



### **Whistle-blowing and Grievance Policy**

Zarian Group (Zarian Co.,Ltd, Zarian Limited, Zarian Fabrikation GmbH) has been doing business in Thailand for more than 20 years with honesty and ethics as well as strictly complying with relevant laws, regulations, human rights, labour laws, and principles of good governance. In regard to responsibility to Social and Stakeholders, the company has set up a Whistle-blowing and Grievance policy with the following objectives

- To be a channel for directors, executives, employees and all stakeholders can complain or notice in case of fraud in various cases.
- To concerns about circumstances in the supply chain involving gold, silver, Platinum Group Metals (PGM), diamonds, coloured gemstones that the material and product are suspicious sourced from conflict-affected and high-risk areas.
- To be covered about circumstances in the supply chain involving the policy and statement of warranty in concern with the legitimate source of the mineral shall be publicly identified and verified and passed our due diligence management system for sustainability purpose.
- To concern about knowing or seeing actions that violate human rights practices and labor laws.
- To establish safe and confidential channels for Whistle-blowing and grievance.
- To provide a channel and protect persons who complain and report wrong doing, bribery, money-laundering, and corruption.
- To prevent or reduce the damage caused by wrong doing in terms of money and reputation of the company.
- To promote the image of the company and employees in terms of transparency business ethics.

#### **Person be in charge and ways to complain:**

Zarian Group has appointed Mr. Chollatis Suwannapiem, Factory Director, to be in charge of implementing and reviewing this policy. Concerns can be raised via the following channels:

1. Inform through our manager whom you trust.
2. Send email to Mr. Chollatis Suwannapiem , our Factory Director, at [chollatis@zarian.com](mailto:chollatis@zarian.com)
3. Send through our comment box that is provided at the entrance to the factory.
4. Send a letter to Mr. Chollatis Suwannapiem (Factory Director) or Mr. Haik Eghia Zarian (Chairman) at 89/172 Vibhavadi Rangsit Road Talad Bangkhen Subdistrict, Laksi District, Bangkok 10210

#### **Conditions of whistle-blowing and grievance:**

1. The details of whistle-blowing or grievance must be factual, clear, or sufficient to lead to investigation. When, who, where, and how damage is minimum requirement.
2. The whistle-blower or the complainant may choose not to reveal his/her name, company, address, and telephone number(s) if the disclosure will cause danger or damage. But if the person chooses to reveal himself/herself, the Company's investigation will proceed with

speed faster including the alleviation of the damage will be more convenient way and shorter time

3. The rights of the whistle-blower or the complainant will be protected whether he/she is an employee or an outsider.
4. The time required to process each grievance depends on the complexity of the case, document sufficiency, proofs received from the complainant, as well as documents, proofs, and explanations of the person complained against.
5. The person who receives the complaint and the person involved in the investigation must keep the filed information confidential. If necessary, they may disclose it taking into account the safety of and the damage to the complainant or any person who cooperates in the investigation, the information sources, or relevant persons.
6. If the complainant or the person who cooperates in the investigation thinks that he/she is unsafe or threatened, he/she may ask the company for appropriate protective measures, or the company may proactively provide protective measures if there is potential damage or danger.
7. The damaged person will be assisted by proper and just procedures.
8. Providers of false leads or complaints made to defame others are subject to disciplinary measures or punishment under applicable laws.

#### Procedure of Whistle-blowing and grievance:

1. Assess the eligibility of the complaint
2. Set up a committee
3. Appoint a person to respond
4. Find more possible and necessary information from all parties concerned
5. Present to a committee
6. Decide to take any actions
7. Inform the complainant for the decisions or outcomes (if know)
8. Keep records on complaints received and the internal process followed for at least five years

#### Protection of rights of employees, temporary employees, and outsourced persons:

The company will not unfairly treat directors, executives or employees, temporary employees, or outsourced persons, whether through changes in position, nature of work, or locations of work, suspension, threats, obstruction of work, termination of work, or any unfair act to these people because they:

- File complaints when coming across incidents or items suspected of wrongdoing, fraud, violations, or non-compliance with the law, or regulations.
- Provide whatever leads, information, cooperation, or assistance to management, public agencies, or regulators to ease examination or inspection when violation or non-compliance is suspected against the law.
- Reject corrupt practices even when business opportunities are at stake.

**ZARIAN GROUP**

Member of Responsible Jewellery Council



Zarian Group will maintain the confidentiality of provided leads and will keep confidential the names of their providers except where they have given their consent or where required by law.

Prince Haik Georg Eghiazarian  
Chairman  
11 May 2021