

TO WHOM IT MAY CONCERN

GEMELODYS, INC. (“GEMELODY”)

RESPONSIBLE BUSINESS POLICY

GEMELODY is proud of our tradition of conducting our business in accordance with the highest ethical standards and in compliance with the laws of the United States and of the countries in which we produce, buy and sell our products.

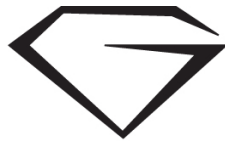
GEMELODY is committed to legal compliance and ethical business practices in all operations and will only do business with manufacturers and suppliers who share that commitment.

GEMELODY actively seeks to engage as its vendors and suppliers, companies which offer their workers safe and healthy workplaces.

GEMELODY will not tolerate exploitative or abusive conditions once known. This GEMELODY Vendor Code of Conduct (hereinafter the “Code of Conduct”) defines our minimum expectations. No Code can be all inclusive, but we expect our vendors and suppliers to act reasonably in all respects and to ensure that no abusive, exploitative or illegal conditions exist at their workplaces, or those of their manufacturers, subcontractors and suppliers.

GEMELODY requires its vendors and suppliers to extend principles of fair and honest dealing to all others with whom they do business, including employees, manufacturers, subcontractors and other third parties. We also require our vendors and suppliers to ensure and to certify to us that no abusive, exploitative or illegal conditions exist at their workplaces and those of their manufacturers, subcontractors and suppliers.

GEMELODY will only do business with vendors and suppliers who obey the laws of the country in



which they operate and the principles expressed in this Code of Conduct.

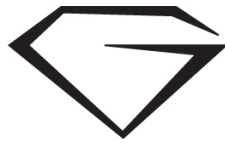
GEMELODY will only do business with vendors and suppliers who have certified to us, and whose manufacturers, subcontractors and suppliers with whom they do business have certified to them, that their respective business practices are lawful, ethical and in compliance with the principles set forth in this Code of Conduct and who have agreed to be subjected to the scrutiny of the GEMELODY'S Supplier Monitoring Program under which they will be inspected and evaluated to ensure their compliance with this Code of Conduct.

Forced Labor: GEMELODY will not purchase products or components thereof from any vendor, manufacturer, subcontractor or supplier that uses forced labor, prison labor, indentured labor or exploited bonded labor, or permits any of its vendors, manufacturers, subcontractors or suppliers to do so. Forced Labor should be considered to include any work or service, which is extracted from any person under the threat of penalty for its non-performance and for which the worker does not offer himself or herself voluntarily.

Child Labor: GEMELODY will not purchase products or components thereof manufactured by persons younger than 15 years of age or younger than the age of completing compulsory education in the country of manufacture where such age is higher than 15.

Harassment or Abuse: GEMELODY manufacturers, subcontractors and suppliers must treat their employees with respect and dignity. No employee shall be subject to physical, sexual or psychological harassment or abuse.

Nondiscrimination: GEMELODY manufacturers, subcontractors and suppliers shall not subject any person to discrimination in employment, including hiring, salary, benefits, advancement, discipline, termination or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, or social or ethnic origin. GEMELODY'S manufacturers, subcontractors and suppliers shall ensure that full maternity and paternity rights are respected according to the applicable laws.



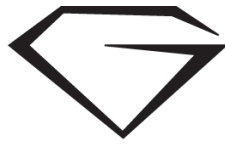
Hazardous Substances: GEMELODY manufacturers, subcontractors and suppliers shall not manufacture, trade, and/or use chemicals and hazardous substances subject to international bans of phase-outs due to their high toxicity to living organisms, environmental persistence, and potential for bioaccumulation or potential for depletion of the ozone layer. GEMELODY'S manufacturers, subcontractors and suppliers shall employ alternatives to other hazardous substances used in production processes wherever technically and economically viable. Where the use of hazardous substances cannot be avoided, manufacturers, subcontractors and suppliers shall employ appropriate measures to minimize the risk of employee contact. They shall also establish clear lines of responsibility for safety, security, release prevention training and emergency response in relation to hazardous substances used in operations.

Health and Safety: GEMELODY manufacturers, subcontractors and suppliers shall provide a safe and healthy working environment to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of employer facilities. GEMELODY'S manufacturers, subcontractors and suppliers must fully comply with all applicable workplace conditions, safety and environmental laws.

Housing: GEMELODY manufacturers, subcontractors and suppliers who provide residential facilities for workers are expected to maintain such housing to a reasonable standard of safety, repair and hygiene; and such housing will also provide sufficient and proper sanitation facilities, potable water and access to a power supply in addition to complying with local laws and regulations.

Freedom of Association: GEMELODY manufacturers, subcontractors and suppliers shall recognize and respect the right of employees to freely associate in accordance with the laws of the countries in which they are employed.

Wages and Benefits: GEMELODY'S manufacturers, subcontractors and suppliers recognize that wages are essential to meeting employees' basic needs. GEMELODY'S manufacturers, subcontractors and suppliers shall pay employees at least the minimum wage required by local law regardless of whether they pay by the piece or by the hour and shall provide legally



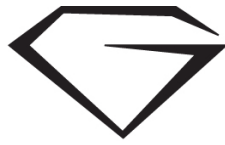
mandated benefits. GEMELODY'S manufacturers, subcontractors and suppliers shall (i) make payment to employees on a regular and predetermined bases; (ii) accompany all payments by a wage slip that clearly details wage rates, benefits and deductions where application; (iii) not force employees to buy provisions from a employer owned business; (iv) and not make deductions from employee's wages without due process.

Work Hours: GEMELODY'S manufacturers, subcontractors and suppliers shall not require their employees to work more than the limits on regular and overtime hours allowed by the law of the country of manufacture and in accordance with the ILO convention 1. Except under extraordinary business circumstances, GEMELODY'S manufacturers', subcontractors' and suppliers' employees shall be entitled to one day off in every seven-day period. GEMELODY'S manufacturers, subcontractors and suppliers must inform their workers at the time of their hiring if mandatory overtime is a condition of their employment. GEMELODY'S manufacturers, subcontractors and suppliers shall not compel their workers to work excessive overtime hours. GEMELODY'S understands that those in management positions may exceed these limits in the course of carry out their roles and responsibilities.

Overtime Compensation: GEMELODY'S manufacturers', subcontractors' and suppliers' employees, shall be compensated for overtime hours at such premium rate as is legally required in the country of manufacture or, in countries where such laws do not exist, at a rate at least equal to their regular hourly compensation rate.

Contract Labor: GEMELODY'S manufacturers, subcontractors and suppliers shall not use workers obligated under contracts which exploit them, which deny them the basic legal rights available to people and to workers within the countries in which they work or which are inconsistent with the principles set forth in this Code of Conduct.

Discipline and Grievance Procedures: GEMELODY'S manufacturers, subcontractors and suppliers shall uphold the dignity and human rights of employees. In particular, they will ensure that employees are not subjected to harsh or degrading treatment, sexual or physical harassment, mental, physical or verbal abuse, coercion, or intimidation in any circumstance.



Gemelody shall carry out due diligence at regular interval. The due diligence shall be carried out for all business partners especially for minerals and metals suppliers.

Gemelody shall carry out due diligence process for minimizing a company's exposure to these risks when sourcing minerals.

GRIEVANCE MECHANISM:

Gemelody, Inc. has established this grievance procedure to hear concerns about Provenance claim, supply chain involving Diamond, gold or platinum group metals from conflict-affected areas or any other unethical trade practice.

The compliance officer is responsible for implementing and reviewing this procedure.

Provenance claim/Supply chain compliance related concerns can be raised by interested parties via email to: sales@Gemelody.com

Regarding risk management:

We will assess any supplier non conformance risk based on a three level scale

No Non conformance – Non

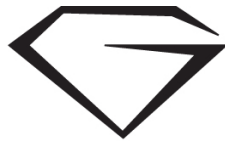
1 Non conformance – Low

2 or More Non Conformance – High

We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses.

GEMELODY'S manufacturers, subcontractors and suppliers shall clearly communicate the business's disciplinary process and related standards on appropriate disciplinary procedures and employee treatment and apply these equally to all management and staff.

Environment: GEMELODY'S manufacturers, subcontractors and suppliers should comply with relevant locally applicable environmental law and regulations. All waste materials and production byproducts should be disposed of properly and in an environmentally responsible



manner.

Diamonds Sourcing: GEMELODY'S manufacturers, subcontractors and suppliers shall only purchase and use only diamonds that have been purchased from legitimate sources in compliance with United Nations Resolutions and not involved in funding conflict. GEMELODY'S manufacturers, subcontractors and suppliers shall guarantee that all such diamonds are conflict free, based on personal knowledge and/or written guarantees provided by the supplier of such diamonds. We only buy or sale diamonds that are fully compliant with Kimberly Process Certification Scheme.

Gold Platinum and other Precious Metal Sourcing:

Gemelody shall adopt and communicate to their suppliers and the public a supply chain policy for sourcing gold and PGM from conflict-affected and high-risk areas. Gemelody shall comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Gemelody shall complete the due diligence process prior to initiate business relationship.

Gemelody shall ensure that all of its respective activities are in line with the OECD Due Diligence Guidelines, The Responsible Jewellery Council Standard and as per Universal Declaration on Human Rights laid down by United Nations.

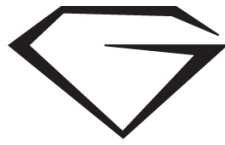
Gemelody shall prohibit any procurement from Conflict-Affected & High-Risk areas and adhere to compliance with standards on Anti-Money Laundering (AML) and Combatting the Financing of Terrorism (CFT).

Relevant Employees shall be trained on the Supply Chain & Due Diligence Requirement and OECD guideline at regular interval. We shall also provide support to our business partners and stakeholder for the same.

Gemelody shall carry out due diligence at regular interval. The due diligence shall be carried out for all business partners especially for minerals and metals suppliers.

Gemelody shall carry out due diligence process for minimizing a company's exposure to these risks when sourcing minerals.

Gemelody requests and encourages its supply chain to pursue a OECD aligned due diligence



approach.

Emerald, Rubies, Sapphire Sourcing: The gemstones are natural, genuine and authentic, not synthetic or manmade, and that these gemstones have been tested to verify this claim; these natural gemstones have not been treated; and they have not been treated or subjected to any other artificial processes or methods, with the sole exception of heat

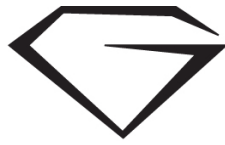
treatment as is specifically disclosed in our invoicing reports. If any colored gemstone is synthetic, these gemstones are specifically designated on an itemized invoice as synthetic

Independent Verification: GEMELODY'S manufacturers, subcontractors and suppliers agree to support the development of an independent third party verification system that verifies that diamonds, Gold Platinum and other precious metals meet the criteria set forth herein and other criteria.

Legal and Ethical Business Practices: GEMELODY'S manufacturers, subcontractors and suppliers must fully comply with all applicable local, state, federal, national and international laws, rules and regulations including, but not limited to, those relating to wages, hours, labor, health and safety, and immigration. GEMELODY'S manufacturers, subcontractors and suppliers must be ethical in their business practices.

Communication: GEMELODY'S manufacturers, subcontractors and suppliers are encouraged to take appropriate steps to ensure the provisions of this Code are communicated to their employees and their own supply chain. GEMELODY'S manufacturers, subcontractors and suppliers are also encouraged to ensure that the principles referred to above are adopted and applied by their employees, suppliers, agents and contractors so far as reasonably possible.

Penalties: GEMELODY'S reserves the right to terminate its business relationship with any supplier who violates this Code of Conduct or whose manufacturers, subcontractors or suppliers violate this Code of Conduct. GEMELODY'S reserves the right to terminate its business relationship with suppliers who fail to provide written confirmation to GEMELODY'S that they have a program in place to monitor their manufacturers, subcontractors and suppliers for compliance with this Code of Conduct.



Bribery GEMELODY takes a strict no tolerance policy when it comes to bribery by its employees or to its employees. GEMELODY will immediately suspend its relationship with any counterparty, upon the suspicion of bribery and will terminate any such relationship if those suspicions are confirmed.

Facilitation Payments- GEMELODY'S recognizes that it may deal in places where facilitation payments exist. At the present time GEMELODY'S does not believe that it is involved in any sort of facilitation payments and will continuously monitor to make sure that it does not get involved in any sort of facilitation payment.

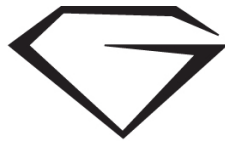
Universal Human Rights-

Universal human rights are often expressed and guaranteed by law, in the forms of treaties, customary international law, general principles and other sources of international law. The most well-known international human rights instrument is the Universal Declaration of Human Rights (UDHR), adopted by the United Nations General Assembly in 1948. The UDHR is considered to be a central component of international customary law, along with the International Covenant on Civil and Political Rights (CCPR) and the International Covenant on Economic, Social and Cultural Rights (CESCR). Together these form the International Bill of Human Rights.

The UN Guiding Principles on Business and Human Rights (also known as the “Ruggie Principles”) were adopted in 2011 and have become the primary reference for the private sector’s responsibility to respect human rights. The UN Guiding Principles recognize that companies have a responsibility to respect the rights outlined in them. Coupled with these UN instruments, the International Labor Organization (ILO) has identified fundamental principles in its Declaration on Fundamental Principles and Rights at Work. These are directly addressed in the RJC Code of Practices in the following provisions: Child Labor, Forced Labor, Freedom of Association and Collective Bargaining and Non-Discrimination.

The Guiding Principles define respecting human rights as:

- a. Avoid causing or contributing to (e.g. causing in part) adverse human rights impacts



through their own activities, and address such impacts where they occur; and

- b. Seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts.

We will use our best efforts to mitigate any violations through any means necessary: Including but not limited to leveraging its business relationship up to reporting them to the proper authorities.

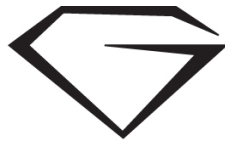
Know your Counterparty (KYC) – Gemelody requires KYC information from all its customers and vendors. That information will be updated from time to time based on any new information from Jewelers Board of Trade and or any public updates. Gemelody will request updated KYC at a maximum interval of 5 years

Reporting: Manufacturers, subcontractors and suppliers and their respective employees as well as employees of GEMELODY are required to report actual or suspected violations of this Code of Conduct to GEMELODY by calling GEMELODY'S's hot line number 1 (212) 730-7373 and Report Directly to Ahron Kavakeb. Any such report will be documented and addressed within 72 hrs. No reprisals will be made against any person making a good-faith allegation and the confidentiality of complaints will be maintained to the greatest extent practicable and consistent with GEMELODY'S's legal and other obligations. GEMELODY will take appropriate action to investigate all such reports, and take any and all action necessary to mitigate such violations. Gemelody will publicly report on its supply chain on a annual basis.

Disclosure: Gemelody will disclose the following on all its memos and invoices

For Diamonds- Carat Weight, Color, Clarity. On Certified goods we will add certificate number and Laboratory

For Jewelry- Metal Type, Metal Weight, Diamond weight, Color Stone Weight.



Any and all treatments or Synthetics will always be disclosed

Gift Registry: GEMELODY'S will keep a register of all gifts received in excess of \$100

Review- GEMELODY will review and ask its suppliers to review their policies at least once annually.

Any infractions will be reviewed within 30 days by compliance officer. Infractions deemed major will result in immediate suspension of the business relationship. Infractions deemed minor will be followed with a 90 day notice to cure and followed with communications to confirm the cure.

Reviewed and authorized by Ahron Kavakeb, Compliance officer as of April 6, 2026.

Supplier Risk Assessment /Due Diligence Report – Publication (Detailed report is with Compliance team and may produce to concerned parties upon request)

Due Diligence Steps	Name of Suppliers	
	Supplier Group A	Supplier Group B
Step 1: Establish strong company management systems	Yes	Yes
Supply chain policy	Yes	Yes
Management structure and responsibilities for due diligence programme	Yes	Yes
Record-keeping systems	Yes	Yes
Step 2: Identify and assess risk in the supply chain		
Assessment of supplying refiner's due diligence practices	Yes	Yes
Methodology of company supply chain risk assessments	RJC CoP/BPP	Non RJC-BPP
Actual or potential risks identified	Non	Non
Step 3: Design and implement a strategy to respond to identified risks (if applicable)		
Steps taken to manage risks, including involvement of affected stakeholders	Non	Non
Efforts made to monitor and track performance for risk mitigation	On Going	On Going
All instances of risk mitigation and results of follow-up after six months	Non	Non

The compliance team of GEMELODY, Inc has completed the due diligence and Risk assessment of all its suppliers with respect to latest RJC Cop standard and we found all our suppliers are complying with requirements.