 Adoma Ltd.	<p style="text-align: center;">Policy</p> <p style="text-align: center;">On custody company Assets</p>	Documents No.	HR-PC-001
		Effective date	15/03/2023
		Revision	00
		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.


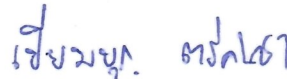

The company therefore establishes a policy on custody company assets subjecting on body check as below


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



Announced on 15 March 2023

Maker record

Prepared by  HR Manager	Approved by  Managing Director	Approved by  Managing Director
Date 15/3/2023	Date 15/3/2023	Date 15/3/2023

 Adoma Ltd.	Policy Employee Information Disclosure	Documents No.	HR-PC-008
		Effective date	19/02/2025
		Revision	01
		Page	1/1

Objective:

Adoma Ltd. has established a policy regarding the disclosure of employee information to external parties, adhering to the Personal Data Protection Act 2019. This law is designed to prevent violations of personal data privacy, including unauthorized collection and use without notification or consent from the employee.

Scope:


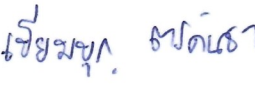
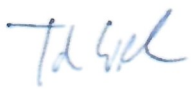
1. All employee's information disclosed to external parties


Policy:

1. **The HR Manager** is tasked with ensuring compliance with our employee information disclosure policy across all company operations.
2. **Disclosure of Personal Data to External Parties:** The Company may disclose the staffs' personal data to others only with employee consent or permission by law. The company may consider disclose the data based on necessity.
3. **Legal Disclosure of Personal Data:** In cases government agencies or courts request the data, the company will disclose it based on necessity and only with written requests.
4. **Duration of Personal Data Storage:** The company will retain staffs' personal data as long as they are employed by the company or as long as necessary. The company will delete, destroy, or anonymize the data when it is no longer necessary.
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 Employment Terms Management	Documents No.	HR-PC-009
		Effective date	12/03/2024
		Revision	00
		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.

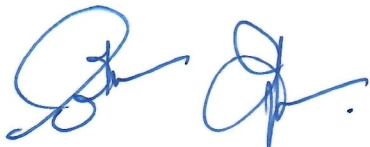
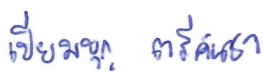

Policies


- 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.
- Contract will be written in Thai for easy communication. In addition, the Human Resources Department will provide additional explanations if requested by employee .
- Contracts will be distributed before the commencement of work, and copies will be maintained within workers' employment files.
- 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
- Not keeping staffs' document (such as ID card) at the company. Keep only copied versions.



Announced on 12 March 2024

Maker record

Prepared by  HR Manager	Approved by  Managing Director	Approved by  Managing Director
Date 12/3/2024	Date 12/3/2024	Date 12/3/2024

 Adoma Ltd.	Policy Overtime Work	Documents No.	HR-PC-010
		Effective date	13/03/2024
		Revision	00
		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.


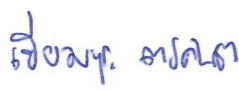

Guidelines:


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.



Announced on 13 March 2024

Maker record

Prepared by  HR Manager	Approved by  Managing Director	Approved by  Managing Director
Date 13/3/2024	Date 13/3/2024	Date 13/3/2024

 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.


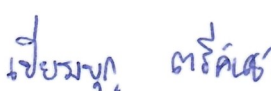

 Adoma Ltd.	Policy On Wages and Compensation	Documents No.	HR-PC-011
		Effective date	14/03/2024
		Revision	00
		Page	2/2


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 of Handling Internal Complaints in the Company (Grievance Management)	Documents No.	HR-PC-012
		Effective date	15/03/2024
		Revision	00
		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.


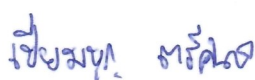

Policy


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 and confidentiality of complainants throughout the process.



Announced on 15/03/2024

Maker record

Prepared by  HR Manager	Approved by  Managing Director	Approved by  Managing Director
Date 15/3/2024	Date 15/3/2024	Date 15/3/2024

 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.


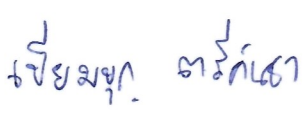
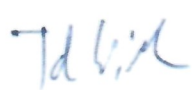
3.Risk Assessment: Assessments are conducted regularly to identify and mitigate risks related to child labour within operations and supply chains.


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**


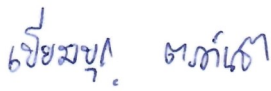

Remark Clues showing the potential risk are Abuse of vulnerability. Deception. Restriction of movement. Isolation. Physical and sexual violence. Intimidation and threats. Retention of identity documents. Withholding of wages. Debt bondage. Abusive working conditions. Excessive overtime.


 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.

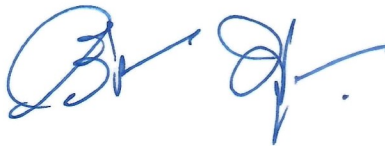
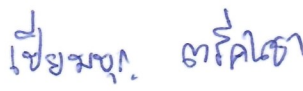
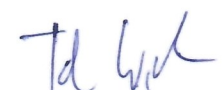
Policies:


- 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


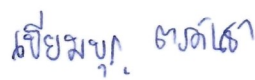

Policies:


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


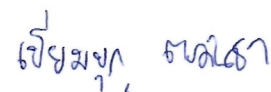

Adoma Ltd. offers full manufacturing services for high-quality jewelry. Located at 9 Phattanakan Road 11, Suan Luang, Bangkok 10250, we employ 170 personnel. Adoma is committed to enhancing our practices to be certified member of Responsible Jewellery Council (RJC) standards, by 2025.


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	19/02/2025
		Revision	01
		Page	1/1

Objective:

Our company is committed to maintaining the highest standards of health and safety for all employees and 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 employee

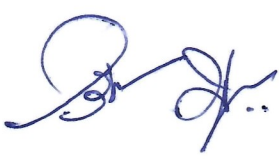
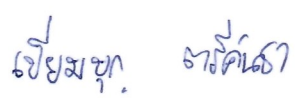

Policy:


1. **The Safety Officer (SO)** is responsible for effectively implementing this policy to achieve its intended results.
2. **The company ensures 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, accidents from work).
7. **Recording and analysis of past incidents is conducted** to identify causes and prevent recurrence.
8. **No cobalt-containing substances is in use in polishing process.**
9. **Regular health and safety risk assessments are conducted.**
10. **Adequate health and safety training is provided for employees.**



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 Environmental, pollution and waste management	Documents No.	SHE-PC-002
		Effective date	19/02/2025
		Revision	01
		Page	1/2

Objective:


Adoma Ltd. recognizes the environmental, pollution and waste 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.

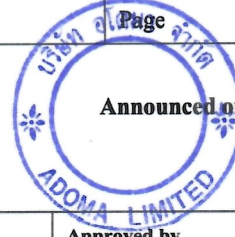
Scope:

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

Policy:

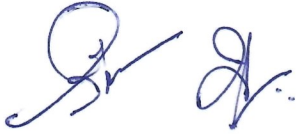
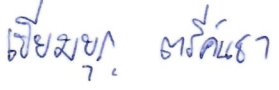

1. **The Safety Officer (SO)** is responsible for effectively implementing this policy to achieve its intended results.
2. **Compliance:** Commit to strictly adhering to environmental laws, regulations, and standards related to waste management, pollution, and contaminants.
3. **Protection and Mitigation:**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


 Adoma Ltd.	Policy Environmental, pollution and waste management	Documents No.	SHE-PC-002
		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


	Policy Hazardous Substance	Doc. No.	SHE-PC-003
		Effective Date	05/03/2567
		Time of Adjustment	00
		Page	1/2

Adoma Ltd. adheres to this policy, recognizing that chemical substances and hazardous materials are inevitably used in the 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 approves 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.

 บริษัท อโดมา จำกัด	Policy Hazardous Substance	Doc. No.	SHE-PC-003
		Effective Date	05/03/2567
		Time of Adjustment	00
		Page	2/2

Record of preparation

Prepared by:  HR Manager	Approved by:  Managing Director	Approved by:  Managing Director
วันที่ 5/3/2567	วันที่ 5/3/2567	วันที่ 5/3/2567



 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

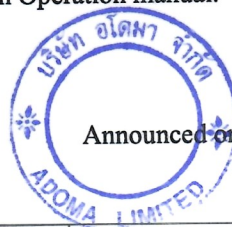
1. To identify and cease doing business with partners who pose risks of money laundering and terrorism, which bring financial risks and legal violations to the company.
2. To assist the government and international security agencies in effectively dealing with money launderers and terrorists.

Scope

1. All counterparty


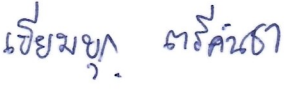
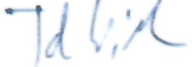
Policy


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 26-2-68	Date 20/2/68	Date 20/2/68

 Adoma Ltd.	Policy of product disclosure and quality control	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, aimed at providing understanding to customers and not as advertising or endorsement.
3. **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, rough diamonds, or conflict diamonds in its production processes. This includes adhering to operational procedures related to:
 - 3.1. Procurement
 - 3.2. Control and storage of precious metals, diamonds, gemstones, and finished products
 - 3.3. Quality control and traceability of products
4. **Information about products must only be disclosed through designated channels** as outlined in the operational procedures.
5. **The company does business only with real gold, diamonds, and gemstones**, and ensures the authenticity of gold, diamonds, and gemstones as per procurement procedures.
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. **The company does not specify the place of origin of diamonds and gemstones to prevent misinformation**, however, the company maintains accurate standards of weight and quality of diamonds and gemstones.
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.


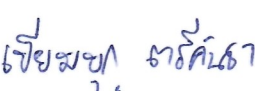

 Adoma Ltd.	Policy of product disclosure and quality control	Documents No.	SU-PC-001
		Effective date	19/02/2025
		Revision	00
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9. **Do not specify hard-to-verify qualities of products**, such as claiming diamonds are 100% flawless or are Brilliant cut, or using terms like Pigeon blood for colored gemstones.
10. **Adhere to the Kimberly Process certification scheme and the World Diamond Council (WDC) System of Warranties (SoW) as follows:** 10.1 Conduct a self-assessment per the World Diamond Council regarding the Statement of Warranty. 10.2 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.
11. **Only purchase diamonds from suppliers who disclose information** according to the statement of warranty criteria as specified in section 10.
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 19/02/2025	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 1255 อธิพนธ์ HR Manager /Sustainability Unit supervisor	Approved by เจษฎาภรณ์ อธิพนธ์ 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
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Objective:

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

Scope:


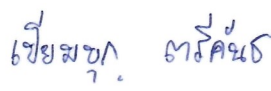

1. All company's internal operations and all external partners


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, 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, 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, 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, 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**



Maker record

Prepared by  Sustainability Unit Supervisor	Approved by  Managing Director	Approved by  Managing Director
Date 19/02/2025	Date 19/2/68	Date 19/2/68

 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.


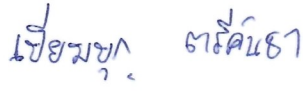
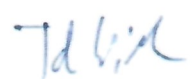
Policy:


1. **Sustainability unit supervisor** is responsible for effectively implementing this policy, ensuring that it meets expected standards.
2. **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.
3. **Ensure timely responses to complainants** within a specified timeframe, aiming to address and resolve all issues promptly.
4. **Ensure the protection of the welfare and confidentiality** of complainants throughout the process, upholding the company's commitment to privacy and ethical standards.
5. **Ensure that there are clear procedures** covering relevant practices such as communication, complaint handling, investigations, recording, and complainant protection.
6. **Provide relevant training** to all employee regarding all relevant procedures and records.
7. **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 19/02/2025	Date 19/2/68	Date 19/2/68

	<p style="text-align: center;">Policy</p> <p style="text-align: center;">Security and Proper Disciplinary Action</p>	Documents No.	SU-PC-005
		Effective Date	19/02/2025
		Revision	00
		Page	1/2

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. **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 strictness must be moderate. 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

 Adoma Ltd.	Policy Security and Proper Disciplinary Action	Documents No.	SU-PC-005
		Effective Date	19/02/2025
		Revision	00
		Page	2/2

Record of arrangement

Prepared by นาย ดิเรก ส.	Approved by เจียมนะ ศรีคำ	Approved by Td Lk
Sustainability unit supervisor	Managing Director	Managing Director
Date 19/02/2025	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

Objective:

Adoma is a Thai-German joint venture jewelry manufacturing company established in 1988. This policy reaffirms the company's commitment to respecting human rights, avoiding involvement in non-transparent financial transactions, and cooperating with the United Nations on various aspects related to sustainability. The company aims to extend this commitment to its suppliers to enhance the quality and transparency of the gemstone supply chain.

Scope:

1. Raw material procurement related to precious metal, diamonds, and coloured gemstone.
2. All business partners related to precious metal, diamonds, and coloured gemstone.

Policy:

1. **The Production Manager and Sustainability unit supervisor** are responsible for implementation of this policy.
2. **Adoma is committed to becoming a member of the Responsible Jewellery Council (RJC)** and aims to obtain a quality certification by 2025. Therefore, we plan to undergo an independent audit to confirm that the company:
 - a. Values and respects human rights according to the Universal Declaration of Human Rights and the International Labour Organization's fundamental rights at work.
 - b. Does not support any form of bribery, corruption, money laundering, or financing of terrorist groups.
 - c. Supports government policies on financial transparency.
 - d. Considers the safety of employees and property, and does not use violence against employees in any case.
 - e. Does not directly or indirectly support illegal armed groups.
 - f. Promotes stakeholder engagement in supply chain matters.
 - g. Implements the 5-step practice for responsible mineral supply chains in conflict-affected and high-risk areas, as outlined by the Organization for Economic Co-operation and Development (OECD).
3. **The company will regularly assess supplier risks** based on internal raw material screening, customer complaints about raw material quality, and supplier self-assessment forms to enhance the quality and transparency of the gemstone supply chain. This is to screen and mitigate risks from inappropriate business practices of suppliers in the following areas:
 - 3.1. Serious human rights violations. The company will not accept, promote, support, facilitate, or profit from suppliers involved in:
 - 3.1.1 Torture, cruelty, inhumanity, or degradation.
 - 3.1.2 Forced labor.
 - 3.1.3 Child labor.
 - 3.1.4 Human rights abuses.
 - 3.1.5 Supporting war criminals, violating international humanitarian law, crimes against humanity, and genocide.




 Adoma Ltd.	Policy Supply Chain	Documents No.	SU-PC-007
		Effective date	19/02/2025
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- 3.2. Support for non-state recognized terrorist groups.
- 3.3. Use of force for employee coercion. Suppliers may have security systems or personnel, but their purpose must be to ensure the safety of employees, workplaces, machinery, equipment, and property within legal limits, and not for coercion, intimidation, or actions affecting employee welfare.
- 3.4. Involvement in bribery. Suppliers must not offer, promise, or demand bribes to the company or other business partners.
- 3.5. Misrepresentation of the origin of precious metals, diamonds, and colored stones. Suppliers must not misrepresent, falsify, conceal, or avoid taxes, fees, royalties for mining, trading, managing, transporting, or exporting precious metals, diamonds, and colored stones.
- 3.6. Money laundering. Suppliers must not be involved in money laundering and must support efforts to eliminate it.
- 3.7. Business operations as small-scale mining or informal gold recyclers, as these are considered high-risk for various violations and inadequate internal controls.
4. **The company has a policy not to conduct business with suppliers that fall under these seven categories** and will immediately terminate business if current suppliers are found to be in violation.
5. 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