

Compliance and Ethics
COM-COM-PO-0037-01
Vice President & Chief Ethics and Compliance Officer
05/10/2017

Corporate Social Responsibility Policy

Policy Statement

GIA is committed to respecting every individual. GIA celebrates the diversity of its employees and constituents, takes pride in providing fair and equitable treatment to all and strives to be socially and environmentally conscious in all it does. This Corporate Social Responsibility Policy ("Policy") embodies GIA's value of ethics and responsibility, which encourages promoting the highest standards of individual behavior, personal accountability and social responsibility as an Institute and in our external partnerships.

This Policy applies to all GIA employees and it is the responsibility of all employees to understand this Policy and to comply. Failure to comply with this Policy may result in disciplinary action, up to and including termination.

Responsibility

- 1. Responsible Executive President and CEO
 - 1.1 Maintains accountability for the substance, implementation and compliance of this Policy; and
 - 1.2 Oversees policy owner activities in the administration of this Policy.
- 2. Policy Owner Vice President & Chief Ethics and Compliance Officer
 - 2.1 Has operational responsibility for the Policy, procedures, instructions and forms under the direction of the responsible executive. This includes managing all phases of Policy initiation, development, approval, implementation, review and retirement processes.
- 3. Director, Manager and Supervisor
 - 3.1 Ensures that all departmental employees and Students are aware of this Policy by providing access, assistance, interpretation, application, and communicating the Institute's expectation for compliance.
- 4. Employee
 - 4.1 Understands that this Policy applies to them and conducts themselves accordingly.

Policy

- 1. Laws and Regulations
 - 1.1 GIA will adhere to the governing laws and best practices in the countries in which it operates.



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- 2. Internal Audits and Assessments, Certifications, Commitments
 - 2.1 GIA will conduct internal audits and assessments to ensure compliance with laws and conformance with certifications and commitments.
 - 2.2 GIA laboratories commit to being members of the Responsible Jewellery Council ("RJC") and commit to being independently audited against the RJC Code of Practices (an international standard on responsible business practices for diamonds, gold and platinum group metals) on the following schedule:
 - 2.2.1 Annual internal site assessments will be conducted by each laboratory and verified by internal site assessment teams; and
 - 2.2.2 Laboratories will undergo a third-party verification assessment by an independent auditing firm, at minimum, every three years.
 - 2.3 GIA will submit a Communication on Progress (COP) each year to the Secretary-General of the United Nations to confirm GIA's support of the U.N. Global Compact and to report on GIA's implementation efforts to support the Global Compact's Ten Principles within GIA's sphere of influence.
- 3. Anti-Bribery and Corruption
 - 3.1 GIA has a zero tolerance policy toward bribery and corruption and does not tolerate corruption in any form, including the bribery of government officials and inducements offered to others. GIA adheres to anti-bribery and anti-corruption laws in the countries in which it operates.
- 4. No Retaliation
 - 4.1 GIA prohibits retaliation against any individual who in good faith files a concern or is involved as a witness or participant in the concern investigation process. Engaging in unlawful retaliation will result in disciplinary action, up to and including termination or dismissal from GIA.
- Reporting a Concern
 - 5.1 GIA takes all concerns seriously. GIA's Concern Reporting program provides a uniform process for the raising, investigation and resolution of concerns by employees, students, clients, Partners and the public.
 - 5.2 Concerns may be raised using the following methods:

GIA's Concern Reporting System:

- Phone (Helpline): inside the U.S. and Canada dial +1 866-295-2625
- Phone (Helpline): outside the U.S. and Canada dial +503-726-2269
- Website: www.giawis.ethicspoint.com



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6. Workforce

- 6.1 GIA is an equal opportunity employer and does not discriminate in its hiring practices.
- 6.2 GIA prohibits unlawful discrimination or harassment.
- 6.3 GIA provides fair and equitable compensation and benefits that meet or exceed the laws and regulations in the countries in which it operates.
- 6.4 GIA supports and respects the fundamental dignity and the protection of internationally proclaimed human rights.
- 6.5 GIA respects the freedom of association and the effective recognition of the right to collective bargaining as permitted by law.
- 6.6 GIA will not restrict an employee's freedom of movement.
- 6.7 GIA will not engage in any form of forced or compulsory labor.
- 6.8 GIA prohibits child labor. GIA only employs those 18 years of age or older.
- 6.9 GIA prohibits any form of corporal punishment.

7. Health and Safety

7.1 GIA will maintain a safe and healthy environment for its employees, students, Partners and visitors, and will strive to continuously improve the Institute's culture of safety, health and environmental stewardship.

8. Environment

- 8.1 GIA will promote sustainable operational practices whenever possible, seek to reduce waste in its facilities and to abide by environmental safety standards in its global communities.
- 8.2 GIA will strive to use its resources efficiently to meet the needs of its employees, students and customers, while operating in a manner that is environmentally and socially responsible and economically sound.

9. Education and Support

- 9.1 GIA will strive to provide education and support for the communities in which it operates. Examples include:
 - 9.1.1 Develop and deliver education on responsible sourcing issues and responsible business practices.
 - 9.1.2 Provide government law enforcement seminars.
 - 9.1.3 Provide rough diamond evaluation training for government officials, miners and others.
 - 9.1.4 Provide free educational programs for school children, ranging in ages from 10-18.



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9.1.5 Partner with third-party nonprofit organizations (e.g., UN Women, the Diamond Development Initiative and Pact) to deliver training and education to mining communities.

Definitions

1. Definitions

Document Suite

Corporate Social Responsibility Policy

References and Related Documents

- 1. Anti-Corruption Policy and Compliance Handbook
- 2. Code of Conduct
- 3. GIA's Commitment to the U.N. Global Compact
- 4. GIA's Concern Reporting System
- 5. Policy Prohibiting Discrimination, Harassment and Retaliation
- 6. RJC Certified Members
- 7. Safety, Health and Environmental Policy
- 8. <u>U.N. Global Compact's Ten Principles</u>

Related Regulations

None

Revision History

Revision Date	Description	Approved by
05/10/2017	Initial Release	President's Policy Committee



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Definitions

1. **Partner**: Any non-employee of GIA who is contractually bound to provide some form of service to GIA.