



BACKGROUND

Sovereign Metals Limited (SML) stands as a preeminent refinery, distinguished by well-structured manufacturing units and powered by progressive machinery and innovative technologies. Our facilities are engineered with a rigorous focus on safety, health, and environmental stewardship, ensuring a sustainable and responsible operational footprint. Visitors to our refinery encounter an organized, secure, and transparent atmosphere, reinforcing our commitment to precision and care in every process.

Our production standards merge contemporary technology with future trends. We consistently invest in upgrading our equipment, furnishings, and environmental controls to maintain industry leadership and drive purposeful innovation. With over 20 years of expertise in the precious metals sector, our team operates with total transparency. We embody the core value of Ethical Integrity, upholding the highest benchmarks of honesty and trustworthiness to ensure our actions resonate with our founding philosophy.

Our commitment is mirrored in the caliber of our products and the enduring trust of our partners. Endorsed across India, our precious metals reflect an unwavering dedication to excellence. We strive to serve our stakeholders with veracity and supremacy, living up to our brand promise: “Refining Today, Defining Tomorrow.”

Sovereign Metals Limited is committed to the ethical sourcing of precious metals in full compliance with OECD Guidelines and is a proud member of the Responsible Jewellery Council (RJC).

CONDUCTING BUSINESS WITH ETHICALLY, INTEGRITY, AND FAIRNESS

1. Conducting all business activities in an honest, ethical, professional, and accountable manner is the fundamental pillar of our corporate philosophy.
2. SML is dedicated to combating dishonesty and fraud in all transactions to enhance consumer trust and protect the reputation of the precious metals and jewelry industry.
3. We maintain the highest standards of financial integrity for the benefit of all stakeholders, ensuring that all records and reports are maintained according to national laws.
4. SML ensures strict compliance with generally accepted accounting policies and maintains a robust system of internal controls to safeguard assets and data.



5. We pursue corporate value enhancement through sound business practices that consider the interests of shareholders, customers, employees, suppliers, local communities, and business partners.
6. In all business decisions, employees are required to act on an informed basis, in good faith, and in the honest belief that their actions serve the best interests of the company.
7. SML utilizes monitoring programs to evaluate the effectiveness of these commitments, supporting all workers in maintaining these high standards.
8. The company communicates its business practices relevant to the Code of Practices (COP) to stakeholders at least annually, with reports approved by senior management.
9. Financial accounts of all transactions are maintained in accordance with national and international accounting standards.
10. SML undergoes an annual financial audit or review conducted by an independent, qualified accountant to ensure total fiscal transparency.

BUSINESS PARTNERS

A Business Partner is any entity with which SML has a direct relationship involving the purchase or sale of products or services. This includes contractors, agents, suppliers, intermediaries, and service providers such as security or recruitment agencies. Employees include both directly contracted staff and indirectly employed workers provided by third-party agencies.

SML identifies Significant Business Partners based on the volume, value, and strategic importance of the relationship. We utilize our best endeavors and professional influence to promote responsible business practices among these significant partners, ensuring the entire value chain aligns with our ethical standards.

HUMAN AND LABOUR RIGHTS

We respect all human rights in accordance with the Universal Declaration of Human Rights (UDHR), the UN Guiding Principles, and ILO Conventions.

- **Violence and Harassment:** All forms of workplace violence, harassment, corporal punishment, or coercion—whether direct or indirect—are strictly prohibited.
- **Child Labour:** SML will never engage in or support child labour, adhering strictly to ILO Conventions 138 and 182.



- **Forced Labour:** We prohibit all forms of forced, bonded, or involuntary prison labour, as well as human trafficking and deceptive recruitment.
- **Non-Discrimination:** We prohibit discrimination based on race, ethnicity, caste, religion, gender, disability, age, or any other personal characteristic.
- **Safe Environment:** We provide a healthy and secure working environment for all employees and on-site contractors.

BRIBERY, CORRUPTION, AND ANTI-MONEY LAUNDERING

SML prohibits bribery and corruption in all forms. This includes offering or receiving undue advantages involving government officials, political candidates, or private sector representatives.

Furthermore, we are committed to preventing Money Laundering and the Financing of Terrorism. We have implemented robust Know Your Counterparty (KYC) procedures to verify identities, monitor transactions for suspicious activity, and ensure no business is conducted with individuals or organizations named on international prohibited lists.

ENVIRONMENTAL MANAGEMENT

We manage our environmental impact through a structured Environmental Management System (EMS). This includes the responsible management of waste and emissions, the implementation of energy and water efficiency measures, and the sustainable use of natural resources to minimize our ecological footprint.

PRODUCT DISCLOSURE

SML complies with all trading standards and national regulations regarding precious metals. We provide Full Disclosure regarding the material characteristics of our products, including mass, weight, and fineness. We strictly prohibit any misrepresentation, misleading terminology, or deceptive advertising regarding the origin or treatment of diamonds and precious metals.

SUPPLY CHAIN POLICY: CONFLICT-AFFECTED AND HIGH-RISK AREAS

We are committed to a conflict-free supply chain. SML implements the OECD Five-Step Framework for risk-based due diligence. We will not tolerate, profit from, or facilitate:

- Torture or cruel, inhuman treatment.
- War crimes or violations of international humanitarian law.
- Direct or indirect support to non-state armed groups or illegal security forces.
- Fraudulent misrepresentation of the origin of gold, silver, or platinum.

If a reasonable risk is identified that a supplier is linked to such abuses, SML will immediately cease engagement with that party.



GRIEVANCE PROCEDURE

SML has established a formal mechanism for stakeholders to voice concerns regarding our supply chain or business practices.

- Contact: Grievances can be submitted to grievance@sovereignmetals.in.
- Process: Upon receipt, SML will investigate the claim, identify necessary actions, advise the claimant of the outcome, and maintain records of the grievance for at least five years.

Change Control

UPDATED BY	DATE OF UPDATE	KEY CHANGES MADE	VERSION
JAY RATHOD	17-04-2023	Supply Chain and Business Practice Policy	V.1
JAY RATHOD	25-04-2024	Re-draft	V.2
JAY RATHOD	25-04-2025	Refined version	V.3

For SOVEREIGN METALS LIMITED

VIRAL P. LODHIYA
Managing Director