

Responsible Jewellery Council (RJC)

Annual Report

Reporting Period:

1 January 2025 – 31 December 2025

Company Information

Company Name: Sant Enterprises Co., Ltd.

Head Office:

Bangkok, Thailand

Business Activities

Sant Enterprises Co., Ltd. is a Bangkok-based gemstone company engaged in the sourcing, manufacturing, cutting, polishing, and international trading of coloured gemstones. Our primary products include sapphires and rubies supplied to jewellery manufacturers, wholesalers, retailers, and luxury brands worldwide.

Sant Enterprises is committed to conducting business ethically, responsibly, and transparently throughout our supply chain while supporting sustainable development within the gemstone industry.

Managing Director's Statement

At Sant Enterprises, responsible business practices remain at the core of everything we do. During this reporting period, we continued strengthening our ethical sourcing procedures, compliance systems, employee welfare programs, and customer due diligence processes.

Our commitment to the Responsible Jewellery Council Code of Practices reflects our dedication to integrity, respect for human rights, environmental responsibility, and continuous improvement.

We thank our employees, customers, suppliers, and business partners for supporting our responsible business journey.

Our Commitment

Sant Enterprises is committed to:

- Ethical business conduct
- Human rights protection
- Responsible sourcing
- Anti-money laundering compliance
- Know Your Customer (KYC)
- Supply chain transparency
- Employee health and safety
- Environmental responsibility
- Continuous improvement

Governance

The company maintains internal policies covering:

- Responsible Business Practices
- Code of Ethics
- Anti-Bribery and Anti-Corruption
- Anti-Money Laundering
- Know Your Customer (KYC)
- Human Rights
- Employment Practices
- Health & Safety
- Responsible Sourcing

Management reviews compliance regularly and allocates appropriate resources to ensure implementation.

Responsible Supply Chain

Sant Enterprises purchases gemstones only from suppliers that comply with applicable laws and demonstrate responsible business practices.

During the reporting period:

- Supplier due diligence continued for all significant suppliers.
- Supplier information was reviewed and updated.
- Risk assessments were conducted where appropriate.
- Suppliers were informed of Sant Enterprises' Responsible Sourcing Policy.

High-risk transactions received enhanced review before purchase approval.

Know Your Customer (KYC)

Throughout the reporting period the company maintained its KYC procedures by:

- Verifying customer identity
- Verifying supplier identity
- Monitoring high-value transactions
- Reviewing beneficial ownership where applicable
- Maintaining customer records
- Monitoring unusual transactions

No confirmed cases of money laundering or terrorist financing were identified.

Anti-Money Laundering (AML)

Sant Enterprises maintains an Anti-Money Laundering program designed to comply with Thai regulations and international best practices.

The program includes:

- Customer Due Diligence
- Enhanced Due Diligence for higher-risk customers
- Record retention
- Employee awareness
- Transaction monitoring
- Escalation procedures

Human Rights

Sant Enterprises respects internationally recognized human rights.

The company:

- Does not employ child labour.
- Does not use forced or bonded labour.
- Does not tolerate discrimination.
- Provides equal employment opportunities.
- Maintains respectful working conditions.
- Encourages open communication.

No human rights complaints were reported during this reporting period.

Employment Practices

The company provides:

- Fair wages
- Legal employment contracts
- Paid leave in accordance with Thai labour laws
- Equal opportunity
- Safe working conditions

- Employee development

Employees receive orientation on company policies and ethical conduct.

Health & Safety

Employee safety remains a priority.

Activities during the year included:

- Fire safety inspections
- First aid availability
- Workplace housekeeping
- Emergency evacuation procedures
- Personal protective equipment where necessary
- Safe handling procedures

No major workplace accidents were recorded during the reporting period.

Environmental Responsibility

Sant Enterprises seeks to minimize its environmental impact by:

- Reducing paper usage
- Recycling office materials
- Conserving electricity
- Responsible waste disposal

- Efficient use of air conditioning
- Digital documentation where possible

The company will continue identifying opportunities to reduce its environmental footprint.

Business Ethics

Sant Enterprises maintains zero tolerance for:

- Bribery
- Corruption
- Fraud
- Money laundering

- Facilitation payments
- Conflicts of interest

Employees are expected to comply with the Company's Code of Ethics.

Training

During the reporting period, employees received awareness training covering:

- RJC Code of Practices
- KYC
- Anti-Money Laundering
- Responsible Sourcing
- Business Ethics
- Health & Safety

Training records are maintained internally.

Community Engagement

Sant Enterprises continued supporting charitable and community initiatives during the year, including contributions to educational and community development programs through organizations such as:

- Gems Keep Giving
- Gem Legacy
- Thai Sikh Patronage

The company remains committed to creating positive social impact beyond its commercial activities.

Performance Summary

Area	Status
RJC Compliance	Maintained
Human Rights Complaints	None Reported
Child Labour Incidents	None
Forced Labour Incidents	None
Bribery Cases	None
AML Violations	None
Major Health & Safety Incidents	None
Environmental Breaches	None

Objectives for 2026

Sant Enterprises aims to:

- Continue maintaining RJC certification.
- Strengthen supplier due diligence.
- Expand employee training.
- Improve ESG reporting.
- Increase digital documentation.
- Enhance responsible sourcing procedures.
- Continue supporting community initiatives.
- Improve environmental performance.

Declaration

Sant Enterprises Co., Ltd. confirms that this report represents our commitment to responsible business practices and continuous improvement in accordance with the Responsible Jewellery Council Code of Practices.

Approved by



SANTPAL SINCHAWLA

Managing Director

Sant Enterprises Co., Ltd.

Bangkok, Thailand

Date: 6 July 2026