

SANGHAVI SOLITAIRE INC

6WEST 48TH ST 7TH FLOOR

NEW YORK N.Y 10036

Human Rights Procedure

Sanghavi Solitaire Inc. upholds and supports the right to equal treatment without discrimination or harassment. Discrimination and harassment are strictly prohibited by the company. This Policy prohibits discrimination or harassment on the basis of the following grounds, and any combination of these grounds:

- Age
- Creed (includes religion)
- Sex (including pregnancy and breastfeeding) *
- Gender Identity* and Gender Expression*
- Sexual Orientation*
- Family status (such as a parent-child relationship)
- Marital status (including the status of being married, single, widowed, divorced, separated, or living in a conjugal relationship outside of marriage, whether in a same sex or opposite sex relationship)
- Disability (including mental, physical, developmental or learning disabilities)
- Race
- Ancestry
- Place of origin
- Ethnic origin
- Citizenship
- Colour

Anyone at **Sanghavi Solitaire Inc.** found to have engaged in conduct constituting any discrimination and/or harassment may be subject to disciplinary action, up to and including termination.

REPORTING WORKPLACE HARASSMENT

This section outlines reporting workplace harassment for Human Rights based on Discrimination and/or Harassment. **Sanghavi Solitaire Inc.** encourages the reporting of all incidents of harassment and discrimination, regardless of who the alleged offender(s) might be. All employees have a right to freedom from reprisals or threat of reprisals for refusing to accept harassment in any form, for making a formal complaint or cooperating in an investigation.

How to Report Workplace Harassment:

Partners or employees can report incidents or complaints based on discrimination and/or harassment verbally or in writing. The report of the allegations should include the following information: a) Name of the person who has allegedly experienced discrimination and/or harassment and contact information b) Name of (any) alleged harasser, position and contact information (if known) c) Names of the witness (if any) or other person with relevant information to provide and contact information (if known) d) Details of what happened including date, frequency and location of the alleged

SANGHAVI SOLITAIRE INC

6WEST 48TH ST 7TH FLOOR

NEW YORK N.Y 10036

Who to Report Workplace Harassment:

An incident or a complaint of workplace harassment should be reported as soon as possible after experiencing or witnessing an incident. This allows the incident to be investigated in a timely manner. Complainants are encouraged to report any incidents or complaints of discrimination and/or harassment to **Ms Hema Patel** hema@sanghavidiamonds.com

INVESTIGATING COMPLAINTS

Sanghavi Solitaire Inc. will ensure that an investigation appropriate in the circumstances is conducted when any complaint of workplace received. Complaints or incidents of workplace harassment will be investigated in a fair, respectful and timely manner.

The investigation must be completed in a timely manner, generally within 90 days or less, unless there are extenuating circumstances (i.e. illness, complex investigation) warranting a longer investigation.

Results of the Investigation After an investigation is completed, the parties to a complaint may be informed in writing of the results of the investigation and any corrective action taken or will be taken by Jay Gems Inc.

Confidentiality

Information about complaints and incidents shall remain confidential. Information obtained about an incident or complaint of workplace harassment, including identifying information about any individuals involved, will not be disclosed unless disclosure is necessary to protect employees, to investigate the complaint or incident or to take corrective action or otherwise as required by law.

Employees are free to file a Complaint with the New York State Division of Human Rights & following are the procedure –

If you feel you have been subjected to discrimination in housing, employment, credit, places of public accommodation, volunteer firefighting, or private non-sectarian educational institutions based on age, creed, race, color, sex, sexual orientation, national origin, disability, pregnancy-related condition, domestic violence victim status, marital status, military status, arrest record, conviction record, predisposing genetic characteristics or familial status you can file a discrimination complaint with the Division of Human Rights.

COMPLAINTS WITH THE DIVISION MUST BE FILED WITHIN ONE YEAR OF THE MOST RECENT INCIDENT OF DISCRIMINATION OR YOU MAY BE ABLE TO FILE DIRECTLY IN STATE COURT WITHIN THREE YEARS OF THE INCIDENT. FILING WITH THE DIVISION IS FREE OF CHARGE.

SANGHAVI SOLITAIRE INC

6 WEST 48TH ST 7TH FLOOR

NEW YORK N.Y 10036

Ways to file a complaint:

- File a complaint in person by visiting one of the Division's 12 offices in New York State. Locations are listed on the back of this flyer. You can also visit our website at www.dhr.ny.gov or call our toll-free number 1-888-392-3644 for more information.
- Visit our website and download a complaint form. Complete and sign it before a notary public and return it by mail or in person to one of the Division's offices.
- Contact any of the Division's regional offices by telephone or mail to obtain a complaint form and to request assistance in filing the complaint.

Regardless of the way you file a complaint be prepared to do the following:

- Identify and provide contact information whenever possible of the individuals, if any, who saw or heard something that can support your claim of discrimination.
- Identify any other individuals who, in a situation similar to yours, may have been treated differently or the same by the alleged discriminator.
- Provide specific details such as dates, statements and circumstances of the discriminatory incident.

Division of Human Rights Offices

HEADQUARTERS

The Bronx

One Fordham Plaza

Fourth Floor

Bronx, NY 10458

Tel. (718) 741-8400

Toll Free Number (888) 392-3644

REGIONAL OFFICES

Albany

Agency Building 1, 2nd Floor Empire State Plaza Albany, New York 12220 Tel. (518) 474-2705 (or 2707)

Binghamton

44 Hawley Street, Room 603

Binghamton, NY 13901

Tel. (607) 721-8467

Brooklyn

55 Hanson Place, Room 304

Brooklyn, NY 11217

Tel. (718) 722-285

Buffalo

SANGHAVI SOLITAIRE INC
6WEST 48TH ST 7TH FLOOR
NEW YORK N.Y 10036

65 Court Street, Suite 506
Buffalo, NY 14202
Tel. (716) 847-7632

Long Island (Suffolk)

250 Vet. Memorial Hwy.
Suite 2B-49 Hauppauge, NY 11788 Tel. (631) 952-6434

Long Island (Nassau)

50 Clinton Street
Suite 301
Hempstead, NY 11550
Tel. (516) 539-6848

Manhattan

163 West 125th Street
Fourth Floor
New York, NY 10027
Tel. (212) 961-8650

Office of Sexual Harassment Issues/Queens

55 Hanson Place, Room 900
Brooklyn, NY 11217
Tel. (718) 722-2060

Rochester

One Monroe Square
259 Monroe Avenue
Suite 308
Rochester, NY 14607
Tel. (585) 238-8250

Syracuse

333 East Washington Street
Room 543
Syracuse, NY 13202
Tel. (315) 428-4633

White Plains

7-11 South Broadway
Suite 314
White Plains, NY 10601
Tel. (914) 989-3120