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BUSINESS PARTNERS / KYC

BUSINESS PARTNERS

IGCJD will use its best endeavors and correspond with its ability to influence promoting responsible business practices among its significant business partners.

KNOW YOUR CUSTOMER/VENDOR (KYC): IDENTIFICATION AND VERIFICATION

IGCJD will identify and verify the identity of all their customers, suppliers, and business partners using reliable, independent source documents, data, and information.

All customers, suppliers, and business partners are required to provide proof of incorporation or similar evidence of the legal status of the legal person or arrangement, as well as information concerning the business partner's name, the names of trustees, legal form, address, directors, and provisions regulating the power to bind the legal person or arrangement.

Any person purporting to act on behalf of the customer, supplier, or other business partner must validate that he/she is authorized to do so, and the identity of the person must be provided.

All new customers and suppliers must complete the Customer/Supplier Verification Form.

IGCJD must take reasonable measures to identify and verify the identity of the Ultimate Beneficial Owner (UBO) of any customer, supplier, or other business partner, including forming an understanding of the ownership and control structure, such that IGCJD is satisfied that it knows who the UBO is. The type of measures needed to satisfactorily perform this function would require the following actions:

- identification of the UBOs: the natural persons who, whether acting alone or together or through one or more juridical persons, exercise control through ownership or voting rights, or who ultimately have a controlling ownership interest.
- if unable to identify the UBO, identification of the natural persons who comprise the Senior Management of the legal person or arrangement.
- after identification of the UBO or Senior Management: verification of the data through the Bureau Van Dijk global KYC Database, which contains 250 million companies worldwide with information about directors, shareholders, UBOs, FATF countries, sanction lists, and individuals worldwide, and to which IGC has access. The database comprises two sets of data:

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- Orbis: Company Verification Database
- WorldCompliance: Individuals Verification Database

Where the customer, supplier, or the owner of the controlling interest is a *public listed company* that is subject to regulatory disclosure requirements, it is not necessary to seek identification and verification of the identity of any shareholder of that company.

Additional documentation is required:

- AML declaration completed and signed;
- RJC COP compliance declaration completed and signed;
- U.S. Patriot Act and BSA Compliance Form completed and signed.

IGCJD must conduct ongoing due diligence on their business relationships and scrutinize all transactions undertaken throughout the course of that relationship. Any customer, supplier, or other business partner with whom no transactions have been conducted over the past 12 months, and with whom a new transaction is presented, will automatically be subject to a fresh and integral KYC identification and verification procedure.

IGCJD bears the ultimate responsibility for accepting a business partner and conducting a transaction. Therefore, strict and comprehensive due diligence is substantial to protect IGCJD and its business.

RISK ASSESSMENT, MANAGEMENT, AND MITIGATION

IGCJD must identify, assess, and prioritize potential risk and undertake the required actions to mitigate, monitor, minimize, and control the probability of money laundering activity. The Compliance Officer must intensify his/her investigation measures to the degree of perceived risk in situations that seem to bear an increased chance of money laundering or terrorism financing.

RESPONSIBILITY

IGCJD appoints an internal Compliance Officer who is responsible for implementing the KYC policy and procedure and updating the information on a regular basis.

IGCJD works together with an external Compliance Officer of IGC Group NV, who manages the customer/vendor inquiries and database.

The external Compliance Officer reviews the management system on a regular basis, at least once per year, and discloses in a yearly report to the IGCJD BOD if any red flags or concerns were detected.

The external Compliance Officer verifies that IGCJD's main suppliers have carried out due diligence and annually reviews this information.

PATRIOT ACT FORM

Company Name: _____

Address: _____ Suite/Room # _____

City: _____ State: _____ Zip Code: _____

Phone Number (including area code): _____

Fax Number (including area code): _____

Company Website: _____

Email Address: _____

Tax Identification Number or Social Security: _____

Year Company Established: _____

Name of Owners: _____

Bank Name: _____

Bank Address: _____ City, State, Zip: _____

Number of Employees _____

Does your company implement an anti-money laundering program? Yes / No
circle one

I confirm that the above information is correct: _____
print name

Signed _____ Date _____

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QUESTIONNAIRE

Name of Company	
Type of Company (LTD, sole proprietorship, LLC, ...)	
Nature of Business (retailer / wholesaler jewelry manufacturer / ...)	
Year of Foundation	
Official company registration number in your country	
Registered office address	
Operational address (if different)	
Telephone number, e-mail address (and website)	
Membership of professional organization(s) (if applicable)	
Name and E-mail address of the person(s) who will be purchasing from or selling to IGC JD on behalf of your company	

<p>List of the names of the board of directors¹ (if possible, also provide dates of birth, places of birth and addresses)</p>	
<p>List of the names of the UBO ultimate beneficial owners² of your company (if possible, also provide dates of birth, places of birth and addresses)</p>	<p><i>If there is no person who has more than 25% of the shares nor a person who has control by other means, fill in the natural person that is a member of the management of the company (e.g. Principal Executive Officer, Managing Director or CEO)</i></p>
<p>Politically exposed persons: is one of the company members related to a politically exposed person or is one of the company members a politically exposed person?³</p>	<p>Mark the box if non-applicable: <input type="checkbox"/></p> <p>Please clarify title and function:</p> <p>Please clarify the source of your funds for buying IGC JD jewelry and diamonds:</p>
<p>Does your company implement an anti-money laundering program?</p>	<p>Yes <input type="checkbox"/></p>

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1. UNDERTAKING

Please tick the check boxes below confirming the required attachments. You may add a watermark to these documents (e.g. "For IGC JD Only") as long as all information remains easy to read.

A recent copy of the bylaws, certificate of incorporation, extract from the business register or other **legal documents** proving the company's existence as officially published in the country of establishment. Preferably, this document **mentions all current directors** of the company and is written in English.

A copy of the driver's license of the company's **Managing Director, Principal Executive or CEO**

A copy of the driver's license of the company's **representative(s)** a.k.a. the person(s) who will be purchasing from or selling to IGC JD on behalf of your company.

Our company will comply with national and -where appropriate- international legislation, regulations, and conventions with respect to money laundering, terrorism financing, bribery, facilitation, corruption, smuggling, embezzlement, fraud, racketeering, transfer pricing and tax evasion. Our company pursues the RJC CoP undertaking attached hereto and agrees to the terms and conditions of IGC JD.

We hereby confirm that all the information contained in the questionnaire and associated supplementary documents is true and correct and we undertake to inform IGC JD of any changes therein, immediately.

Place:

Date: (DD/MM/YYYY)

Signature: _____

By,

(Printed

Name)

who warrants to be duly authorized hereto by

(Compa

ny Name).

2. RJC CoP UNDERTAKING

IGCJD is an international jewelry and diamond company and a reputable member of the jewelry & diamond industry. IGCJD has been a **Certified Member of the Responsible Jewelry Council (RJC)** since 2012. IGCJD fully complies with the **2019 RJC Code of Practices (CoP)**. This code and principles are based on applicable national and international legislation, conventions, and industry practices.

We are convinced that you are similarly committed to the ideals of the CoP in the industry. As an RJC Certified Member, we are required to obtain from you an undertaking that you will assist us, to the best of your ability, in our implementation of the CoP and that you undertaketo conduct your business operations in accordance with these codes and principles.

If you are a supplier to IGCJD, we expect from you that you have carried out due diligence based on an approach that is aligned with the OECD guidance.

In order to assist you in this endeavor, you will find the requirements of **RJC CoP** at:
<https://www.responsiblejewellery.com/wp-content/uploads/RJC-COP-2019-V1-1-Standards-2.pdf>

Please feel free to contact us for any additional information on CoP requirements.

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