for receiving/giving bribes, facilitation payment, corruption, gift and related activities.
8. **Provide relevant training** to all employee regarding bribery and corruption.
9. **Ensure that there are clear procedures** covering relevant practices such as communication, complaint handling, investigations, and complainant protection.
10. **This policy must be reviewed annually**

Announced on 19 February 2025



Maker record

Prepared by  Sustainability Unit Supervisor	Approved by  Managing Director	Approved by  Managing Director
Date 19/2/28	Date 19/2/28	Date 19/2/28

 Adoma Ltd.	Policy of External Grievance Management	Documents No.	SU-PC-004
		Effective date	19/02/2025
		Revision	00
		Page	1/1

Objective:

This policy aims to ensure that the management of external complaints is transparent, effective, and facilitates the easy submission of complaints by business partners, community and all relevant to the company. It seeks to protect confidentiality, safeguard the rights of all parties involved and provide fair resolution.

Scope:

This policy applies to all relevant parties as well as business partners and surrounding community.




Policy:


- Sustainability unit supervisor** is responsible for effectively implementing this policy, ensuring that it meets expected standards.
- Provide multiple accessible and user-friendly channels for filing complaints**, such as email, dedicated phone lines, and postal mail to accommodate various preferences and needs. The company also publishes these channels to ensure they are known to the public.
- Ensure timely responses to complainants** within a specified timeframe, aiming to address and resolve all issues promptly.
- Ensure the protection of the welfare and confidentiality** of complainants throughout the process, upholding the company's commitment to privacy and ethical standards.
- Ensure that there are clear procedures** covering relevant practices such as communication, complaint handling, investigations, recording, and complainant protection.
- Provide relevant training** to all employee regarding all relevant procedures and records.
- This policy must be reviewed annually**



Announced on 19 February 2025

Maker record

Prepared by  Sustainability unit supervisor	Approved by  Managing Director	Approved by  Managing Director
Date 19/2/68	Date 19/2/68	Date 19/2/68

 Adoma Ltd.	Policy Security and Proper Disciplinary Action	Documents No.	SU-PC-005
		Effective Date	19/02/2025
		Revision	00
		Page	1/1

Objective:

Our company is committed to ensuring a secure work environment and fair disciplinary processes without harsh treatment.

Scope:

1. All company operations and related stakeholders within company premise




Policy:


1. Human resource manager and Sustainability unit supervisor is responsible to this policy.
2. Security and Safety Measures :
 - Implement comprehensive security measures to protect employees, contractors, visitors, company properties both on-site and during external business activities.
 - Regularly assess and address security risks, prioritizing the protection of people
 - The degree of security force implementation must be proportionate to the cause. The advance cases must be handled by police or other related government agencies.
 - If the over-action disregarding human right from security personal is observed, disciplinary action and change of security provider will take place.
3. Conduct and Training of Security Personnel :
 - Regular training and monitoring to security personal is in need to ensure compliance with these standards.
 - security personal must be unarmed.
4. Disciplinary action to employees :
 - Develop and communicate clear disciplinary procedures, ensuring they are applied fairly and consistently across all levels of staff with decent detail of allegation and chance to response. The disciplinary actions must apply the step of gradual escalation without humiliating, intimidating or physical and financial penalty.
5. Risk Assessment: Ongoing risk assessments on security and proper disciplinary action are conducted regularly.
6. All related staff are trained following security and proper disciplinary action procedure without harassment nor discrimination.
7. This policy must be reviewed annually



Announced on 19 February 2025

Record of arrangement

Prepared by  Sustainability unit supervisor	Approved by  Managing Director	Approved by  Managing Director
Date 19/2/68	Date 19/2/68	Date 19/2/68

 Adoma Ltd.	Policy Due Diligence	Documents No.	SU-PC-006
		Effective date	19/02/2025
		Revision	00
		Page	1/1

Objective:

To effectively conduct due diligence on counter party from every angle whether supply chain, human rights, money-laundering, or counter-terrorism financing. Supply chain's due diligence will follow The Organization for Economic Co-operation and Development (OECD)'s guidance.

Scope:

1. All company's partners




Policy:


1. The Production Manager and Sustainability unit supervisor are responsible for implementation of this policy.
2. Communicate the supply chain policy to business partners allowing them to know Adoma's expectation.
3. Conduct risk assessments of suppliers regarding supply chain, human rights, anti-money laundering and terrorism financing.
4. Summarize the results of due diligence, prepare annual due diligence reports, and identify ways to further develop due diligence practices (if areas for improvement are identified).
5. Retain due diligence documentation for at least 5 years.
6. This policy must be reviewed annually.



Announced on 19 February 2025


Maker record

Prepared by  Production Manager / Sustainability Unit Supervisor	Approved by  Managing Director	Approved by  Managing Director
Date 19/2/2025	Date 19/2/2025	Date 19/2/2025

 Adoma Ltd.	Policy Supply Chain	Documents No.	SU-PC-007
		Effective date	19/02/2025
		Revision	00
		Page	1/2

Adoma Supply Chain Policy




1. **Adoma Ltd.** is a fine jewellery manufacturer based in Thailand, producing gold, diamond, and coloured gemstone jewellery for international markets. This policy confirms Adoma's commitment to respect human rights, avoid contributing to the financing of conflict, and comply with all relevant UN sanctions, resolutions, and laws.
2. Adoma is a certified member of the **Responsible Jewellery Council (RJC)**. As such, we commit to proving, through independent third-party verification, that we:
 - 2.1. a. Respect human rights in line with the **Universal Declaration of Human Rights** and **International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work**;
 - 2.2. b. Do not engage in or tolerate bribery, corruption, money laundering, or financing of terrorism;
 - 2.3. c. Support transparency in government payments and ensure that any security forces involved are rights-compatible;
 - 2.4. d. Do not provide direct or indirect support to illegal armed groups;
 - 2.5. e. Enable stakeholders to voice concerns regarding our supply chain;
 - 2.6. f. Are implementing the **OECD Due Diligence Guidance's Five-Step Framework** for responsible supply chains of minerals from conflict-affected and high-risk areas, including the **Gold Supplement** when applicable.
3. We also commit to using our influence to prevent abuses by others in our supply chain. We assess risks of non-compliance by our suppliers through our due diligence process and require adherence to this policy. Concerns related to materials from conflict-affected or high-risk areas (CAHRAs) can be raised via our grievance mechanism published on our website.
4. **Regarding serious human rights abuses** associated with the extraction, transport, or trade of minerals and gemstones:
We will neither tolerate nor profit from, contribute to, assist, or facilitate:
 - 4.1. a. Torture, cruel, inhuman, and degrading treatment;
 - 4.2. b. Forced or compulsory labour;
 - 4.3. c. The worst forms of child labour;
 - 4.4. d. Human rights violations and abuses;
 - 4.5. e. War crimes, crimes against humanity, or genocide.
5. We will **immediately suspend or discontinue engagement** with upstream suppliers if we identify a reasonable risk that they are committing or sourcing from parties committing the abuses listed in paragraph 4.
6. **Regarding direct or indirect support to non-state armed groups**, we will not tolerate any support including, but not limited to:
 - 6.1. a. Procuring gold, diamonds, or gemstones from, or making payments to, such groups;
 - 6.2. b. Supporting groups or affiliates who illegally control mine sites, transportation routes, trading hubs, or upstream actors in the supply chain, or who extort money or materials from them.

 Adoma Ltd.	Policy Supply Chain	Documents No.	SU-PC-007
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7. We will **immediately disengage** from suppliers reasonably suspected of providing direct or indirect support to such non-state armed groups.
8. **Regarding public or private security forces:**
We affirm that their role is to protect workers and facilities under the rule of law and in accordance with human rights. We will not support any security force committing abuses as outlined above.
9. **Regarding bribery and misrepresentation:**
We will not offer, promise, or give bribes, nor tolerate solicitation of bribes, to conceal the origin of materials or misrepresent taxes, fees, or royalties related to extraction and trade activities.
10. **Regarding money laundering:**
We commit to supporting efforts to prevent and eliminate money laundering risks linked to the sourcing, trade, transport, or export of precious metals or gemstones.
11. **This policy must be reviewed annually.**

Announced on 19 February 2025

Maker record

Prepared by  Production Manager/ Sustainability Unit Supervisor	Approved by  Managing Director	Approved by  Managing Director
Date 19/2/25	Date 19/2/25	Date 19/2/25