



Code of Conduct Policy

1. Introduction

BlueStone Jewellery and Lifestyle Limited is committed to establishing the standards we uphold for employee behaviour towards their colleagues, supervisors, and the organization.

While we encourage freedom of expression and open communication, adherence to our code of conduct is essential for all employees. It is important that they refrain from engaging in behaviours that may cause offense, involve themselves in significant conflicts, or disrupt the workplace.

Additionally, we anticipate employees to contribute to a harmonious, organized, respectful, and cooperative atmosphere.

Scope and effective date

The policy extends to all employees of the company and comes into effect immediately upon the date of joining.

2. Guidelines

2.1 Committed for Customer

Product and Services

BlueStone Jewellery and Lifestyle Limited shall be committed to providing the best possible product, service and after-sales support to all its customers. The company shall be committed towards maintaining the standard of product quality and provide maximum information regarding clarity and quality of the product. It is committed to providing the best-in-class experience for its customers.

2.2 Maintaining Business Ethics as Financial Entity and Otherwise

Financial Reporting and Records

The company shall prepare and maintain its accounts fairly, complying with all the accepted international standards of accounting and financial reporting and laws of the country. Any internal or external audit shall be a fair process and all relevant information shall be made available to the auditors and in turn all the findings shall be brought to the notice of the management. Any intentional misrepresentation of financial reports shall be regarded as a violation of Code of Conduct and may invite severe action which may lead to a criminal proceeding as per legal guidelines and termination of employment.

BLUESTONE

BlueStone Jewellery and Lifestyle Limited

[Formerly Known as BlueStone Jewellery and Lifestyle Private Limited]

Reg. off: Site No. 89/2 Lava Kusha Arcade, Munnekolal Village, Outer Ring Road, Marathahalli, Bangalore - 560037

statutorycompliance@bluestone.com

www.bluestone.com

CIN: L72900KA2011PLC059678

Corporate off: 302, Dhantak Plaza, Makwana Road, Marol, Andheri East, Mumbai - 400 059, Maharashtra.

Contact No: 080 4514 6904



Business Ethics

Every employee shall display high moral and ethical standards in practice during their employment and stand by honesty, professionalism, integrity, respect for others, fairness, confidentiality of information and transparency. Every employee shall be considered responsible for the implementation and compliance of the Code in his/her span of control. Any non-compliance may lead to severe consequences, including termination of employment.

Representing Company at Various Forums

The company, while providing information to stakeholders and other parties, needs to be appropriately represented. In all its public addresses, while disclosing a company's performance and business information to people such as the employees, investors, media, financial analysts, employees, suppliers and business partners, the company shall be represented only by authorized employees or third parties like auditors or lawyers. Any other non-authorized person shall not get involved in any divulgence of company's information at any public gathering/ forum.

Corporate Gifting and Donations

As a company and as company's employee, one shall neither receive nor give gift to any individual, vendor, government agency or officials. Any cash payment, valuables, offer made directly or indirectly through others, any illegal payments, gifts, donations or similar benefits that can obtain biased favor to/from the company shall be considered inappropriate. Notwithstanding the above, perishable items such as sweets or chocolates, if offered, may be accepted within the office premises and must be shared and consumed within the workplace.

Abiding The Law of the Land

Employees and the company shall comply with all applicable legal boundaries while conducting the business. The law of the land may differ as per the territories or state in which they operate and hence central as well as state legal guidance both shall be followed.

All employees are required to uphold the legal integrity of the company. This entails complying with all environmental, safety, and fair dealing laws.

2.3 Equal Opportunity Employer

The company shall provide equal opportunities to all its employees and all qualified applicants for any suitable employment without considering their race, caste, religion, origin, ethnicity, marital status, gender, sexual orientation, age, nationality or disability.

Employees shall be treated with due respect and the work environment shall be free from all hostility and harassment- mental, verbal or physical. All employment decisions shall be made purely on merit and shall be free from all kinds of positive or negative bias.

BLUESTONE

BlueStone Jewellery and Lifestyle Limited

[Formerly Known as BlueStone Jewellery and Lifestyle Private Limited]

Reg. off: Site No. 89/2 Lava Kusha Arcade, Munnekolal Village, Outer Ring Road, Marathahalli, Bangalore - 560037

statutorycompliance@bluestone.com

www.bluestone.com

CIN: L72900KA2011PLC059678

Corporate off: 302, Dhantak Plaza, Makwana Road, Marol, Andheri East, Mumbai - 400 059, Maharashtra.

Contact No: 080 4514 6904

**Respect at the workplace**

All employees should respect their colleagues. We won't allow any kind of discriminatory behavior, harassment or victimization. Employees should conform with our equal opportunity policy in all aspects of their work, from recruitment and performance evaluation to interpersonal relations and respect the privacy of their colleagues.

Corporate Social Responsibility

The company is committed to good corporate citizenship. The company intends to follow all the compliance norms, regulations and applicable laws. In addition, the company shall be committed to bring positive changes for less privileged people, environment and society and strictly prohibits child labour, bonded labour, forced labour or any other similar social injustice. The company is also committed to encouraging its employees for such voluntary as well as organizationally driven activities and shall support in every possible way.

Health, Safety and Environment

The company shall strive to provide a healthy, safe, clean and ergonomic working condition for its employees and shall work towards preventing wasteful practices and contribute towards healthy and green environment in and outside the office space in every possible way.

Respect for Human Rights

The company is committed to respecting and promoting human rights in all our operations and value chain. We uphold the dignity and fair treatment of every individual—employees, workers (permanent and contractual), suppliers, partners, and communities—while prohibiting forced labour, child labour, human trafficking, modern slavery, discrimination, and harassment. We ensure safe working conditions, fair wages meeting or exceeding statutory minimums, reasonable hours, and freedom of association, in line with the Constitution of India, applicable labour laws, UN Guiding Principles on Business and Human Rights, and ILO conventions. This commitment extends to our jewellery retail, sourcing, and manufacturing partnerships, where we expect equivalent standards from suppliers and contractors.

All employees receive periodic training on human rights issues. Any concerns or violations can be reported confidentially through our HR department, on the dedicated email Hr.compliance@bluestone.com, with prompt, fair investigation and no retaliation. The HR team monitors compliance, and leadership oversees integration into our culture. Violations may lead to disciplinary action, including termination or cessation of business relationships.

Job Duties and Authority

Employees should carry out their job duties with integrity and respect towards customers, stakeholders, and the community. Supervisors and managers must refrain from abusing their authority. We expect them to delegate tasks to team members based on their competence and workload. Similarly, we expect team members to follow instructions from their leaders and complete their duties efficiently and within the designated time frame.

Communication

It is essential for all employees to maintain open lines of communication with their colleagues, supervisors, and team members.

BLUESTONE

BlueStone Jewellery and Lifestyle Limited

[Formerly Known as BlueStone Jewellery and Lifestyle Private Limited]

Reg. off: Site No. 89/2 Lava Kusha Arcade, Munnekolal Village, Outer Ring Road, Marathahalli, Bangalore - 560037

statutorycompliance@bluestone.com www.bluestone.com CIN: L72900KA2011PLC059678

Corporate off: 302, Dhantak Plaza, Makwana Road, Marol, Andheri East, Mumbai - 400 059, Maharashtra.

Contact No: 080 4514 6904



Benefits

We expect employees to utilize their employment benefits responsibly and avoid any misuse. This includes but is not limited to time off, insurance, facilities, and other benefits provided by the company.

Policies

All employees are required to read and adhere to the company policies. If they have any questions or concerns, they should consult their managers or contact the Human Resources (HR) department for clarification.

2.4 Employee Responsibility

Parallel/ Dual employment

In accordance with the law of the land, an employee of the company shall not accept employment or a position of responsibility with any other company including providing freelance services, with or without remuneration.

Confidentiality of Information

Any employee of the company shall not divulge confidential information which he/ she has access to by virtue of his position/ by being in the company. His / her immediate family also shall not derive any benefit by accessing the information through the employee.

Such insider information can be any of the following (Non exhaustive list)

- Financial information such as profits, earnings, debt, margins etc.
- New launches
- Key attrition or joining
- Technology or new business partnerships
- Patents, copyrights and any tangible or intangible assets
- Future plans including investment, acquisitions, structural or financial restructuring etc.
- Details of various agreements

Additionally, employees shall strictly comply with applicable laws relating to Unpublished Price Sensitive Information (UPSI). UPSI refers to any information that is not generally available and which, upon becoming generally available, is likely to materially affect the price of the Company's securities.

Examples of UPSI include (as per applicable regulations) but are not limited to, the following:

- Financial results
- Dividends
- Change in capital structure
- Mergers, demergers, acquisitions, delistings, disposals, or expansion of business
- Changes in key managerial personnel

BLUESTONE

BlueStone Jewellery and Lifestyle Limited

[Formerly Known as BlueStone Jewellery and Lifestyle Private Limited]

Reg. off: Site No. 89/2 Lava Kusha Arcade, Munnekolal Village, Outer Ring Road, Marathahalli, Bangalore - 560037

statutorycompliance@bluestone.com

www.bluestone.com

CIN: L72900KA2011PLC059678

Corporate off: 302, Dhantak Plaza, Makwana Road, Marol, Andheri East, Mumbai - 400 059, Maharashtra.

Contact No: 080 4514 6904



Employees are strictly prohibited from directly or indirectly sharing, communicating, or using UPSI for personal gain or for the benefit of any other person. Any suspected misuse or leakage of UPSI must be reported immediately in accordance with the Company's policies.

Conflict of Interest

An employee shall always act in the interest of the company. An employee shall ensure that any business or personal association does not lead to a conflict of interest with the operations/ interest of the company or any relevant decision-making process directly or indirectly.

The following are the potential areas where conflict of interest may arise.

- a) An employee is in decision making position and is having an association/ relationship with a person who is doing the transaction on behalf of his/her company. Thus, decisions by employee can lead to his personal gain or gain to his relatives or associates.
- b) An employee is in position to have direct improper monetary gain for self or for associates/ relatives by influencing the decision-making process, directly or indirectly
- c) An employee is in a position of awarding benefits internally to the organization like salary, bonus, stocks, promotions or awards to associates/ relatives by being in position of influence directly or indirectly.
- d) Any other instance where an independent decision/ judgment/ interest of the company cannot be exercised leading.

The associations/ relationships may develop during the tenure of employment or may exist from earlier period. An employee shall make complete and relevant disclosure to the company's management at the beginning of the association or tenure of employment, whichever occurs earlier. It is also important for every employee to make a full disclosure of any interest which an employee's immediate family, including parents, spouse and children, may have in a company that is a competitor, supplier, customer, logistics partner or has other business dealings with his/her company.

An employee shall be forthcoming to share such details. In case management finds any such conflict of interest without employee sharing/ disclosing it, management may take appropriate steps against the employee in position of influence as well as the beneficiary.

The following positions held by employees are NOT considered as conflict of interest.

- a) Memberships / positions of responsibility of professional bodies and associations, wherein such association will benefit the employee and the company's brand
- b) Nominations / memberships in government committees.
- c) Any non-remuneration position in charitable/ educational trust(s)
- d) Any other exceptional circumstances, as determined by the management.
- e) Any such association shall be brought to the notice of other relevant stakeholders appropriately by the CEO and others involved in the decision-making process.

BLUESTONE

BlueStone Jewellery and Lifestyle Limited

[Formerly Known as BlueStone Jewellery and Lifestyle Private Limited]

Reg. off: Site No. 89/2 Lava Kusha Arcade, Munnekolal Village, Outer Ring Road, Marathahalli, Bangalore - 560037

statutorycompliance@bluestone.com www.bluestone.com CIN: L72900KA2011PLC059678

Corporate off: 302, Dhantak Plaza, Makwana Road, Marol, Andheri East, Mumbai - 400 059, Maharashtra.

Contact No: 080 4514 6904



Appropriate Usage of Company Assets

The assets of the company are provided for conducting business/ official work. They shall be employed primarily for the purpose of conducting the job and by the people who are authorized to use it. The assets include tangible assets such as facilities, equipment, materials and resources.

Intangible assets like intellectual property, relationships with business partners are also part of the company's assets.

3. Grievance Redressal

Grievance refers to any dissatisfaction, complaint, or concern related to employment conditions, work environment, company policies, procedures, practices, or interactions with colleagues.

3.1 Grievance Redressal Procedure:

- a. Submission:** The employee must submit a complaint through an email, outlining the nature of the grievance, including relevant details, dates, and any supporting evidence, to the HR team on Hr.compliance@bluestone.com
- b. Investigation:** The HR team will initiate a thorough and impartial investigation into grievance. This may involve conducting interviews, reviewing relevant documents, and gathering evidence.
- c. Hearing:** Upon completion of the investigation, a grievance hearing will be scheduled. The employees and any involved parties will have the opportunity to present their case and provide additional information or witnesses, if necessary.
- d. Decision and Action:** Following the hearing, a decision will be made based on the merits of the case and the available evidence. If the grievance is upheld, appropriate remedial actions or measures will be taken to resolve the issue.
- e. Appeal:** If the employee is dissatisfied with the decision, they may have the right to appeal within a specified timeframe. The appeal process will involve a review of the original decision by a higher authority or designated committee.
- f. Final Decision:** The decision made through the appeal process will be final and binding.

3.2 Disciplinary Actions

In cases where employees repeatedly or intentionally disregard our code of conduct, our company may find it necessary to implement disciplinary measures. The specific disciplinary actions taken will vary based on the nature and severity of the violation.

Potential consequences may include:

Demotion: Employees may be subject to a reduction in their job position or responsibilities.

Reprimand: Employees may receive an official written or verbal reprimand to address the misconduct and emphasize the importance of adhering to the code of conduct.

BLUESTONE

BlueStone Jewellery and Lifestyle Limited

[Formerly Known as BlueStone Jewellery and Lifestyle Private Limited]

Reg. off: Site No. 89/2 Lava Kusha Arcade, Munnekolal Village, Outer Ring Road, Marathahalli, Bangalore - 560037

statutorycompliance@bluestone.com www.bluestone.com CIN: L72900KA2011PLC059678

Corporate off: 302, Dhantak Plaza, Makwana Road, Marol, Andheri East, Mumbai - 400 059, Maharashtra.

Contact No: 080 4514 6904

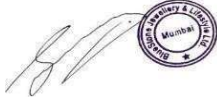


Suspension or Termination: For more serious offenses, employees may face temporary suspension or permanent termination of their employment.

Detraction of Benefits: In certain cases, employees may have certain benefits revoked or reduced for a defined or indefinite period of time.

Please note that the specific consequences applied will depend on the circumstances of each individual case.

Approved by
Board of Directors & Senior Leadership
BlueStone Jewellery and Lifestyle Limited

Policy Version	4.4
Policy version update	22 nd July 2026
Effective Date	01 st March 2023
Authorized Signatory	 Sudeep Nagar Chief Operating Officer

BLUESTONE

BlueStone Jewellery and Lifestyle Limited

[Formerly Known as BlueStone Jewellery and Lifestyle Private Limited]

Reg. off: Site No. 89/2 Lava Kusha Arcade, Munnekolal Village, Outer Ring Road, Marathahalli, Bangalore - 560037

statutorycompliance@bluestone.com

www.bluestone.com

CIN: L72900KA2011PLC059678

Corporate off: 302, Dhantak Plaza, Makwana Road, Marol, Andheri East, Mumbai - 400 059, Maharashtra.

Contact No: 080 4514 6904