



Know Your Customer and Due Diligence Screening Policy and Notice

1. Policy Statement

The reputation of Gemological Institute of America, Inc. (“GIA,” the “Institute,” or “our”) for integrity and ethical business practices is central to its mission of ensuring the public trust in gems and jewelry. This Know Your Customer (“KYC”) Policy is fundamental to protecting GIA’s reputation for integrity by preventing any involvement by GIA with any customer or other third party who might be involved in unethical business practices, is a sanctioned individual or entity or who would otherwise harm GIA’s mission or reputation. GIA is committed to ensuring that it only engages with ethical customers or other third parties. This Policy applies to all prospective and current customers or other third parties to whom we provide laboratory services.

2. Purpose

The purpose of this KYC Policy is to ensure that GIA provides laboratory services to individuals and entities who engage in ethical business practices, are not sanctioned individuals or entities and who comply with all applicable laws and regulations.

3. KYC Programs

- 3.1. GIA has developed risk-based KYC programs whose objectives, in part, are to: 1) mitigate the risks associated with money laundering, terrorist financing, bribery/corruption, fraud and other unethical or illegal conduct; and 2) ensure that GIA does not provide laboratory services to any sanctioned individual or entity.
- 3.2. GIA has developed risk-based due diligence procedures for identifying, investigating, reporting, monitoring and escalating concerns and suspicious activity and/or violations of our policies including the Anti-Money Laundering (“AML”) Policy, the KYC/KYS Due Diligence and Escalation Process, the Anti-Bribery and Anti-Corruption Policy, and the GIA Code of Conduct.
- 3.3. As part of the KYC programs, and to the extent permitted by law, GIA will:
 - 3.3.1. Collect appropriate personally identifiable information regarding its prospective and current customers including owners, officers, directors and beneficial owners or other third parties authorized by account owners to conduct business with GIA
 - 3.3.2. Verify the identity of the individuals, entities (and beneficial owners) of prospective and current customers including owners, officers and directors or other third parties authorized by GIA account owners to conduct business with GIA.

4. Due Diligence on Customers and Other Third Parties

- 4.1. All prospective and current customers including owners, officers, directors, beneficial owners and other third parties to whom we provide laboratory services, will undergo due diligence screenings and assessments performed by GIA’s ethics and compliance department.



4.2. The due diligence background screening may include any of the following searches, as allowable by local law and regulation:

4.2.1. Screenings for government sanctions, exclusions and other watch lists

4.2.2. United States sex offender registry

4.2.3. Civil and criminal court records

4.2.4. Other background information obtained from any law enforcement agency, administrator, government agency, court, information service bureau, including, but not limited to, criminal history

4.3. Agreement

By submitting personally identifiable information to GIA for consideration, you and your owners, directors, officers and beneficial owners and any other third parties authorized to conduct business with GIA, agree that GIA may undertake any of the above identified searches.

5. Monitoring and Updating Information

5.1. GIA will continue to monitor the activity of the customer or other third party, including conducting periodic due diligence screenings and/or investigations to ensure compliance with all applicable laws and regulations.

6. GIA's Right to Refuse to Do Business

6.1. GIA, at its sole discretion, may refuse to engage in a business relationship with or provide services to any prospective or current customer or other third party.

7. Responsibility

7.1. Vice President & Chief Ethics and Compliance Officer

8. References and Related Documents

8.1. [Code of Conduct and Professional Ethics](#)

8.2. [Corporate and Social Responsibility Principles](#)

8.3. [Supplier and Service Provider Code of Conduct](#)

9. Revision History

Revision Date	Description	Approved By
12/09/2019	Initial release	VP, Chief Ethics and Compliance Officer Compliance : Investigations : Internal Audit