

ACCUR8 DIAMONDS PRIVATE LIMITED

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GRIEVANCE MECHANISM

1. Purpose

This procedure outlines ACCUR8 DIAMONDS PRIVATE LIMITED's legitimate, rights-compatible, and effective complaints and grievance mechanism. Its purpose is to provide a clear, accessible, and transparent process for all stakeholders (employees, contractors, communities, business partners) to raise concerns, seek information, and resolve disputes related to our business operations and adherence to our policies, particularly concerning human rights-related issues. This mechanism also serves as a primary channel for providing for, or supporting legitimate processes to enable, the remedy of any adverse human rights impacts.

2. Principles of the Mechanism

Our mechanism is designed to be:

- **Consistent with Internationally Recognized Human Rights Standards:** Aligned with the UN Guiding Principles on Business and Human Rights.
- **Easily and Publicly Accessible:** Information on how to access the mechanism is readily available to all relevant stakeholders.
- **Communicated to Relevant Stakeholders:** Stakeholders are actively informed about its existence, scope, and how to use it.
- **Culturally Appropriate and Understandable:** Designed to be accessible and clear to diverse users, considering language and cultural contexts.
- **Unbiased, Equitable, Predictable, and Transparent:** Ensures fair treatment, consistent processes, and clear communication of outcomes, while protecting confidentiality.

3. Scope

This mechanism covers requests for information, and the raising and resolution of disputes and grievances related to ACCUR8 DIAMONDS PRIVATE LIMITED's operations, including, but not limited to, human rights impacts, labor practices, environmental concerns, ethical conduct, health and safety, and supply chain practices, as relevant to our adherence to our policies.

4. How to Lodge a Complaint/Grievance

Stakeholders can access the mechanism through the following channels:

- **Email:** yash@accur8diamonds.com
- **Direct Contact:** MR. YASH SANGHVI (+91 97129 99274)
- **Anonymous Reporting:** The online form and hotline allow for anonymous submissions where feasible, ensuring the integrity and confidentiality of the complainant.
Information on how to access the mechanism will be publicly available on our company website, employee handbooks, and posted in prominent locations within our facilities.

5. Grievance Process

The grievance process adheres to the following principles and steps:

5.1. Avoid Retaliation:

- Processes are designed to explicitly avoid retaliation for individuals or groups filing complaints or engaging the grievance mechanism. Any reports of retaliation will be investigated immediately and disciplinary action taken.

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5.2. Submission and Acknowledgment:

- Complainants provide details of their grievance. All received complaints will be acknowledged within 3 business days (unless anonymity prevents it). Submissions are logged securely.

5.3. Investigation and Assessment:

- **Impartiality:** Investigations will be conducted by trained management and personnel at the appropriate level who understand the sensitivities of the situation, particularly in human rights contexts. They will be free from conflicts of interest.
- **Fact-Finding:** This involves gathering information, interviewing relevant parties, and consulting with external experts if necessary.
- **Confidentiality:** Information is handled with the utmost confidentiality, protecting the identity of the complainant where requested or required.
- **Consultation:** For human rights-related grievances, appropriate consultation with Affected People or Groups will be undertaken in a culturally sensitive manner to understand the full scope of the impact and potential remedies.

5.4. Response and Resolution:

- **Timely Responses:** We ensure timely responses to requests for information, and timely investigation and resolution of complaints and grievances. Our aim is to provide a substantive response within 10 business days for requests for information, and to resolve complaints within 15 business days, depending on complexity. Complainants will be kept informed of progress.
- **Training for Handlers:** Training is provided to management and personnel about the complaints and grievance mechanism, including specific instructions on the respectful and sensitive handling of all grievances, particularly those involving human rights.

5.5. Implementation of Resolution and Remedy:

- Corrective actions and remedies agreed upon will be promptly implemented. This mechanism serves to provide for, or support legitimate processes to enable, the remedy of any adverse human rights impacts that ACCUR8 DIAMONDS PRIVATE LIMITED has caused, contributed to, or been linked with.

5.6. Non-Waiver of External Mechanisms:

- This mechanism or any resultant resolutions do not waive or preclude the individual's or group's right to have the same grievance addressed through other available external mechanisms, including administrative, judicial, or other non-judicial remedies.

5.7. Record Retention and Confidentiality:

- Records of complaints and grievances, including responses and outcomes, are retained as per our Human Rights Policy and Management System in a manner that protects the confidentiality and integrity of those filing the grievance, including where anonymity has been requested. Access to these records is strictly controlled.

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5.8. Review of Remedies and Corrective Actions:

- The remedies provided through the mechanism are regularly reviewed to determine whether corrective actions can be implemented to prevent or mitigate similar grievances in the future. This feedback loop informs our human rights due diligence process.

6. Monitoring and Review

- The performance of this complaints and grievance mechanism will be continually monitored and reviewed to determine if its outcomes are successful and if it remains rights-compatible and effective.
- Where gaps are identified, prompt corrective actions must be implemented.