



# Know Your Student 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 Student (“KYS Policy”) Policy is fundamental to protecting GIA’s reputation for integrity by preventing any involvement by GIA with any student who might be involved in unethical practices, is a sanctioned individual or who would otherwise harm GIA’s mission or reputation. This KYS Policy applies to all prospective and current students for whom we provide educational services.

## 2. Purpose

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

## 3. KYS Program

- 3.1. GIA has developed a risk-based KYS program whose objectives, in part, is 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 educational services to any sanctioned individual.
- 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 Policy, the Anti-Bribery and Anti-Corruption Policy, and the GIA Code of Conduct.
- 3.3. As part of the KYS program, and to the extent permitted by law, GIA will:
  - 3.3.1. Collect appropriate personally identifiable information regarding its prospective and current students
  - 3.3.2. Verify the identity of the prospective and current students.

## 4. Due Diligence on Students

- 4.1. All prospective and current students 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 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 student, including conducting periodic due diligence screenings and/or investigations to ensure compliance with all applicable laws and regulations.

6. Responsibility

6.1. Vice President & Chief Ethics and Compliance Officer

7. References and Related Documents

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

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

7.3. [Student Code of Conduct](#)

8. Revision History

Revision Date	Description	Approved By
08/17/2020	Initial release	VP, Chief Ethics and Compliance Officer Compliance : Investigations : Internal Audit