

# Welcome to our 7th CSR report.



" Our sustainability efforts help us to maximize the shared value we build with our people and with every stakeholder we serve."



Product integrity and authenticity are becoming ever more important to the end consumer.

Expectations for diamond companies to conduct due diligence and take responsibility for their value chain are increasing as diamonds demand the highest level of ethical integrity. As an industry we need to work hard to retain confidence in our product and create a more transparent supply chain. We take our role of leading diamond company seriously, putting considerable effort in enhancing processes to guarantee the complete elimination of synthetics in our supply chain on the one hand and building provenance traceability on the other.

In these challenging times, Rosy Blue remains known for its exceptional diamond manufacturing expertise and customer service. It is the dedication, knowledge and excellent performance of our staff that continue to make our business great. Our sustainability efforts help us to maximize the shared value we build with our people and with every stakeholder we serve. Please read on to find details on our approach to sustainability and on the progress we have made on the issues that are most important to our business and you, our stakeholders. Whilst we want to reiterate our continuous commitment and performance, we are very aware that there always remains more to be done.

Amit Bhansali Managing Director Rosy Blue NV

Russell Mehta Managing Director Rosy Blue India Pvt. Ltd.



About Rosy Blue

Rosy Blue's position in the diamond supply chain

Our global presence

How we integrate CSR in our operation

2015 materiality exercise

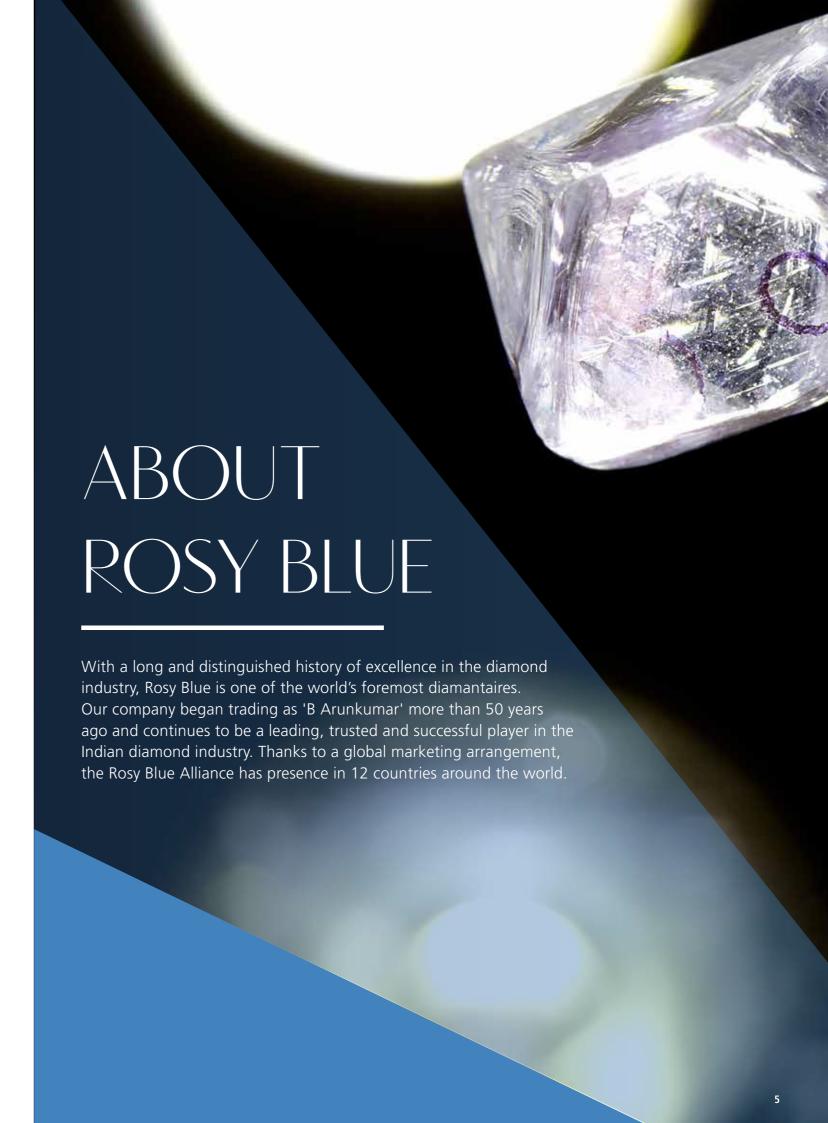
Compliance for Rosy Blue

Integrity throughout our supply chain

- $\bullet \ Ethical \ sourcing \ \& \ provenance \ traceability$
- Product quality & authenticity
- Responsible practices & respect for human rights

Our people

Our 2015 environmental impact



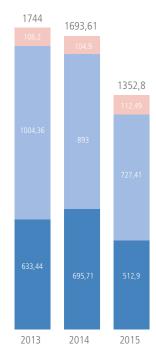
G4-4, G4-8, G4-9

# ROSY BLUE'S POSITION IN THE DIAMOND SUPPLY CHAIN

# ROSY BLUE

#### Turnover

#### **Rosy Blue Non India**



Rosy Blue India



figures are provisional.

The diamond jewellery supply chain, known as the diamond pipeline, is the process that brings diamonds from the earth's core to the consumer. The entire process from mined rough to polished stone generally takes from 18 to 30 months.

#### Rough sourcing & trade

Our close relationship with the world's premier diamond mining companies, including De Beers Global Sightholder Sales (DBGSS), Alrosa and Dominion Diamond Corporation, enables us to assure our client a regular and unrivalled supply of rough diamonds well into the future. We participate in all major tenders and auctions.

Our globally spread sourcing team also buys from all rough trading centers and across a full range of goods, but only from known and trusted suppliers. Depending on our own needs in polished stones, we trade the rough that will not be sent for manufacturing

# Our core business: diamond manufacturing

Our manufacturing centres combine the traditions of diamond craftsmanship with the most advanced polishing technology and highest technical standards.

We manage our production with an advanced series of internal control mechanisms to drive quality and maintain the integrity of the pipeline. Because of the large proportion of in-house manufacturing, we can minimize the risk of undisclosed synthetics entering our supply chain.

Our production ranges from rounds (from 0.005pts to 10cts+) to calibrated princess diamonds (from 0.03pts to 10cts+) as well as a wide variety of fancy shapes.

Rosy Blue adopts a value-driven approach to manufacturing: maximizing at every stage the value of the rough stone through superior makes and special cuts, offering speedier delivery and defining more accurate projections of demand. From large programmes of fine makes to distinctive special cuts, we deliver exactly what the customer needs.

#### Polished trade

Our clients for polished stones are a diverse group, ranging from the world's most prestigious international brands to large chain retailers catering to every price point, as well as small, speciality jewellers.

By combining our own manufactured diamonds with polished stones sourced from the open market, we ensure a consistent depth of inventory.

We have teams of key account managers across the world buying and selling specific weights and qualities of polished stones.
These specialists are in continuous, open communication with our rough diamond procurement

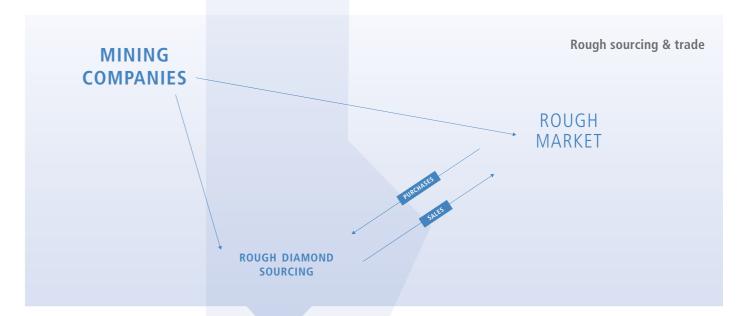
operations, to quickly pass on details of a customer's requirements. This is how we tailor our rough procurement as tightly as possible to the real-time demands of our customers, creating an unusually responsive and client-centred pipeline.

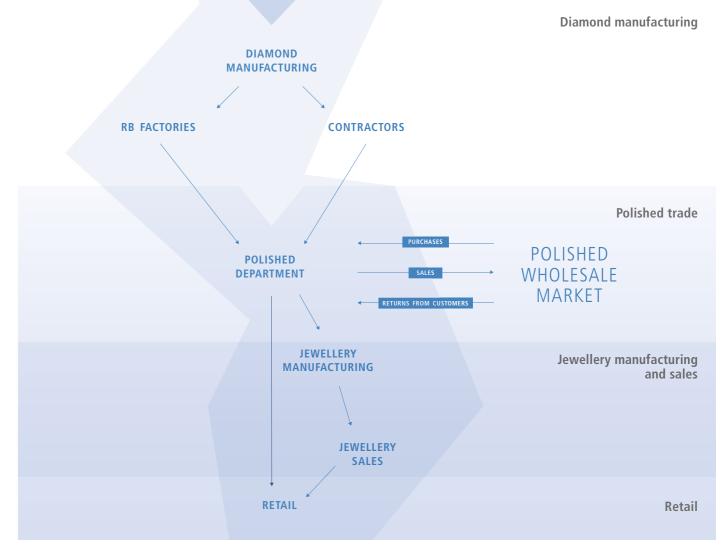
## Jewellery manufacturing and sales

Intergold is the jewellery manufacturing arm of Rosy Blue India, employing 300 people in our jewellery factory in India. Our marketing and distribution network spreads across the globe, with special expertise in the United States, Europe, Japan and Asia Pacific. Each zone is backed by a local service desk.

# Our retail brand ORRA in India

The final stage of the diamond pipeline is when diamond jewellery is sold by retailers to the end consumer. Rosy Blue India's retail brand ORRA has 35 stores in India, selling a full range of diamond jewellery. ORRA caters to the modern Indian customer by creating contemporary jewellery designs. The process from inception of the design to the final creation and the way it is brought in the stores is managed by the brand





Rosy Blue CSR Report 2015 I Rosy Blue's position in the diamond supply chain

# Diamond Industry Dynamics

#### **Demand Challenges**

In 2015, the industry witnessed a falling demand from China, India and the Middle East, as a result of anti-graft measures taken by governments, falling commodity prices and stronger US dollar. The US remained the largest and only stable market. Diamond prices dropped considerably during the year, which resulted in a drop of diamonds used in pieces of jewellery, leading to lower polished demand.

#### Pipeline de-stocking

Retailers, especially in China, reworked their inventory requirements to match a slower growth trajectory, again resulting in lower purchases of polished. The midstream was also handling their excess stocks. The lack of profitability pressured polishers to reduce their production and purchase of rough, which enabled the pipeline to destock, but affected rough demand and hence rough prices.

On the inventory front, Rosy Blue had been proactive in ensuring that stocks were optimized in line with requirements with a focus on inventory turns. Low inventory, coupled with adequate finance, allowed the company to make better use of opportunities to buy rough, when available during the year.

#### Access to bank finance

Bank finance was mildly stretched during 2015 when pipeline inventories were at their peak. However with lower production and inventory reduction, most companies were borrowing well below their limits.

Even when the market was stretched for liquidity, Rosy Blue had sufficient access to bank financing. Rosy Blue did, however, see some effects through late payments by its clients.

#### **Producers took actions**

Larger organized producers took the lead on price setting, maintaining a more stable rough price. This allowed the industry to work through some of the excess polished inventory, while leaving rough producers with an estimated 1.5-2.0 billion USD rough stock. On the other hand, smaller producers decided to follow market price of rough as it moved lower through most of their production.

Overall, both rough (secondary market) and polished prices fell respectively 19,6% and 10,7% during the year and only reached stable levels by the end of the year, as pipeline inventories stabilized.

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# OUR GLOBAL PRESENCE



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· Global CSR seminar

# HOW WE INTEGRATE CSR IN OUR OPERATION

# Corporate Governance as risk mitigation

We recognize the importance of good governance to prevent business and social risks within our company. To achieve this goal, we increase management efficiency and transparency by improving our internal control system. A number of corporate bodies have been established to create a sound balance of reporting.

RB India management board

CSR ADVISORY COMMITTEE

#### Our core values

> Integrity

we strive to uphold ourselves to consistently moral and ethical standards

Accountability:

and craftsmanship to all our stakeholders around the world

> Diversity

we embrace the diverse characteristics of all people who work with us and respect their dignity.

#### Rosy Blue Brand Council

Since Rosy Blue Non-India and Rosy Blue India are two independent legal entities (more info on page 38), a Rosy Blue Brand council has been established with the main function to manage growth and oversee the Rosy Blue Brand. Their task is also to maintain ethics and core values across our operations.

#### Members

Dilip Mehta, Dipu Mehta, Visha Mehta, Amit Bhansali, Ravi Bhansali, Russell Mehta, Viraj Mehta

#### **CSR Advisory Committee**

The main objective of the CSR advisory committee is to review and make appropriate strategic recommendations regarding Rosy Blue's CSR management and to monitor the conduct of business in accordance with the different compliance standards. Its 5 members come from different operational departments and complement each other in terms of their diverse professional expertise and excellent knowledge of the complex supply chain we work in.

## Know Your Customer (KYC) team

In many countries, gemstone dealers are classified as quasi-financial institutions because of the portable, high-value products that they trade. They are subject to the same regulatory framework as banks and other financial institutions.

Rosy Blue has a dedicated KYC officer in every entity who follows the 'know-your-customer' procedure to ensure that we verify and keep records on the customer's identity and the beneficial owners of the client company as per anti-money laundering (AML) requirements. As buyers, we are also subject to the same disclosure obligations to our suppliers. Compliance with applicable AML legislation enhances our ability to ensure the integrity of our supply chain and the legitimate nature of the goods that we trade.

#### No involvement in off-shores structures Panama Papers

named in press articles in which insinuations were made regarding the involvement of the Rosy Blue Alliance and affiliated companies in creating off-shore structures for illegitimate purposes. The conclusions made in this publication were misleading at the least. Rosy Blue has sent out a public message firmly stating that none of the entities of the Rosy Blue Alliance have any shareholding, directorship or involvement whatsoever in any off-shore structure referred to in the Panama Papers

# Rosy Blue acquitted in Monstrey case.

May 2016 the Belgian Court as acquitted Rosy Blue NV on I charges in the Monstrey case.

ne Monstrey case was the iggest-ever trial for diamond aud accusing 103 defendants of operating a system that neated the Belgium government out of half a billion euros of taxes over five years. The prosecution alleged that the immond transporter Monstrey forldwide Services set upour circuits that allowed its sustomers to import and export immonds without paying tax. epresentatives of Monstrey and 36 diamond trading ompanies were involved in the trial. The case came to light a 2005 and ended in the court ecision in May 2016.

We have always insisted on our innoncence and welcome the verdict. We want to close this chapter now and hope the media in the future will await the court decision before falsely accusing a company or a person in public.

### Our CSR model

Two central CSR departments are at the core of the leadership structure, one for Rosy Blue NI, one for Rosy Blue I. They hold responsibility for the alignment and steering of our global sustainability strategy. Some of their tasks are communicating externally, collecting data, and developing policies and procedures and monitoring their implementation. Our local CSR experts or compliance officers are responsible for implementing compliance and tailoring global, all-encompassing directives to local national and cultural needs.

A CSR liaison meeting was held in June 2015 to share knowledge and best practices across the operating companies and to train on new standards and procedures, including human and labour rights.



# 2015 CSR liaison meeting & training

#### Internal monitoring to know what happens where

The two central CSR departments evaluate compliance through an internal audit system and work proactively with our people to drive change.

Our documentation and supporting evidence review concentrates on determining how well an entity is managing the different areas of compliance (business, social and environmental) and what systems are



in place to monitor the implementation of the policies and procedures. Doing this exercise year by year enhances our capacity to find issues and rectifying them promptly.

Each year the 2 Central CSR Departments, in close coordination with the local CSR officers, audit a number of entities based on various risk criteria including geographic sensitivities, past audit performances and the nature of facility's work. In 2015, Belgium, Dubai, Thailand, India hosted an internal audit and China was audited in collaboration with Social Accountability International (SAI).

#### Our data collection platform

Our new CSR extranet is an interactive and dynamic platform that creates a more effective dialogue with the local CSR experts. The CSR extranet underwent many changes since its launch in 2013. The enhancements were completed in the first quarter of 2015 and all local CSR officers were trained on its functional use during the global CSR meeting.



















# 2015 MATERIALITY EXERCISE

# Stakeholder engagement

Stakeholders are at the heart of our business success and our sustainability approach: we need their feedback to keep on learning and play the right role in diamond's business.

Rosy Blue first identified internally the main sustainability issues (9 topics) we believe to be facing in our business.

After mapping our stakeholders, we consult with them about their key concerns and expectations. This is how we obtain common solutions and to tailor our communication channels to their needs.

Over the years, we identified many stakeholders. We consult them informally through the networks that we attend or participate in and annually through a formal stakeholder consultation. For this report we surveyed a selection of 35 stakeholders, with an important influence on Rosy Blue's business during the reporting period: suppliers, customers, governments, international organisations, local communities, financial institutions, NGO's, business organisations, academic institutions and our employees. We sought their feedback through an online survey to prioritize the main sustainability issues we are facing in our business.

		WHERE IS IT MATERIAL
GOVERNANCE		
	Implementing effective policies and procedures to prevent money-laundering and corruption, compliance with legal and regulatory standards (e.g. Kimberley Process), overall ethical way of doing business	
	Being compliant with international and national law, industry standards (e.g. RJC) and voluntary programs (e.g. SA8000)	
PRODUCT		
Product quality & expertise	Ensuring high quality diamonds and know-how. R&D: Using the latest technology in our operations and processes.	IN
	Ensuring the integrity of our diamonds though quality control procedures	IN&OUT
	Guaranteeing our diamonds have not been sourced in a way that does not respect human rights, labour rights and the environment nor to fund armed conflicts.	IN&OUT
	Being transparant about the provenance and journey of our diamonds (within the limits of confidentiality)	IN&OUT
SOCIAL		
	Protecting the health, safety & well-being of all Rosy Blue's employees (working conditions, working hours, training & education).	IN
	Supporting non-profit organizations and donating to charitable organisations and causes	IN
ENVIRONMENT		
	Minimising the impacts of Rosy Blue's operations on the environment (energy management in our factories, carbon footprint in our operation sites,)	IN

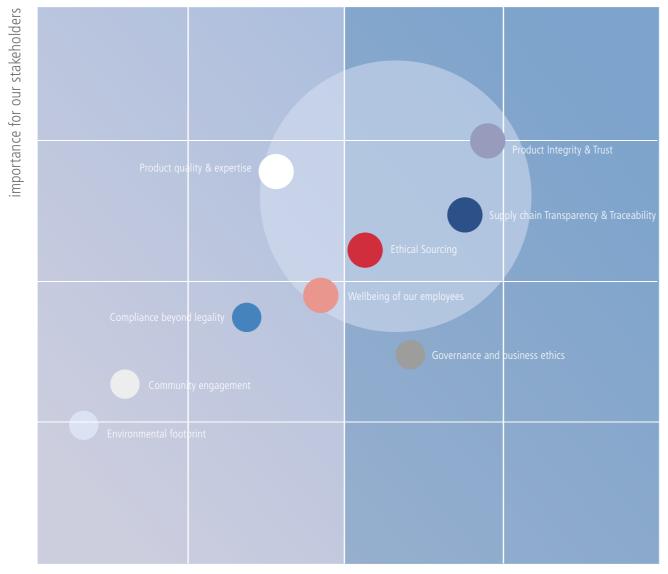
The survey was conducted in May 2016 and covered a total of 14 internal (management, employees) and 21 external stakeholders.

<sup>\*</sup> in (inside Rosy Blue), out (outside Rosy Blue)

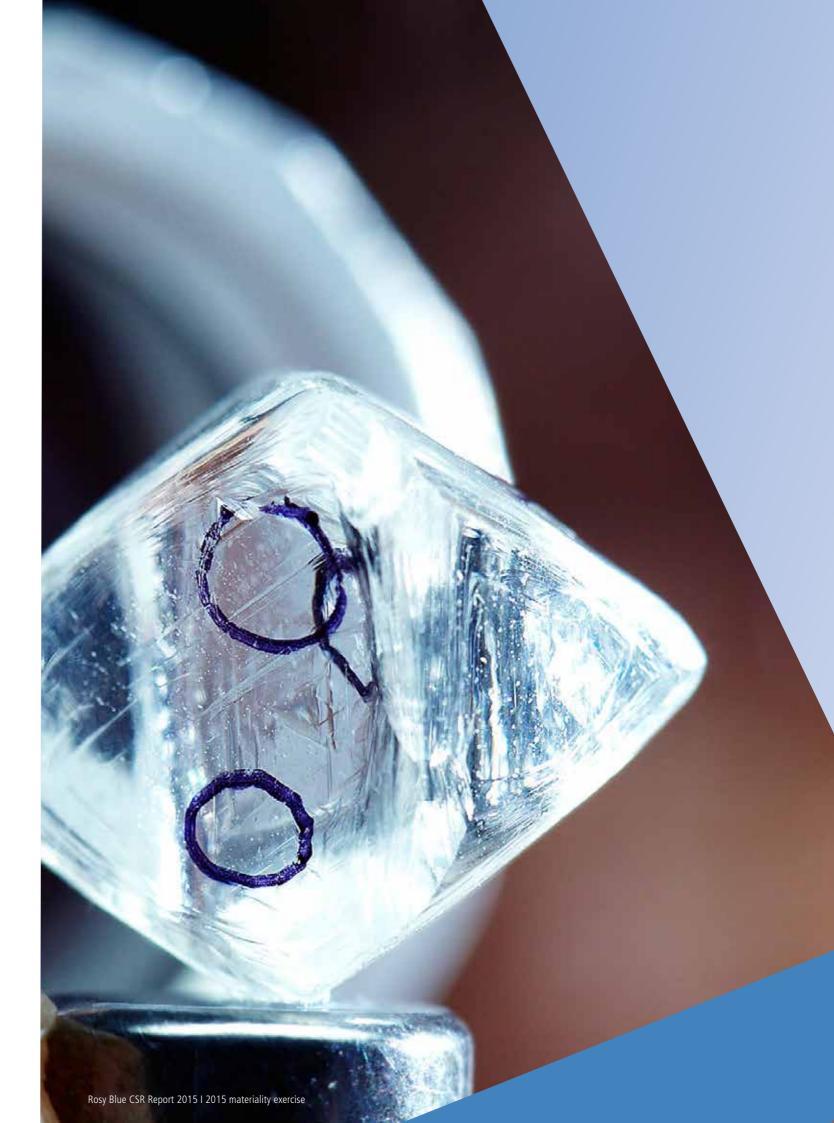
# Our CSR priorities

Our materiality matrix is the result of our survey: we decided to report on the most significant issues in the following chapters:

- 1. Ethical Sourcing & provenance traceability
- 2. Product Quality & Authenticity
- 3. Responsible practices & respect for human rights
- 4. Our people
- 5. Wellbeing of our employees



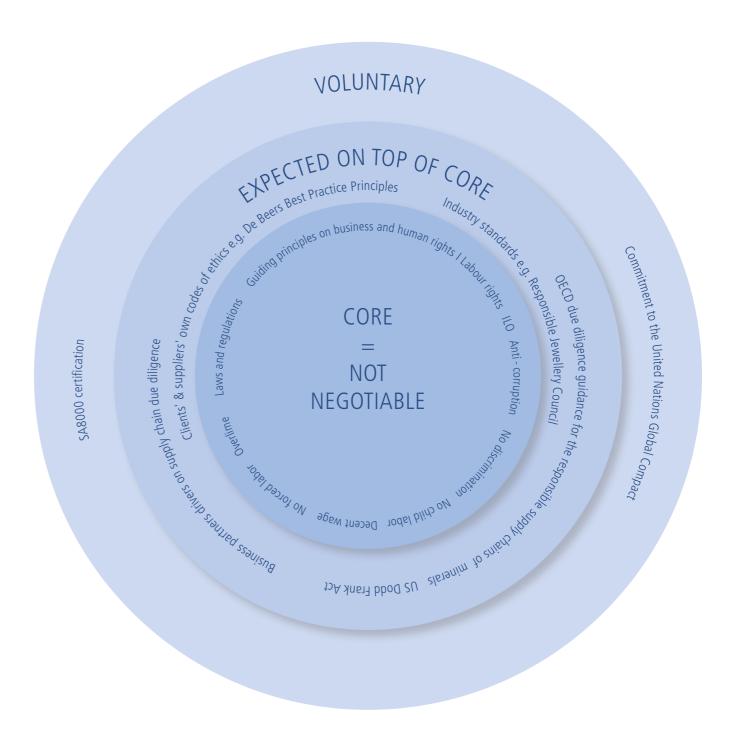
importance for Rosy Blue



# COMPLIANCE FOR ROSY BLUE

Compliance with international rules and regulations is a minimum responsibility for every company. But we also engage explicitly in a series of initiatives which we believe help us to continuously improve business and operating practices across the value chain and our markets. This is how we progress towards a meaningful social responsibility, tackling the issues most material to our business operations.

Diamond CSR dynamics: a very demanding operating environment



# Industry initiatives

There are several initiatives\*\* in the diamond industry that seek to help companies improve their impact on society and to enhance consumer confidence. These systems and certification schemes also serve as a platform to share best practices and challenges with other industry players. We also adhere to codes of different suppliers and customers, which for confidentiality reasons we have not individually and specifically mentioned here.

\*\* in this chapter the overview of initiatives is non exhaustive

#### **Fully RJC certified**



The Responsible Jewellery Council (RJC) is an international not-for-profit organisation, co-founded by Rosy Blue (NI) in 2005. RJC Members

are committed to promoting business practices in a transparent and accountable manner throughout the diamond, gold and platinum jewellery supply chains. Over 450 companies and trade associations have joined the initiative, representing the full supply chain. Rosy Blue NI held the position of Vice-Chair from 2013 to 2014 and has been actively involved from the start at Board and Committee levels. Our RJC certification requires us to be audited every 3 years by third-party independent auditors to verify our conformity with the RJC's Code of Practices.

Certification since: 2011 (NI) and 2013 (India)

All entities within the Rosy Blue business alliance referred (to on page 10) are RJC certified.

Our ongoing participation on the RJC enables us to exchange ideas and pool resources with industry peers and influence the development of industry standards.

The RJC has introduced the concept of provenance claims in 2014. This means making a claim or statement about the origin, history, provenance or other characteristic of the supply chain for gold, platinum group metals and diamond jewellery products to business customers and/or end consumers. So far we have not made any claims.

Abiding by De Beers 'Best Practice Principles'

#### BEST PRACTICE PRINCIPLES

The Assurance Programme

As a client of De Beers Global

Sightholder Sales (formerly known as Diamond Trading Company), we are contractually obliged to abide by their Best Practice Principles. The BPP Assurance Programme provides evidence to supply chain partners, consumers and other interested stakeholders that the exploration, extraction, sorting, cutting and polishing owned or controlled by the De Beers Group of Companies or by Sightholders, are undertaken in a professional, ethical and environmentally friendly and accountable way. BPP provides a means of checking compliance with requirements relating to anti-money laundering and terrorism financing activities, as well as independent monitoring to ensure that the obligations of the Kimberley Process are satisfied. External audits are selected annually by third party independ-

Compliant since: 2006 (inception of BPP)

ent auditor SGS.

The BPP Requirements incorporate other international

standards, such as the social compliance standard of Social Accountability International (SA8000) and the reporting guidelines of the Global Reporting Initiative (GRI).

# Results of BPP external audits per country

	2013	2014	2015
Armenia			
Belgium		•	
China			• 1INF
Hong Kong	•		
Israel			•
Japan			
Thailand	• 4 INF	• 5 INF	
UAE	•		
USA		•	
India	• 5 INF	• 4 INF	10 INF

INF= potential minor and major infringements. An infringement is a compliance issue that can be managed and rectified within a short or reasonable period. Both minor and major infringements require us to submit a Corrective Action Plan. Details on these infringements can be found on page 32.

#### Forevermark

#### **FOREVERMARK**



Launched in 2008, Forevermark is a proprietary diamond brand of De Beers. Every FM diamond must meet De Beers' Pipeline Integrity Standard — a set of rigorous responsible sourcing standards for the diamond industry. Written in conjunction with the British Standards Institute, it incorporates the Kimberley Process Certification Scheme and compliance to the De Beers Best Practice Principles assurance programme, as well as additional quality and integrity requirements. Only the highest quality diamonds are selected as Forevermark. Each one is inscribed with the FM icon and a unique identification number that provides quality assurance and enables traceability.

In 2015 our factory in China was independently audited and granted the Forevermark compliance in addition to our other 6 FM entities.

#### External FM audits per country

	2013	2014	2015
Armenia		•	
Belgium		•	•
Hong Kong	•		
Israel		•	•
Thailand	•	•	•
India		•	•
China			•

# 2. Voluntary commitments

#### SA8000



The SA8000 Standard is one of the world's

strictest social compliance standard for decent workplaces, across all industrial sectors. It is based on the UN Declaration of Human Rights, conventions of the ILO, UN and national law, and spans industry and corporate codes to create a common language to measure social performance. Most of the industry initiatives cover SA8000's scope, reinforcing the relevance to respect fundamental rights at work. More info on our commitment and progress can be found in the chapter on social performance.

# Our commitment to the Global Compact



Rosy Blue is committed to the 10 principles of the United Nations Global Compact since 2008, annualy

reporting on our progress. In 2011 Rosy Blue became member of Global Compact LEAD. This platform is designed to challenge highly engaged companies in the UNGC to reach further.

#### Advocating children's rights



In 2013, we have taken the leadership of a multi-stakeholder forum on

Children's Rights and Business Principles. The main objective of this forum is significantly increasing the awareness that children and youth are critical stakeholders of business. In 2015 we have started our first Children's rights impacts assessment.

# INTEGRITY THROUGHOUT OUR SUPPLY CHAIN

Product integrity and supply chain management are the cornerstones of our sustainability strategy. For Rosy Blue there are three facets to integrity, elaborated in the three next chapters. First, integrity means safeguarding a known, ethical and conflict-free provenance of our diamonds. Secondly, we need to guarantee the quality and authenticity of the diamond in all its physical characteristics. And thirdly, we need to ensure that all the steps to bring the finished product to the end consumer have been undertaken with transparent and responsible practices.

# ETHICAL SOURCING & PROVENANCE TRACEABILITY

Increasingly, businesses in the jewellery supply chain are being questioned about the source and journey of the diamonds, gold and platinum group metals in the products they sell. For a company the size of Rosy Blue traceability challenges are substantial, as the rough is bought in various locations and is then routed through procurement and sorting offices, before ending on polishing wheels in different factories.

## All our diamonds are conflict free origin

We apply the rough Diamond export and import verification system and controls as laid out by the Kimberley Process Certification Scheme and national legislation of the countries where we operate. We only supply diamonds that have been sourced from countries that are participants in the Kimberley Process and that have been legally exported with Kimberley Process certificate.

# Kimberley Process & System of Warranties

The Kimberley Process Certification Scheme (KPCS) was built upon the cooperative efforts of governments, the diamond industry and civil society and requires participating governments to tightly control the import and export of rough diamond. Certifying their origin is to prevent diamonds from potentially being used to finance armed conflicts by rebel movements from entering the market. \*

\*www.kimberleyprocess.com
We also fully comply with the
World Diamond Council System
of Warranties and make the following affirmative statement on
all our invoices:

"The diamonds herein invoiced have been purchased from legitimate sources not involved in funding conflict and in compliance with United Nations resolutions. The seller hereby guarantees that these diamonds are conflict free, based on personal knowledge and/or written guarantees provided by the supplier of these diamonds."

# We source from primary source mines and trusted suppliers

To preserve our high standards and reputation, we are extremely careful with the procurement of every rough diamond that we buy. We require our suppliers to propose only diamonds that have been procured through a conflict-free process and from sources that adhere to our standards of human rights.

# Tracking and tracing our diamonds through solid IT systems

The most advanced distribution

systems, allied with human vigilance, help us monitor every diamond passing through our manufacturing and finishing process. These processes are independently verified through our membership of the Forevermark Program in 7 of our operations.

For each entity, integrated IT systems have been set up in order to guarantee full transparency on every stone that is manufactured in house. The set-up cost for this project was substantial, but has proven to be a great learning exercise for the company.

#### • Fantasy system at Rosy Blue NI

The Fantasy system is a customized Enterprise Resource
Platform (ERP) solution based in
Israel, that includes tools for back
office management, manufacturing, accounting, etc.
The Fantasy system allows for
absolute tracking of every single
stone, as well as entire
lots, manufactured in-house, throughout
our entire global supply-chain, at
every stage.

Fantasy can track the history of any stone back to its origin and identify each activity and outcome. All Fantasy data is cloud managed and can be accessed remotely.

e.g. Canadian origin hallmark:
We use our traceability system to
be able to guarantee Canadian
origin of diamonds. Our factory in
Thailand is approved as manufacturing facility using the CanadaMark™ program, a trademark of

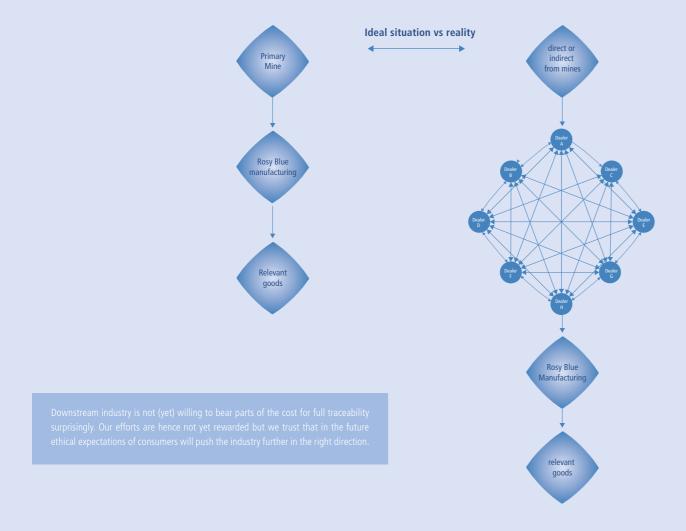
Dominion Diamond Corporation, one of our main suppliers. This origin hallmark signifies that the polished diamond is mined in Canada, natural and untreated, tracked from mine to polished and of standardized quality.

#### • JD Edwards at Rosy Blue I

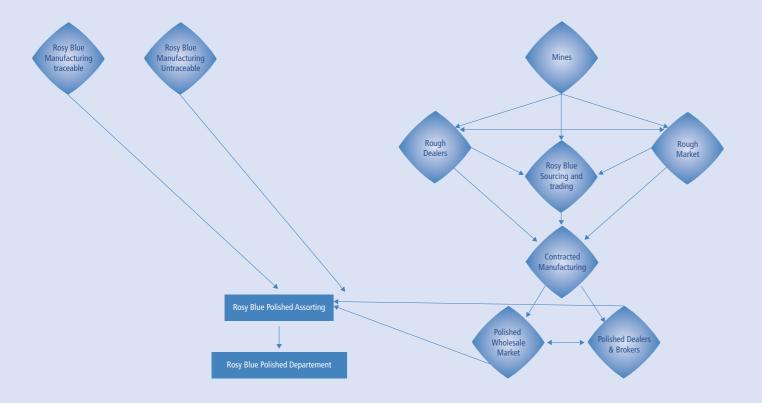
JD Edwards is the integrated applications suite of resource planning software that offers databases, operating systems and hardware to develop IT solutions to meet business requirements like a tight monitoring of all receivable and payables. It tracks each rough parcel from the time it is received till the completion of manufacturing process and the value addition made thereto. It is a notable improvement in operational efficiency.

### Traceability challenges

#### A. ROUGH DIAMOND SUPPLY LANDSCAPE



#### B. POLISHED DIAMOND SUPPLY LANDSCAPE



### PRODUCT QUALITY AND AUTHENTICITY

Buying a diamond or a piece of jewellery is all about trust. End consumers have generally limited technical knowledge of the products they are buying and rely on the advice and honesty of sellers throughout the value chain. It is our obligation to guarantee the authenticity of our diamonds and gold jewellery in all their physical characteristics. Product disclosure rests on the quality and veracity of the information that is disclosed to the consumer about the diamonds or gold he purchases.

#### Full disclosure at all times

Supply chain due diligence is combined with the right product information given to the end consumer. Full disclosure at all times is key throughout our processes. We acknowledge that in our sector, the non-disclosure of the potential treatment of natural diamonds, and the misrepresentation of simulants and synthetics as natural diamonds, undermines consumer confidence in the integrity of our product. Not only verbal disclosure prior to and during sale, but also written disclosure in each bill of sale, receipt, laboratory certificate or other documentation we give to our clients.

# Securing our supply chain against synthetic contamination

New technologies facilitate the treatment of stones and the creation of synthetic and simulant stones. This is making the supply chain and consumer market very complex. Undisclosed synthetics

have increasingly been reported within the natural diamond supply chain. The industry is looking at ways to defend its product with various actions to eliminate this risk and protect the end consumer.

#### What is a synthetic diamond?

For nearly 60 years synthetic diamonds have been produced in factories for industrial applications such as abrasives. Recent technological developments have enabled synthetic producers to create gem quality synthetics. The cost of producing a syntheticdiamond is about 40% lower than that of a natural diamond.

Gem quality synthetic diamonds are a genuine product in their own right. If sold with the proper disclosures, it offers consumers an alternative to buying natural diamonds. What affects the natural diamond industry and the consumers is the undisclosed mixing of natural and synthetic diamonds. This is clearly a fraudulent practice, which is not acceptable to any respectable participant in the sector.

#### 4C's of a diamond

Each diamond is unique. The quality and value of a diamond is defined by its 4 Cs: carat, colour, clarity

The weight or size of a diamond is expressed in carat

Most diamonds range in colour from colourless to slightly yellow. Diamonds can also occur in all ranges of colours, from brownish to striking yellow, pink, purple, red, blue and green. These are called 'fancy colours'.

With clarity, a diamond's purity is described. The clarity scale reflects the size, number and location of the internal characteristics. Diamonds that have no inclusions visible to the naked eye are of excellent quality and are called 'loupe clean'

A diamond's cut defines the proportion, polish and symmetry of the cut. A perfect cut equals more sparkle, brilliance and fire. Cut is not the same as the shape or form into which it was cut. Diamonds can be cut into various shapes, the best-known is probably the round brilliant.

\*source: www.hrd.be

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## Determining the risk in our pipeline

Rosy Blue wants to anticipate the risk of mixing natural with synthetic diamonds to protect its product integrity. Many steps within its scope are undertaken to bring the finished product to the end consumer: this includes mapping, controlling and minimizing all possible contamination points in our business. Each contamination point holds a different level of risk and hence requires a different type of action. We have determined at what stages testing is required and have rolled out and implemented our integrity procedures across locations. Thanks to our robust control procedures, no synthetic stones have been found.

#### Risk Analysis

.ow risk for own manufac :ured goods

For purchases certified by an external lab and goods coming back from our own manufacturing, we consider the risk for synthetic contamination low. However, since our in-house manufactured goods are often mixed with market purchases, we have decided to sample test anyway according to the sample procedure we follow for higher risk zones.

Incoming quality control for high risk zones

For non-certified polished purchases, contracted manufacturing and returned goods, we consider the risk high. This however is a very low percentage of our goods. On these goods we conduct stringent testing procedures to eliminate all risks.

# Made to measure integrity procedures

Rosy Blue NI and Rosy Blue I have different made-to-measureintegrity procedures. Detailed procedure documents can simply be obtained as an appendix to this report. We have elaborated the procedure for Rosy Blue NI.

#### Detection procedure for rough

Buying rough diamond from the market poses a medium risk for contamination. Since a simple visual distinction between unprocessed synthetic diamond and natural rough is possible, all rough parcels are checked by eye. The rough team of Rosy Blue NI is formally trained in identifying differences between natural and synthetic rough diamonds. In 2016 they received an official HRD course on hard-to-detect rough synthetics.

### Access to detection equipment for polished

To facilitate the detection of synthetics and test the goods, we use two kinds of detection equipment within our premises.

- 3 Automated Melee Screen ing ('AMS') (testing of 0.29 and below)
- 2 Diamond Sure (manual testing of 0.3octs and up)
  We work with the independent lab International Gemmological Institute (IGI) to do all the testing that we don't perform in-house like for instance on referrals and category 0.01ct and below.

#### 1.AMS TESTING PROCEDURE

The Automated Melee Screening (AMS) Device is designed to automatically feed, handle and dispense colourless or near-colourless and small polished diamonds to distinguish natural diamond from synthetic diamond and diamond simulants.

We use AMS for:

- Round brilliant diamonds in size range 1/5 Cts and smaller
- Fancy cut melee (Princess, Radiant, Square/Carre, Cushion, Emerald, Pear, Heart, Oval, Marquise, Baguette)

Testing of all small goods can put a heavy pressure on your business in terms of resources and cost. Therefore we test random samples of stones taken from each parcel. In our sampling approach it is essential that measures are taken to ensure that sampling is random. Minimum sample sizes have been developed based on BPP requirements and experience.

The AMS machine provides a log of every tested parcel and the outcome.

The sampling logic incorporates normal 'referral' rates resulting from both Diamond Sure and AMS, as well as the rate of type IIa occurrence in nature. Any sample with a passrate below 97% will be tested again. Any referral will be sent to an external laboratory for verification.

### 2. DIAMOND SURE TESTING PROCEDURE

Diamond Sure allows manual testing of only one diamond at a time.

For all high risk zones, we test 100% of 1/4cts and up, as long as the volume and hence the capacity of the machines allows us to do this.

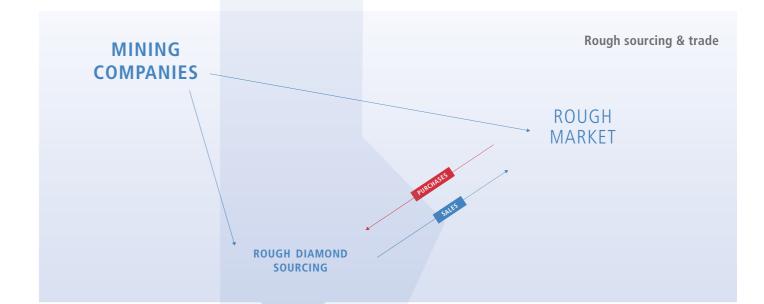
Any referral will be sent to external lab IGI for testing.

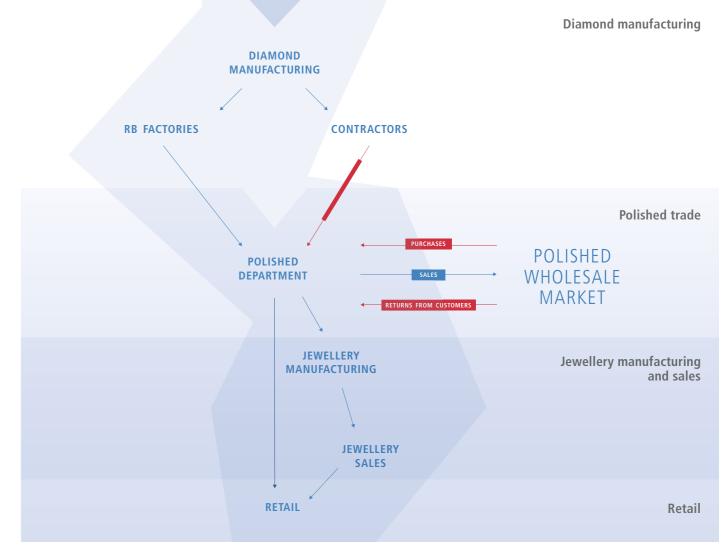
## 3. TESTING OF 0.01 CT AND BELOW

We only manufacture in-house for this category, which means that the risk for contamination is low. For all market purchases in this category, which we consider medium risk, sample testing is done by an external lab.

#### High risk zones







Rosy Blue CSR Report 2015 | Integrity throughout our supply chain

# RESPONSIBLE PRACTICES & RESPECT FOR HUMAN RIGHTS

All the steps to bring the finished product to the end consumer must be undertaken with transparent and respectable practices. The fact that we are certified RJC member and SA8000 applicant enables us to claim that all practices throughout our own operations are conducted in an ethical and responsible way, without any human right abuse or conflict.

#### HUMAN RIGHTS DUE DILIGENCE IN THE SUPPLY CHAIN

Because we buy rough directly from primary sources and trusted suppliers, we consider the human rights risks in our upstream supply chain as low.

Since 2015, we carry out a risk assessment to review our responsibility with respect to human rights, as a requirement for the RJC code of practices. The exercise allows us to proactively manage the Human Rights related risks of our supply chain. We have mapped any human rights impacts our company may cause or contribute to and how we can prevent or adverse these.

#### Managing our contractors

In 2015 we worked with 1 majority contractor and 50 minority contractors for Rosy Blue (NI), and 1 majority and 61 minority contractors for Rosy Blue (I). We focus on 'substantial contractors', being the contractors that generate 75% or more of the revenues of the contractor from one of our entities.

Each year, these majority contractors are selected for audit by SGS based on risk factors such as conditions in the country where a facility is located and the facility's past audit performance. In 2015, as a result of the risk assessment and desktop review by SGS, no majority contractor was audited.

We continued to enhance awareness in 2015 among our 'non-substantial' contractors by distributing our Business Partners Code of Conduct and a formal undertaking which we ask to sign off. Our Business Partners Code of Conduct will be revised in 2016, setting out our expectations of business partners. All ten principles of the UN Global Compact will remain incorporated in Rosy Blue's Business Partners Code of Conduct.

## OUR SOCIAL PERFORMANCE

# Beyond labour rights in our own operations

For Rosy Blue the term human rights refers to internationally recognised human rights, as expressed in the United Nation's (UN's) International Bill of Human Rights. Human rights include Labor Rights as stated in the International Labour Organisation (ILO's) core conventions and the Declaration on Fundamental Principles and Rights at Work.

Most of our operations and people are in manufacturing. Environmental and social standards for labour vary tremendously — for example, the national minimum wage, or working hours in a certain country may exceed or fall short of actual decent living standards. Because of this, we are committed to going beyond the minimum regulations as stipulated by local law.

We focus our efforts on those rights that are within our sphere

of influence and our working environment. We respect human rights primarily by providing safe and healthy working conditions for our employees and ensuring non-discrimination in human resource practices.

As we operate in some of the world's most complex economic, political and social environments, due diligence and continuous monitoring, (and where appropriate remediation) is key to implementing our commitment.

33.81% of our total workforce is covered by collective bargaining agreements, this percentage remained the same as in 2014.

# Thailand gets ready for SA8000:2014

In 2015 SAI conducted a gap analysis of our factory in Thailand. The primary aim of this task was to review the current social performance and to assess gaps and challenges. This paved the way for the implementation of a management system approach and the establishment of an action plan to comply with the SA8000: 2014 Standard. This factory is already performing very well and covered by our RJC ce tification. The assessment showed credible improvements to the human resource management since the previous audits while the working environment and productivity improved simultaneously.

#### What have we done

- Creation of important dialogue between management and workers through an 'open door' policy
  The workers' committee's efforts, in combination with their retention management system, has
  played a pivotal role in improving worker morale and reducing worker absenteeism and turnover.
- Employees are rewarded with a 'payment for performance' bonus and this has improved the productivity and enhanced motivation.

#### Recommended measures to be implemented:

- The company needs to address and improve compliance using the SAI management systems and take care of the issues that are identified in the internal and external audits. It should also implement social compliance expectations of their suppliers towards continual improvement.
- A system of regular internal audits, corrective and preventive actions and management reviews for other third party audits and other management systems should be effectively conducted.
- In sync with the current SA8000 International Standard, the management system for managing social performance indicators is yet to be fully established.
- The path forward is to use the 'social fingerprint' tool to evaluate the preparedness of the management systems and build a robust system that shall implement and sustain the social performance requirements.

Rosy Blue CSR Report 2015 I Integrity throughout our supply chain

#### **Social audits**

During the social audits of our entities in 2015 the following infringements were found. You can read below how we addressed and corrected the findings.

China	Periodic overtime and consecutive working days without a break exceeding RJC requirements.	Management systems have been enhanced to monitor working hours and we have implemented additional mechanisms to alert managers to overtime exceeding the maximum working hours set by the RJC and to increase man- agement accountability.	Closed
China	Signs indicating evacuation routes along the exit passageway in the factory workshop were higher than 1 meter.	The signs were adjusted promptly.	Closed
China		The accounts department was instructed to always pay out the workers as normal every month, with the monthly salary that is stipulated in the employment contract, even when down time occurs. This instruction is noted by the accounts department and communicated to the staff. Management will double check on a regular basis if this is being followed up as normal	
Thailand	Employees were not entitled full amount of days of leave during their first year of service within the company.	The local policy was adjusted and announced granting right amount of leave to all employees completing 1 year in the company.	Closed
India	The departmental exits and main exits open inwards.  The contracted security agency did not pay accurate overtime wages to one security guard	The entity has conducted regular mock drills so employees are familiar and installed appropriate firefighting equipment  Overtime was calculated and wages were paid accordingly.	Closed
	The food supplying agency had not obtained a renewed canteen hygiene certificate	The certificate was obtained immediately upon request.	



#### **Health and Safety**

Rosy Blue is committed to providing and maintaining a safe and healthy work environment for all employees, contractors and visiting members.

In general, the manufacturing process of diamonds does not pose any material safety risk in itself. The main health and safety risks are cuts to fingers, projection of parts of stones in the eyes and inhalation of dust during polishing.

All of our entities have appointed a Health & Safety Manager, responsible and accountable for ensuring compliance with our global policy and local regulations. They are supported by a Health and Safety team. In 2015, 140 people were involved in preserving health and safety across our sites.

#### Working accidents

We take all practicable steps to eliminate, isolate and minimise the risk of injuries or illness from identified actual and potential hazards. Our factories are staffed with a full time nurse. Some locations have a clinic and we monitor health of employees at regular intervals. All new employees undergo full health check-up within a month of their joining. We focus on wearing personal protective equipment (PPE) which makes a considerable impact in the occurence of accidents.

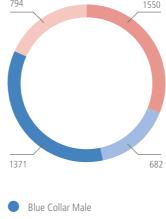
We call a major injury when a doctor is called or the person is hospitalized. In 2015 1 worker operating a polishing scaive broke his arm. Medical costs were entirely covered by our Social security fund.

	Minor Injuries	Major Injuries
2012	36	5
2013	48	3
2014	18	2
2015	18	1

# OUR PEOPLE people contractors

The fall in employees is due to further consolidation of manufacturing in Thailand and India.

Non-India India



Blue Collar Female

White Collar Male

White Collar Female

#### Our global workforce

In April 2016, the Rosy Blue Business Alliance employed 4397 people. The indirect impact of Rosy Blue is also significant through our supply chain, as we work with approximately 113 contractors (RBI and RBNI)

We view diversity in the broadest sense and draw our workforce from 17 countries, across cultures, genders, religions, languages and social backgrounds. This mixture of talents and innovative ways of thinking helps us reach customers and communities around the world. An overview of this diversity is shown on page 10.

#### Training our people on relevant subjects

We provide a variety of mandatory and voluntary, internal and external training opportunities for our employees to help them develop technical skills on the workplace, and gain the competences specific to their roles.

We communicate our global policies and procedures covering the subjects of compliance on our CSR extranet. Regarding CSR and compliance knowledge, the training material and toolkits can be adjusted by the local CSR expert as per the local reality and language.

In 2015, Rosy Blue recorded a total of 436 hours of CSR training mainly on compliance, human rights, social performance and management practices. The increase of 239 hours compared to 2014 is due to the 2015 CSR liaison meeting. Every compliance officer has organized a local training session for the relevant employees in his entity.

From 2016 on, energy efficiency training will also be provided in our factories.

#### Internal communication

We share positive stories with all our employees through an internal newsletter called 'Impressed'. The newsletter doesn't have a fixed frequency and covers community involvement stories, audit and certification results and general announcements.

Also our CSR extranet plays a vital role in our internal communication amongst compliance officers.



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# OUR 2015 ENVIRONMENTAL IMPACT

We are working to systematically making our operations, and especially our factories, leaner and more energy efficient by implementing environmental management systems.

#### Why is it material?

Our factories require energy and water to transform rough diamonds into polished stones.

# What have we done in 2015?

We are collecting data from all our entities on transportation and energy consumption. In 2015 we have continued to collect data on waste disposal (including chemicals), and water consumption.

Based on last year's investigation of funding mechanisms, we have organized energy audits in our factories. Our aim was to identify and quantify possible cost savings.

Our environmental partner, the Carbon Trust, is working on integrating these energy audits into tailored energy management training that will be given to our factory managers. The main goal is to improve the energy management capabilities of our key staff and to reduce carbon emissions for instance by advising on how to improve energy monitoring.

#### **Challenges ahead**

- We have not put in place measurable targets to reduce our emissions. Our priority is to track our organisational footprinting activity, strengthen Rosy Blue's reporting capabilities and increase awareness on possible energy reduction measures.
- Further energy management training may be defined and implemented in the future.
- We are considering whether to communicate emissions intensity on the basis of a per product or per turnover metric rather than per FTE. This would better reflect energy efficiency improvements to production sites.

#### 2015 – Rosy Blue Carbon footprint was 7,593 tonnes CO<sub>2</sub>e

In 2015, environmental data was collected which covers 18 sites in 10 countries, employing 3,818 people.



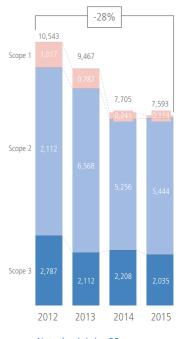
We calculate our organisational carbon footprint in line with Greenhouse Gas Protocol guidance. The boundary of our footprint includes:

- Onsite fuels and owned transport (Scope 1)
- Electricity consumption (Scope 2)
- Business travel and upstream impacts of electricity consumption and fuel usage (Scope 3)

We have excluded upstream Scope 3 emissions associated with purchased goods and services (diamond mining). Water consumption and waste disposal (including chemicals) is measured and monitored, however they are excluded from our carbon footprint. This is because they do not represent a material carbon impact.

#### **Evolution of our footprint**

In 2015, 94% of Rosy Blue's emissions were associated with 5 factories. This is to be expected given the higher energy consumption of manufacturing sites compared to offices. The highest energy consumption was at our jewellery manufacturing site in Intergold, India.



Note that it is in tCO<sub>2</sub>e

Since 2012 our organisational carbon footprint has decreased by 28%

Since 2014 Rosy Blue's footprint has decreased by 1% - despite the addition of two sites. This drop in emissions is due to:

- Decrease in the consumption of onsite fuels and owned transport across sites with 1%
- $\bullet\,$  Reduction in leased transport with 2%.
- Reduction in the electricity consumption at certain sites
- Reduction in business and first class air travel with 2%.

	2013	2014	2015
Full Time Employee Equivalent	5,491	4,135	3,818
Emissions Scope 1&2 per FTE	1.34 tCO <sub>2</sub> e	1.33 tCO <sub>2</sub> e	1.46 tCO <sub>2</sub> e
Emissions Scope 1,2 & 3 per FTE	1.82 tCO <sub>2</sub> e	1.88 tCO <sub>2</sub> e	1.99 tCO <sub>2</sub> e

Despite a reduction in absolute emissions, emissions per FTE have increased slightly. This is due to a shift in business activity and site numbers, resulting in lower absolute FTE numbers and higher business travel. The methodology used to calculate carbon intensity per employee has been amended to better reflect industry best practice and communication standards, such as those laid out by CDP.



# Statement of Sightholder Best Practice Principles for Rosy Blue NV and its Affiliates Compliance Status

**Date:** 15<sup>th</sup> July 2016

Rosy Blue NV and its Affiliates have been actively involved in the De Beers Best Practice Principles through the Rosy Blue NV and Rosy Blue India Sightholders since the initial cycle in 2005.

As part of each annual cycle the Sightholders have been required to submit self-assessment workbooks for all owned facilities. For the last few years they have also been required to submit for contractors with whom they represent 75% or more of their output.

These workbooks are reviewed by SGS for completeness and evidence is tested in relation to the compliance status declared. Further, a sample of facilities is visited to conduct a full on-site verification.

In addition, Rosy Blue NV is part of the De Beers Forevermark programme which requires all facilities used in the production of diamonds that are to be inscribed to be audited on an annual basis both for pipeline integrity and for compliance with the Best Practice Principles.

For the 2015 cycle, this resulted in 05 workbook reviews and 02 visits. No material breaches were found as part of this verification and they are compliant with the requirements of this programme and have provided corrective action plans where infringements were raised.

SGS has reviewed the summary of findings and statuses on Page 22 and 32 of the Rosy Blue Corporate Social Responsibility Report 2015 and can confirm that the information provided is aligned to the outcomes of the third party verification activities undertaken as part of the Best Practice Principles programme.

Signed:

Effie Marinos Sustainability Manager



# Statement of Sightholder Best Practice Principles for Rosy Blue (India) Pvt. Ltd and its Affiliates Compliance Status

**Date:** 15<sup>th</sup> July 2016

Rosy Blue (India) Pvt. Ltd and its Affiliates have been actively involved in the De Beers Best Practice Principles through the Rosy Blue NV and Rosy Blue India Sightholders since the initial cycle in 2005.

As part of each annual cycle the Sightholders have been required to submit self-assessment workbooks for all owned facilities. For the last few years they have also been required to submit for contractors with whom they represent 75% or more of their output.

These workbooks are reviewed by SGS for completeness and evidence is tested in relation to the compliance status declared. Further, a sample of facilities is visited to conduct a full on-site verification.

For the 2015 cycle, this resulted in 04 workbook reviews and 03 visits. No material breaches were found as part of this verification and they are compliant with the requirements of this programme and have provided corrective action plans where infringements were raised.

SGS has reviewed the summary of findings and statuses on Page 22 and 32 of the Rosy Blue Corporate Social Responsibility Report 2015 and can confirm that the information provided is aligned to the outcomes of the third party verification activities undertaken as part of the Best Practice Principles programme.

Signed:

Effie Marinos
Sustainability Manager

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eneral Standard Disclosures	Title	Page Number
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Emissions	G4-DMA	Page 36	
	G4-EN15	Page 37	Partially
	G4-EN16	Page 37	Partially
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LABOR PRACTICIES AND DECENT WORK	·		
Occupational Health and Safety	G4-DMA	Page 33	
	G4-LA5	Page 33	Partially, no percentage
	G4-LA6	Page 33	Partially, only injuries
	G4-LA7	Page 33	ok
Training and Education	G4-LA9	Page 35	Partially, total hours not per employee
Supplier Assessment for Labor Practices	G4-DMA	Page 30	
	G4-LA14	Pages 30 & 32	partially, not new suppliers
	G4-LA15	Pages 30 & 32	partially
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Investments	G4-HR2	Page 35	partially. Not only on Human Rights
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	G4-HR9	Page 22	partially, not total number
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	G4-HR10	Page 30	partially, not new suppliers, not percentage
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# About this report

# Reporting on our performance

This report has been prepared inspired by the core option of the Global Reporting Initiative G4 guidelines. The GRI content index is included at the end of the report. In addition this report serves as Communication On Progress for the UN Global Compact.

#### Assurance

To ensure the credibility of the report content on social audit results, this report has received independent third party assurance. The assurance statement is on page 39 and indication of assurance is in the GRI content index.

#### Reporting period

The scope of this annual report covers a 12 months reporting cycle, from 01/04/2015 until 30/03/2016, except where specifically indicated. We believe it is important to only focus on relevant changes and core matters.

#### Reporting scope

In this report we cover activities of the Rosy Blue Business Alliance, composed of:

- > Rosy Blue (India) Pvt Ltd and its subsidiaries in 5 countries, covering 9 entities, hereafter called Rosy Blue (I) (Rosy Blue India), headquartered in Mumbai, India
- > Rosy Blue Investments Sàrl and its subsidiaries in 11 countries, covering 24 entities, hereafter called Rosy Blue (NI) (Rosy Blue Non-India), headquartered in Antwerp, Belgium

Rosy Blue (I) and Rosy Blue (NI) are legally independent from one another and constitute the Rosy Blue Business Alliance. Rosy Blue is a common trade name used by the Business Alliance entities, which are distinct, privately owned and independently managed. In this report we refer to the Rosy Blue Business Alliance as 'Rosy Blue' for convenience reasons.

 $\hbox{\it ``*The term "subsidiary" is used to cover all types of parent companies and affiliate organizational structures.}$ 

\*There are also majority contractors

# For more information: contact details

Rosy Blue (NI)
Contact: Valerie Michel
Manager Corporate Affairs & CSR
Address: Hoveniersstraat 53,
Box 127,
2018 Antwerp,
Belgium
Tel: +32 (03)206 16 00
valerie.michel@rosyblue.com
www.rosyblue.com

Rosy Blue (I)

Contact: M. V. Chandrashekar
Vice President-HR & Admin
Address: Rosy Blue (India) Pvt. Ltd
Plot No11,Ashok Chakravarty Road
Opp Sweet Land Nursery
Mumbai 400 101
India
Tel: +91 (22) 6784 78 93
mv.chandrashekar@rosyblue.com
www.rosyblue.in

#### We welcome your feedback

