



**GIA<sup>®</sup>**

# **Code of Conduct**



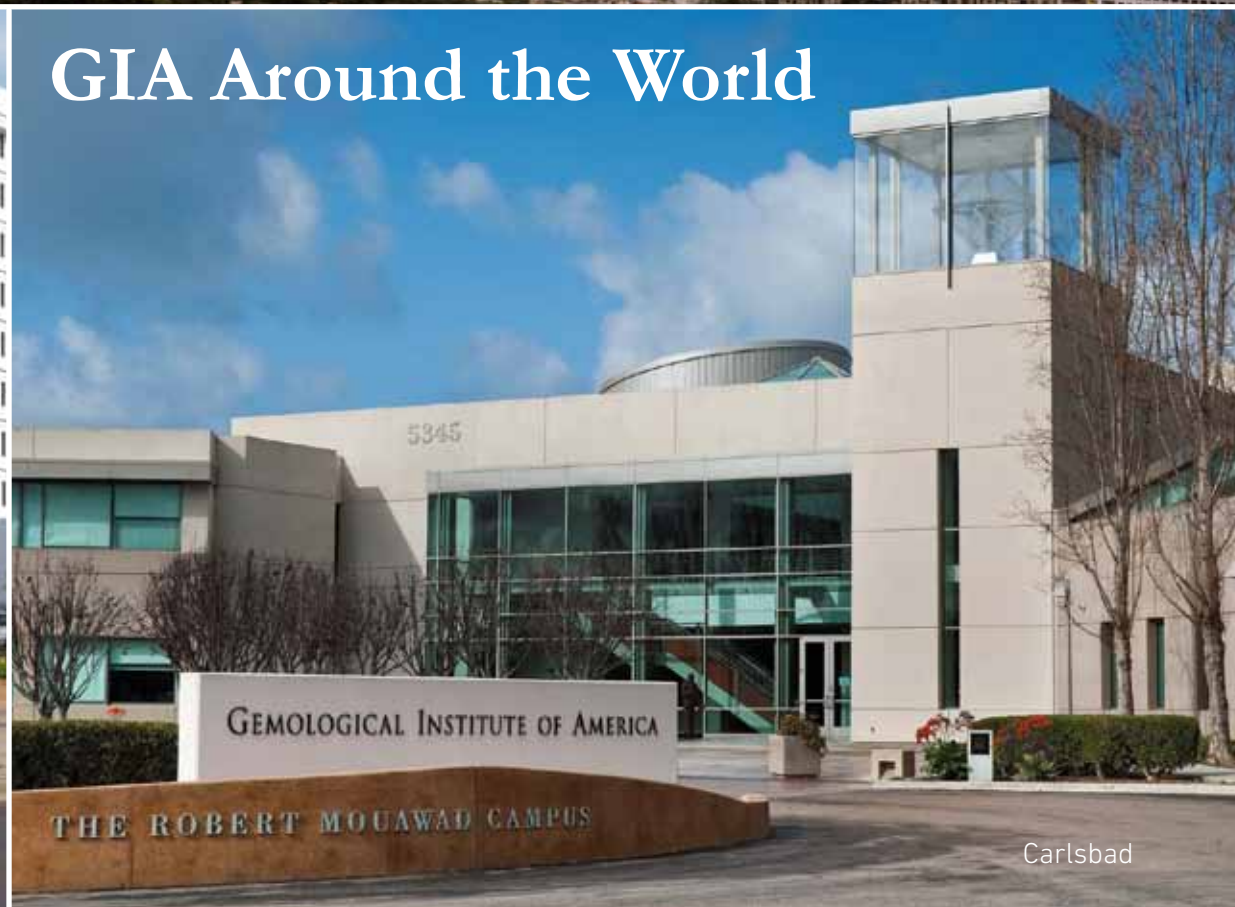


Taipei



Gaborone

## GIA Around the World



Carlsbad



Antwerp



Bangkok



A MESSAGE FROM  
SUSAN M. JACQUES  
*President and CEO*

Dear Colleagues,

I am pleased to say that recent years have brought a great deal of positive growth and change to GIA, due in no small part to your efforts. As GIA is now more global in its reach, it is important to re-commit ourselves to the values upon which our Institute is built.

Integrity is fundamental to the work that we do. To truly be the foremost authority in gemology, we must always be an impartial, independent organization. No matter what other changes may come to GIA, we will always be steadfast in our commitment to lead with integrity and the highest ethical standards.

GIA's Global Code of Conduct sets our values and standards. This Code applies equally to all GIA staff, regardless of position or seniority and will be implemented and enforced fairly and consistently.

Although our Code cannot cover every possible situation you might encounter, it is our guide for all of our job-related activities and decisions. If you are ever unsure as to

the most ethical course of action, please do not hesitate to ask for guidance from your manager or another point of contact listed in these pages. You can also make an anonymous report using the contact information provided in this Code. We expect that any report you make will be done honestly and in good faith, and, as such, you will always be protected from retaliation.

I am grateful for your dedication to the impeccable integrity and high quality results that are required to further GIA's mission. Thank you for your hard work and commitment to our Institute.

Sincerely,

Susan M. Jacques  
President and CEO

GIA's mission is to ensure the public trust in gems and jewelry by upholding the highest standards of integrity, academics, science and professionalism through education, research, laboratory services and instrument development.

## Our Core Values and Shared Culture

Personal and corporate **integrity** form the foundation of GIA's mission and are essential to the performance of each employee. By maintaining our integrity, we foster trust with the public, our students, the gem and jewelry industry and with each other.

GIA fosters a culture of continuous improvement where each individual is valued, respected and has the opportunity for professional growth and development. We continuously improve in every aspect and we value every person for their contribution to our mission.

Effective **teamwork** helps us combine our strengths to build a better Institute. We make every effort to demonstrate our commitment to excellence, knowing that cooperation and clear communication will make our workplace more productive. We value the willingness to go above and beyond, and we work to foster a service-minded approach, both within GIA and among our constituents.

GIA values **leadership** among its employees. As leaders, we work to foster an approach that considers the entire Institute over any individual department or location.

By demonstrating expertise and a clear understanding of GIA's mission and direction, we hope to inspire our colleagues to reach for the highest standards of excellence.

Showing **respect** to our colleagues and constituents makes us better team members and better leaders. We demonstrate a diligent work ethic and positive attitude regarding GIA in all of its locations and functions.

We strive for excellent **results**. We also strive for continued innovation to meet the dynamic needs of our constituents. We honor our commitments, and demonstrate both efficiency and effectiveness in our approach to work in order to assure a positive, mission-driven impact

## Our Promise to Our Constituents

We aspire to be an essential resource of gem knowledge, whose unbiased accuracy creates, promotes and ensures trust.

While we may operate in many countries and speak many languages, this single promise is a strong and constant reminder of GIA's unique benefit to the people, businesses and global interests who have a stake in gems.

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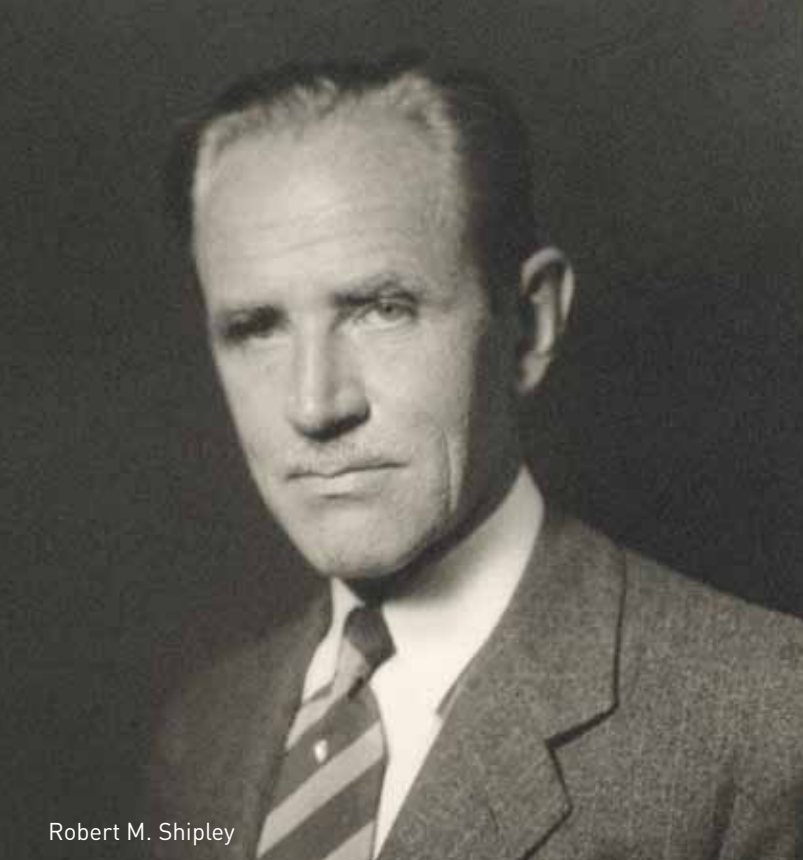
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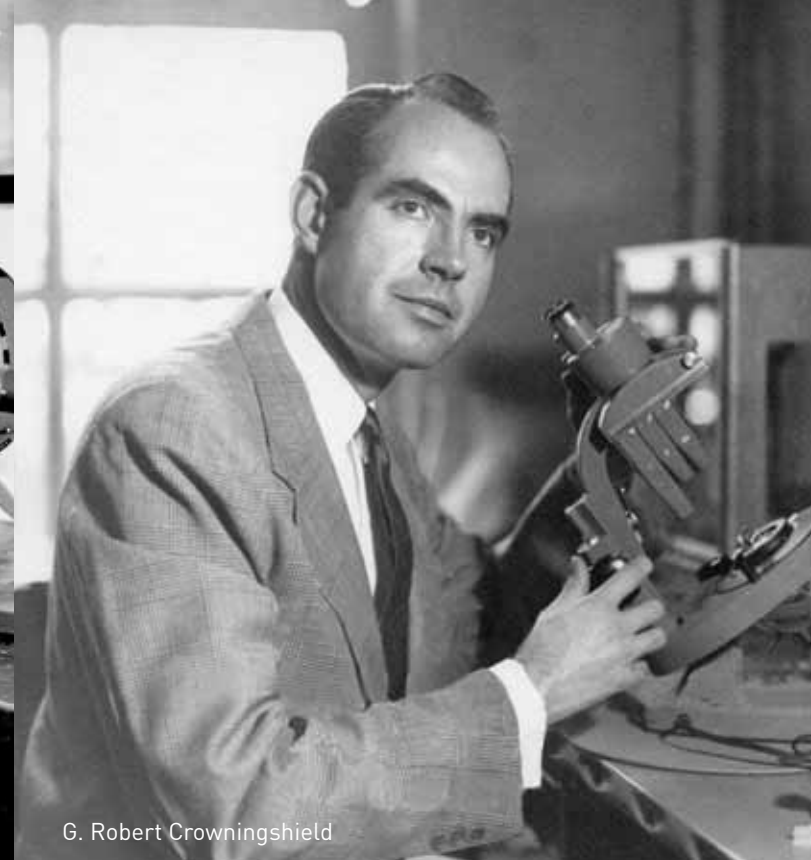




Robert M. Shipley



Richard T. Liddicoat



G. Robert Crowningshield

## GIA FOUNDING FATHERS

### Robert M. Shipley (1887–1978)

In an era when jewelers knew little about the gems they traded, Robert M. Shipley, a former retail jeweler, recognized that knowledge and ethical standards were key to protecting both buyers and sellers of gems. On February 15, 1931, Shipley and his wife, Beatrice, cashed in their savings to establish the Gemological Institute of America, initially offering mail-order courses in gemology and providing gem-testing services using borrowed microscopes

and other equipment. These modest beginnings led to Shipley's long-term vision—a world repository of gemological knowledge and the standard setter for evaluating gem quality, thereby helping to elevate the professional standards of the jewelry industry and protecting consumers worldwide.

### Richard T. Liddicoat (1918–2002)

Known as the “Father of Modern Gemology” and affectionately as RTL, Richard T. Liddicoat arrived at GIA in 1940 to assist with running the Institute's educational programs. He would go on to write the groundbreaking *Handbook of Gem Identification*, become the Institute's executive director and later, chairman of the board. He played an instrumental role in developing

the GIA International Diamond Grading System™ and establishing the practices we use to impartially and objectively determine diamond quality. Under his watch, GIA became a leading international education institution, grading laboratory, manufacturer of gemological instruments and research center. RTL touched the lives of tens of thousands in his career and he believed deeply in the value of education. He knew what it took to combine knowledge, research and practical training in such a way that transformed students into successful gem and jewelry professionals. RTL was a role model of integrity, believing that GIA's first obligation was to the advancement of gemology as a science and ethical profession in support of the jewelry-buying public.

### G. Robert Crowningshield (1919–2006)

A pioneer in gemological research, G. Robert Crowningshield joined GIA in 1947 and during his 60 year career collaboratively built a body of knowledge about gemstones and their treatments that the world relies on today. He developed the spectroscope as a key identification tool, and through painstaking observation and meticulous recording, created a database of light absorption patterns for almost every facetable gemstone used in jewelry. His contributions include the identification and characterization of diamonds colored yellow by irradiation and a wide array of synthetic gem material, trailblazing research on tanzanite and natural-color Tahitian black cultured pearls, the first reports on the laser drilling of diamonds and the development of the system of color terminology GIA uses to describe colored diamonds. Known for his modesty, even-handedness and impeccable ethical standards, Crowningshield helped to define the values we work by today.



## INTRODUCTION: ONE ETHICAL CULTURE, ONE ETHICAL CODE

### Why Do We Have a Code?

GIA's Code explains the conduct and behaviors expected of each of us as we uphold GIA's high standards of integrity. Our Code guides us to make ethical and sound decisions at GIA and to know when—and where—to ask for help. To our students, clients, customers and the public, GIA is a mentor, a trusted advisor and a protector. Our Code helps us maintain the trust we have earned from our constituents and ensures our ongoing value and relevance to the public we serve.

Our Code is the platform for all GIA activities. Therefore, we must read it carefully and at all times comply with the standards it sets.

### Who Must Follow Our Code?

Since GIA's reputation encompasses the sum of our actions, our Code applies to all GIA staff worldwide. Each of us is a living example of our Code and, therefore, we must uphold our commitment to integrity at all times. We also expect that our suppliers, agents, business partners, consultants and licensees will follow similar principles when working on our behalf.

### What Laws Must We Know and Follow?

One of the challenges of being a global institution is knowing and understanding the various laws in the locations where we do business. Laws are often complex and will vary from one country to the next. We must know and follow all laws and regulations that apply to our work at all times. Many of

these laws are outlined in our Code and GIA policies. If you are ever unsure of what laws or regulations you must follow in a particular location, you are encouraged to contact GIA's Corporate Counsel for guidance.

## KNOWING WHAT IS EXPECTED OF US

### Our Shared Responsibilities

As members of a global institution, we share the responsibility of protecting our constituents' trust. First and foremost, we each must abide by the standards set forth in our Code, GIA policies and the law. By doing so, we represent our Institute honestly, accurately and with integrity. In situations not addressed by our Code or GIA policies, we are expected to use our ethical judgment to disclose these instances as needed and to demonstrate the highest ethical standards as we interact with each of our constituent groups on a global basis.

### Additional Responsibilities for Supervisors and Managers

GIA supervisors and managers are expected to foster a respectful, professional work environment. They should be available to answer any questions or concerns related to our Code, seek assistance whenever they have a question and to escalate any issues that are reported to and/or observed by them. In addition, they are expected to encourage those who report to them to come forward with concerns or reports of misconduct, and never retaliate against those individuals for making a disclosure. Finally, supervisors and managers are expected to take an active role in promoting compliance with our Code and the law. They must take reasonable actions to detect non-compliance. If they suspect a violation, it is their responsibility to take immediate, appropriate action including reporting the situation.

## SEEKING ADVICE & REPORTING CONCERNS

We are required to report<sup>1</sup> any violations of our Code or the law. In doing so, we help preserve our Institute's reputation for honesty and integrity. Our input is always required by the Institute, as GIA can only solve problems once they are made known. Therefore, it is up to each of us to ask when we need help, and report any actions or situations we feel may violate our Code.

### When seeking advice or reporting concerns, you may contact:

Your supervisor or manager

The director of Global Compliance, vice president of Human Resources or Corporate Counsel

The GIA Ethics Hotline: Call toll-free 866 295 2625 (US and Canada) to file a report. If you are calling to submit a report from outside of the US and Canada, please ask your local operator to place a collect call to the US phone number + 503 748 0577 or report online at [www.ethicspoint.com](http://www.ethicspoint.com).

The GIA Ethics Hotline is available 24 hours a day, seven days a week. It is operated by an independent third-party provider, and translators are available to assist you in all of the languages GIA colleagues speak. If you wish, you may seek advice or make your report anonymously—GIA will never attempt to learn your identity. However, anonymous reports are more difficult for our Institute

to thoroughly research. You are always encouraged to identify yourself when calling or filing an online report with the Ethics Hotline. If you choose to file anonymously, you should provide as much specific detailed information as possible to facilitate a thorough review and check back regularly for updates and questions.

### Investigations of Reports

GIA will promptly investigate all concerns and complaints thoroughly and fairly. At times, you may be asked to participate in the investigation process. If you are called upon to aid in an investigation of reported misconduct, you are expected to comply with the request. Every effort will be made to protect your confidentiality during and after the investigation, consistent with the law. Should an initial determination conclude that the item is not strictly an ethics violation the report may then be redirected within GIA, such as to Human Resources for further follow up.

### No Retaliation at GIA

GIA understands that it can be difficult to speak up if we fear retaliation. Therefore, GIA takes a strict “no retaliation” stance toward all questions, complaints and reports of actual or

potential misconduct. This means that GIA will not permit retaliation against you for making a good faith report.

Reporting in “good faith” means that you provide all the information you have, and you believe it to be true. Even if an investigation of your report reveals that misconduct has not occurred, you will be protected from retaliation of any kind if your report was made in good faith.

It is important that we each feel comfortable and secure when making a report. If you feel you have witnessed or experienced an act of retaliation, you should report the incident to a supervisor or member of leadership you trust, the director of Global Compliance, vice president of Human Resources, Corporate Counsel, or to the GIA Ethics Hotline.

Integrity, Respect, Results, Teamwork and Leadership define who we are and how we behave as an organization. Personal and corporate integrity are the foundation. By behaving ethically and with honesty, we foster trust with the public, our students, the gem and jewelry industry and with each other.



### Consequences of Code Violations

GIA is an institution of uncompromising integrity, and our Code is an important component of our ethical culture. As such, we take Code violations very seriously. Therefore, any violations of our Code will be met with swift yet fair disciplinary action, up to and including termination. In addition, certain violations may also subject GIA and the individuals involved to the possibility of civil or criminal liability.

If you have any questions or concerns about our Code, seek guidance before making a decision. For additional guidelines, please refer to your *GIA Employee Handbook, Work Rules and other company approved policies*.

<sup>1</sup>Except as prohibited by the laws of a country or jurisdiction.



## HONESTY & INTEGRITY FOR OUR COLLEAGUES

### We Maintain a Respectful and Inclusive Workplace

As members of a global institution, we each bring a diverse set of ideas, talents and abilities to GIA. Our Institute recognizes the value in such diversity, and is committed to upholding respect and inclusion in all aspects of our work. Therefore, at GIA, we treat each other with dignity at all times. In doing so, we contribute to our long-standing tradition of honesty and integrity.

#### Commitment to a Workplace Free of Harassment and Discrimination

Respecting each other as individuals means we only make employment decisions based

on personal merit—not on personal traits or characteristics protected by law. GIA's policy is to ensure that employment decisions are not based on such traits, including, but not limited to, race, religion, color, national origin, sex, age, disability, veteran status, marital status, sexual orientation or any other classification protected by law. Making any employment-related decisions based on such traits is considered unlawful harassment in many countries, and is not tolerated by GIA.

Harassment is not acceptable and is not tolerated at GIA. Harassment may be sexual

or nonsexual in nature, and the definition may vary from one country to another. At GIA, harassment includes any unwelcome conduct that has the intent or effect of creating an intimidating, offensive or hostile work environment. It can take many forms, including physical actions, spoken or written remarks and videos or images. GIA is committed to protecting its employees from harassment, both from within GIA and from any of GIA's constituents.

In addition, sexual harassment can include unwelcome sexual advances, requests for sexual favors or other physical or verbal conduct of a sexual nature. Regardless of the form it takes, harassment creates a negative, uncomfortable environment for all of us. It shows a lack of integrity and detracts from the level of respect we each worked hard to foster. Therefore, harassing behavior shown toward or

by any staff member, student, client or vendor will not be tolerated.

If you believe you have witnessed or experienced an act of discrimination or harassment, you should immediately report the incident to a supervisor or member of management you trust, the director of Global Compliance, vice president of Human Resources, Corporate Counsel, or to the GIA Ethics Hotline. Remember, GIA will investigate all reports of misconduct, and you will never experience retaliation for raising a concern. For additional guidelines, please refer to your *GIA Employee Handbook, Work Rules and other company approved policies*

### We Uphold Workplace Safety and Health

GIA is committed to the safety and well-being of each individual. It is important for each of us to uphold this commitment by acting in a safety-conscious manner at all times. This means, in part, that we abide by all of the safety procedures in place in all of our facilities -laboratories, office environments, classrooms and parking lots. We must never ignore or work around the rules in the locations where we work. In addition, we each have a responsibility to immediately report any accidents, injuries, or unsafe acts or conditions.

If you observe any unsafe acts, or suspect that you are working under unsafe conditions, you have a duty to disclose the issue to your immediate supervisor and the Global Safety

Manager. For additional guidelines, please refer to your *GIA Employee Handbook, Work Rules and other company approved policies*.

#### Workplace Violence Prevention

As GIA colleagues, we are all responsible for maintaining a positive and safe work environment—including one that is free of violence. Therefore, we must never take—or tolerate—any action that is threatening, intimidating or harassing. Any violent or threatening behavior should be reported immediately to a supervisor or GIA Security. If you or your colleagues face immediate danger, contact the local authorities.

GIA is a strictly non-violent institution and our commitment to security spans across all educational campuses and workplace locations. Accordingly, GIA seeks to have a zero tolerance policy with respect to violent, harassing, or threatening behavior. For additional guidelines, please refer to your *GIA Employee Handbook, Work Rules and other company approved policies*.

#### Drug and Alcohol Abuse

Another part of maintaining safe, healthful and efficient working conditions is avoiding drug and alcohol abuse. By working under the influence of drugs or alcohol, we create risks for ourselves and our fellow colleagues. Therefore, you may not possess, distribute or be under the influence of alcohol or illicit drugs while on GIA premises or when conducting GIA business. GIA reserves the

right to intervene in support of this policy. Please note that these rules extend to the improper use of prescription or over-the-counter medication, as well.

Different countries have varying laws concerning the use of drugs and alcohol. All employees on assignment for GIA are required to abide by the laws of the country in which they reside.

For additional guidelines, please refer to your *GIA Employee Handbook, Work Rules and other company approved policies*.

### We Practice Fair Employment for All

GIA is deeply committed to upholding fair employment practices across the globe. In support of this commitment, we firmly abide by international laws governing working hours and wages. We also respect human rights in all of our operations by refusing to engage in child or forced labor. If you believe that GIA—or any of our business partners—is failing to uphold this commitment, or may be violating applicable fair employment laws, you have a duty to speak up. We encourage you to contact your supervisor, director of Global Compliance or the GIA Ethics Hotline to immediately report any suspected human rights violation.

### We Respect Each Other's Private Information

GIA collects and uses our personally identifiable information (PII) as employees of the Institute. This may include our name, date of birth, government-issued identification number, ethnicity, military status and other information (unless prohibited by law). PII may also include employee records, such as payroll, salary information, group insurance, benefits and working files. GIA uses this information for internal communications, human resources, security, finance, legal, compliance and audit purposes. As allowed by law, the information may be stored in a centralized database in the US or elsewhere, accessed by GIA around the world, and transferred to service providers that perform services for GIA (e.g. payroll, benefits).

As we work for GIA, we may have access to the information of our colleagues, students, clients and other constituents. This information should be accessed responsibly and always with a business need. The information should never be shared or accessible by others outside of GIA. It should

only be shared inside of GIA when a business need requires that we do so. Each GIA entity will provide additional information to employees about their rights and responsibilities with regard to PII. Please contact your HR representative or Corporate Counsel if you have any questions.

### We Respect Information Related to GIA

Throughout the course of our work for GIA, we may also have access to information related to GIA in our electronic files, paper files and elsewhere. Such information may include:

- GIA's operational plans, forecasts, financial results, and critical processes
- Government-issued identification numbers
- Strategic plans, company confidential information and other protected intellectual property
- Disputes
- Actual or suspected policy violations (which you are required to immediately report to GIA)
- Internal or external reviews, investigations and audits

This information should be accessed responsibly and only for GIA business reasons. It is only to be shared with others at GIA when there is a business reason to do so, and should never be shared outside of GIA, except as required by law.





# HONESTY & INTEGRITY FOR THE PUBLIC

## We Offer Quality Products and Unbiased Analysis

At GIA, we set a high standard for our educational programs and research. We conduct independent quality analysis, identification and grading services, and offer gemological instruments used by gem and jewelry professionals everywhere. It is crucial that we maintain this level of excellence and objectivity in our work. This means, in part, that we adhere to all quality controls and safety standards in place in the locations where we conduct GIA business. It also means we never allow our judgment to be clouded by personal bias.

If you encounter a situation in which you are unsure of the proper procedures, or are concerned that your objectivity may be compromised, you should report the issue to your supervisor or other member of management you trust, the director of Global Compliance, vice president of Human Resources, Corporate Counsel, or to the GIA Ethics Hotline.

## We Always Deal Fairly

Our Institute has a global reputation for honesty and integrity. To preserve this esteemed reputation, it is important that we

focus our attention on satisfying the needs of our constituents—never on limiting the competitive opportunities of other institutions.

Therefore, as GIA colleagues, we do not take unfair advantage of others through unethical dealing practices. This means that we never misrepresent the capabilities of our Institute or the features or availability of the products and services we offer. In addition, we never disparage companies in the same business, nor do we make untrue claims about their products or services. Instead, we maintain our integrity, and let our hard-earned reputation speak for itself.



## We Abide by Competition Laws

Anyone who uses our services has a right to access affordable, quality products and services. To protect this right, competition laws have been enacted in the countries where we do business. At GIA, it is our duty to know and follow such laws at all times.

As other laws that apply to our work, competition laws are often complex and can vary between locations. In general, such laws prohibit us from discussing any topics with others in the same business that may unfairly restrain trade, such as:

- Price-fixing
- Bid rigging
- Dividing or allocating markets, territories or clients

If an employee of another company attempts to discuss any of the above topics with you, stop the conversation immediately. Then, report the incident to your supervisor, Corporate Counsel or the GIA Ethics Hotline for further guidance. By even *appearing* to violate competition laws, we call our integrity into question and subject GIA and ourselves to severe consequences.

## We Respect Third-Party Information

Just as we respect the private information of our colleagues, we are committed to protecting the private information of our students, clients and vendors. This means we must safeguard the assets they entrust us with—including property and confidential information. At no time may we share this information with anyone—even with a GIA colleague—without a business need to do so.

In addition, it is our duty to respect third-party intellectual property rights. This means that, at GIA, we always uphold copyright, trade secret, patent and other intellectual property rights laws. To comply with such laws, we must never install or distribute software or fonts on Institute-owned computers without the appropriate license to do so. We also may not make unauthorized copies of any copyrighted materials.

For additional guidelines, please refer to your *GIA Employee Handbook, Work Rules and other company approved policies*.

# HONESTY & INTEGRITY FOR OUR ORGANIZATION

## We Work to Prevent Conflicts of Interest

As GIA colleagues, we understand the need to conduct our business and ourselves with utmost integrity. However, at times it can be difficult to do so when our personal interests interfere—or seem to interfere—with the interests of GIA. Such situations give rise to “conflicts of interest.” Conflicts of interest are common, and having one is not always a violation of our Code. However, failing to disclose an actual or potential conflict of interest is a violation. You have a duty to immediately disclose any such situation to your supervisor, the director of Global Compliance, vice president of Human Resources or Corporate Counsel.

### Gifts and Entertainment

GIA understands and appreciates the various gift-giving traditions in all of the countries and cultures where we work. Given the special nature of our work, however, we observe very strict gift-giving policies to avoid a conflict of interest, or even the appearance of one.

Under the very limited circumstances described below, managing directors and vice presidents *only* (or in rare instances GIA’s pre-approved designee, who is authorized

by the president and CEO) may give a gift to a business associate, provided all of the following conditions are met:

- The request form is submitted and pre-approved in writing by the president and CEO or the director of Global Compliance and retained in the records of the gift giver and Compliance
- The fair market value of the gift does not exceed USD \$200 for that business associate (including family members of persons affiliated with the business associate) in any calendar year
- The gift giver ensures that the gift recipient is not a government agency, a quasi-government agency, a government official or a quasi-government official and ensures that the gift will not be transferred for the benefit of any such entity or person
- The gift is professional, not personal, and is in keeping with customary business practices in the locale where it is given
- The gift is an acknowledgement of an existing business relationship, such as between GIA and a key business associate, such that the gift is an appropriate use of assets dedicated to GIA’s charitable purposes

## What to Do?

**Q:** Amy, a GIA instructor, is invited to dinner by Sunita, one of her best students, as a show of respect and gratitude. May Amy accept?

**A:** No, Amy should decline the invitation, explaining that GIA’s Code and policy prohibit her from accepting Sunita’s kind offer. We should always avoid situations that appear to show favoritism or create conflicts of interest.

## What to Do?

**Q:** Natasha, another GIA instructor discovers one morning that an envelope addressed to her has been left under the classroom door. Enclosed is \$100 and pearl earrings with no note. What should she do with them?

**A:** Natasha may simply disclose the gift in writing to the Compliance Department and submit the money and earrings to Human Resources. The earrings will be sold, such as in GIA’s silent auction, and the proceeds of the earrings sale and the \$100 will be used for a charitable purpose such as student scholarships. Since Natasha does not know who gave the gift, no further action is required.

- A representation is made to the recipient that the gift is from [GIA company name, e.g. GIA India, etc.] (it may also reference the vice president or managing director)
- The recipient’s Code of Conduct does not prohibit the acceptance of gifts
- The gift giver seeks reimbursement for the gift from GIA Accounting within 21 days (receipt required)

GIA’s policy is that neither GIA nor staff may receive gifts. In certain extremely limited circumstances, however, an exception may be made when a gift is disclosed, approved by the director of Global Compliance and all of the following apply:

- The gift is perishable (such as fruit or flowers) and worth under USD \$50 (or the local equivalent)
- It is the first gift received from this constituent or their family

- The gift must be disclosed in writing by the recipient to the Compliance Department within 3 days (disclosure forms are available from the Compliance Department)
- The gift must have all information identifying the constituent removed and be shared widely, such as in a lunchroom
- A letter must be sent to the gift giver within 5 days (letter template is available from the Compliance Department)

GIA’s president and CEO and/or the Board of Governors also have discretion to approve the receipt of a gift in certain extremely limited circumstances with disclosure.

If you have any questions, please contact your supervisor or the director of Global Compliance.

## Personal Relationships

It is important that we each conduct ourselves with professionalism and integrity in all that we do. Part of this ongoing commitment means we must be mindful of our personal relationships in the workplace. In addition to creating a conflict of interest situation, it is inappropriate and against GIA policy for management, instructors and certain staff to engage in romantic relationships with the GIA colleagues or students they directly oversee, or who are within their direct or indirect sphere of influence without prior written disclosure. Upon disclosure, in most cases GIA will change reporting relationships and establish other safeguards. For example, a GIA staff member in Student Records may not date a GIA student without submitting prior disclosure and seeking prior approval. Similarly, a GIA staff member in Student Financial Aid may not rent a room to a GIA student without doing the



same. This also applies to instructor-student relationships, as well as relationships between colleagues and GIA clients. Such relationships may give the appearance of favoritism or create problems in the workplace. As such, if you are involved in such a relationship or are considering becoming involved in one, you should immediately disclose this to the director of Global Compliance, vice president of Human Resources or Corporate Counsel. In addition, where pre-approved relationships exist, the senior-most employee in the relationship must recuse (disqualify) themselves from all employment-related decisions regarding this colleague or student. To further avoid the appearance of conflict of interest, the immediate superior who oversees a GIA employee in a relationship must consult with the vice president of Human Resources on any employment related decisions involving the less senior employee in that relationship.

Further, we may not directly or indirectly supervise, teach or have immediate family members or anyone with whom a personal relationship exists in your direct or indirect span of control. Doing so could also give rise to the appearance of favoritism. “Immediate family members” include spouses, children, stepchildren, parents, stepparents, siblings, in-laws and any other members of your household. If you find yourself in a position that violates this policy, disclose the situation immediately to the director of Global Compliance, vice president of Human Resources or Corporate Counsel.

## Corporate Opportunities

Through the nature of our work for GIA, we may have access to information about upcoming business opportunities. It is important that we never pursue opportunities that were discovered using GIA property or information, or through your position within our Institute, as doing so may create a conflict of interest. We owe a duty to the Institute to further its interests wherever possible. Therefore, we may not take for ourselves such opportunities, nor may we direct others to do so.

## Outside Employment

GIA respects that, at times, we may seek outside employment. However, in order to advance the Institute’s best interests, we must never accept outside employment that affects your ability to perform your GIA duties. This means that while employed at GIA you must never work on the side in the same business as GIA, or use GIA resources to advance your side businesses or for personal gain. This also means we may not accept employment with organizations that sell to or buy from the Institute. Questions should be directed to the director of Global Compliance, vice president of Human Resources or Corporate Counsel.

## What to Do?

**Q: Ratana and her husband first met at a jewelry show. She ran a bead stringing business at the time and he worked in his family’s diamond manufacturing business. When Ratana became a GIA Laboratory grader, she retired from bead stringing. Times are tough for Ratana’s family right now and she would like to work for her husband’s family on the side. She has no plans to use GIA property, resources or time and would only work for her husband’s family business on the weekend. Is Ratana allowed under the Code and policy to pursue this opportunity?**

A: Although her industry experience is a valuable asset, Ratana must not work for her family or for others in the same industry as GIA or its clients. Doing so would create a conflict of interest that would certainly violate our Code and policy.

Ratana may, however, begin stringing beads again, provided the beads do not include materials which GIA services (including pearls, semi-precious stones and diamonds) and provided she discloses her business relationships and interests in writing beforehand. Ratana may not disclose her GIA employment in any sales materials or verbally discuss her role with GIA while conducting her outside business. This will help to keep her relationship with GIA separate from her business. Should Ratana eventually decide to end her employment with our Institute and pursue her own business, she must not use any confidential information gained through her work for GIA.

## What to Do?

**Q: Ratana’s brother-in-law, who works for the family diamond business, asks Ratana if she will submit some of his diamonds to GIA’s laboratory for services. He also asks if Ratana will buy a small piece of equipment for him using her GIA affiliation to get a more favorable price. May Ratana do either of these things?**

A: No, Ratana must tell him that each of these actions would constitute a conflict of interest in which she would be taking advantage of her position at GIA for her family’s interests. We must always be careful to protect GIA’s reputation as an honest and trustworthy organization.

## Outside Financial Interests

Our outside financial interests are another area in which conflicts could arise. We may not own a substantial financial interest in any privately- or publicly-held organizations that do business with or are in the same industry as the Institute. This also applies to your immediate family members. If you or your immediate family member owns a substantial financial interest in any third party with whom we do business, you should immediately disclose the matter to your supervisor or the director of Global Compliance, vice president of Human Resources or Corporate Counsel.

## We Treat Institute Property with Care

Every day, our Institute provides us access to valuable physical assets that allow us to perform our work. Such assets include equipment, facilities, funds, software, documents and any other assets we may need to fulfill our job duties. It is important that we respect these assets, safeguarding them from theft, damage, loss and misuse. We must also use them professionally and appropriately at all times, never borrowing, loaning, selling or disposing of GIA property without specific authorization to do so. Keep in mind that there should be no expectation of privacy when using Institute equipment, since GIA may need to monitor these assets for a number of business reasons. If you have any

questions or concerns about our Code, seek guidance before making a decision. For additional guidelines, please refer to your *GIA Employee Handbook, Work Rules and other company approved policies*.

## We Keep Our Institute's Intellectual and Information Assets Secure

Just as we protect our Institute's physical assets from harm or misuse, we must also safeguard its information and intellectual assets, including confidential proprietary information. This includes the work performed in the course of our employment which is a work-for-hire belonging to GIA. "Confidential information" includes information identified or treated as confidential, proprietary or as a trade secret. Such information is generally not made available to the public. Some examples of confidential information include:

- Procedures used in the grading, analytical or research and development process
- Education materials
- Internal policies
- Digital assets
- Company specific processes and/or processes licensed for GIA use
- Internal telephone lists and directories
- Organizational charts
- Financial data
- Student examinations and their content or answers
- Data pertaining to actual or potential clients, colleagues, donors or students

## What to Do?

**Q: Pattama and Michael, colleagues in one of GIA's laboratory facilities, occasionally discuss their work while on breaks or when leaving the laboratory for lunch. Diamond clients occupy several of the suites in the building where they work, and are often present in elevators and common areas where Pattama and Michael choose to have work-related conversations. While the two colleagues are often mindful of surroundings, they occasionally discuss the grading process or results of laboratory reports, regardless of who else may be present. What should they do differently?**

**A:** Since Pattama and Michael do not have a business reason to be discussing GIA's operations inside or outside of the workplace, they must refrain from doing so. They must take great care to discuss GIA information *only* when there is a business need to do so and then *only* in places where they are not overheard. Since it can be quite difficult to ensure that others are not listening in, they should refrain from discussing anything that relates to GIA's operations and instead hold private conversations in the laboratory where no one without a business need to know the information may overhear. Conversations of a lighter nature, such as how busy they currently are at work (and no further details), are fine.

We may only share this and any other confidential information with our colleagues who have a GIA business need to know it. The information we use off-site on Institute laptops, iPhones, Blackberries, iPads and other electronic devices must be very carefully protected. Personally identifiable information (PII), including government-issued identification numbers, credit information, home addresses and telephone numbers, dates of birth, credit card numbers and employee records (such as payroll and salary information, group insurance, benefits and working files) may not be stored on computer desktops or other unsecured locations.

If you have any questions or concerns about our Code, seek guidance before making a decision. For additional guidelines, please refer to your *GIA Employee Handbook, Work Rules and other company approved policies*.



## We Make Proper Use of Our Institute's Electronic Communications Systems

As part of our commitment to respecting GIA property and information, it is crucial that we make proper use of our Institute's technologies. This includes our computer and network systems, software, Instant Messaging (IMs), mobile phones, tablets, email and storage media.

We are responsible for taking proper security precautions when using the Institute's network and computer systems. We must ensure that our PCs, laptops, mobile devices and workstations are properly secured, especially when unattended. Further, GIA's electronic communications systems may not be used for transmitting, retrieving, viewing, printing, or storing any communications of a discriminatory or harassing nature, or which are derogatory to any individual or group, which are obscene or sexually explicit, or are of a defamatory or threatening nature, are "chain letters," or for any other purpose that is illegal, against GIA policy, or contrary to GIA interests. In summary, our communication must be professional, courteous, and respectful.

While the electronic communications system is primarily for GIA's business use; limited, occasional, or incidental use of the electronic communications system (e.g. sending or

receiving e-mail) for personal, non-business purposes is permitted—as is the case with personal phone calls. However, we need to demonstrate a sense of responsibility and professionalism, and not abuse the privilege. Our personal use should be limited and not interfere with established work schedules.



### Social Media and Networking

Our Institute understands and embraces the new opportunities and information available to us through social media. Such media includes social networking sites, blogs, wikis, chat rooms and forums, and our involvement in them helps generate interest in our Institution. However, we must be sure to participate in such media responsibly. This means, in part, that we never create unnecessary risks to GIA's reputation or violate the standards set forth in our Code or policies. We may never disclose confidential or proprietary information through our use, nor may we defame, harass or harm GIA, our colleagues, clients, vendors or other constituents using such media. For additional information, please see our "Social Networking Guidelines."

## What to Do?

**Q: Marcus, a GIA instructor, is an active member of the online community. He has personal and professional profiles on numerous networking sites, often contributing to gem industry blogs and forums. Recently, on his personal Twitter account, Marcus published his opinion on the content of a student examination. Although this update was made to his personal account, his page includes links to Marcus's professional profile, which identifies him as a GIA employee. What should Marcus have done differently?**

**A:** While Marcus is certainly allowed to participate in social media on a personal and professional level, he must make sure his use is appropriate. Even if his personal and professional profiles are not closely linked, Marcus should not use his Twitter account to either disclose confidential GIA information or to use his GIA affiliation inappropriately.

## We Maintain Honest and Accurate Books and Records

Our financial statements provide a clear view of GIA's standing and help maintain the years of trust placed in our Institute. Therefore, we must each do our part to make certain that the Institute's financial documents, public and otherwise, disclose accurate and honest information. While it may not seem that the information we generate has an impact on our Institute's financial records, we each play a vital role in ensuring this important duty is fulfilled.

Therefore, every piece of data or information that we submit in GIA records—including personnel, time, expense and safety records—**must be entirely honest, accurate and complete.** We must follow GIA's system of internal controls and all applicable accounting requirements when recording this data. We also must submit appropriate contract documentation at all times.

Our commitment to conduct ourselves with integrity demands that we engage only in legitimate and authorized business

transactions. To do so, we may not be involved in any of the following activities:

- Making false representation of any sort, whether verbally or in writing
- Hiding GIA funds
- Mischaracterizing GIA transactions
- Creating undisclosed or unrecorded fund accounts
- Knowingly allowing similar illegal activities to occur
- Making false representation of any sort, whether verbally or in writing to the government (permit applications, visas, customs documents, other shipping forms, and other)

If you notice any accounting or auditing irregularities, or incidents of fraud by individuals responsible for our Institute's accounting or financial reporting, you should immediately report your observation to the director of Global Compliance, the director of Internal Audit, the CFO or Corporate Counsel.

### Document Retention

In order to properly maintain our Institute's records, we must know what to retain, and how and when to destroy these documents. GIA records can take many forms, including paper and electronic records, pictures, drawings, videotapes, photographs and emails. It is important that we follow the proper procedures in place in the locations where we work to identify, retain, store, protect, retrieve and dispose of GIA records. At the appropriate time, we have a responsibility to request destruction authorization from Corporate Counsel, and to destroy such records by incineration, shredding or electronic destruction.

### Investigations and Audits

There may be times that internal and external auditors and government investigators may ask us to participate in or provide information in connection with an audit or investigation of our Institute. If a government investigator contacts you and asks for information or documentation related to an investigation of our Institution, a GIA colleague or GIA consultant, you should notify GIA's Corporate Counsel or the director of Global Compliance *before* complying with the request. In addition, unless otherwise directed by a government authority, notify Corporate Counsel of all government-issued subpoenas.

Once the audit or investigation is underway, you are expected to fully cooperate with all such requests. This means, in part, that

you may only provide accurate, complete information. You may never attempt to influence any internal or external auditor or investigator who asks you for information or documentation. Do not provide misleading information, offer anything of value or tie incentives to the outcome of the audit or investigation. In addition, never encourage your fellow colleagues to exert this kind of improper influence.

If you are notified that documents in your possession are relevant to an anticipated or pending litigation, investigation or audit, you must follow the guidelines set forth in the notification. Do not conceal, alter or destroy any document covered by this notice, unless specifically instructed by Corporate Counsel that the hold on these documents has been lifted. If you believe that documents are being improperly concealed, altered or destroyed, you have a duty to report the situation to Corporate Counsel or to the GIA Ethics Hotline.

### We Do Not Trade on Inside Information

As a private, nonprofit organization, GIA colleagues cannot buy or sell our Institute's securities. However, we may possess inside information about other companies. "Inside information" is material, nonpublic information that would be considered important by a reasonable investor when making a decision to buy, hold or sell the securities of the company to which the

information relates. Inside information can be positive or negative in nature, and may include any of the following examples:

- Projections of future earnings or losses
- News of a proposed or pending merger
- Changes in executive management
- Significant new products or discoveries
- News of a significant sale of assets
- General business information—such as identifying a client who has submitted a large volume of stones

If, through the course of your work for GIA, you come across this type of information about a company with which we do business, you must not trade based on such information. In addition, you may not encourage anyone else to trade based on this information. If you have any questions regarding whether information you have access to is considered "inside," please contact Corporate Counsel as soon as possible.

### We Communicate Honestly and Accurately to the Public

At times, you may be approached by media representatives or analysts seeking information about GIA. Since our public image is crucial to our work, it is important that we know how to handle requests from such individuals. To ensure that GIA speaks with consistency and clarity, you should direct all inquiries to the Public Relations Department. Never discuss GIA matters with any media representatives or analysts without permission. Doing so may lead to the release of inaccurate information, which could impact upon our reputation for honesty and integrity.

### What to Do?

**Q:** Anil recently received an email from a local reporter regarding new gemstone enhancement processes. Anil isn't sure why this reporter is emailing him, and doesn't know how to respond. He's concerned that if he doesn't respond at all, the reporter may invent an untrue story that could negatively affect our Institute. Can Anil email the reporter back to give them what information he knows and believes he is able to share?

**A:** In this situation, it is best for Anil to simply forward the email on to the Public Relations Department. He should not attempt to provide any information to the reporter himself—even if he thinks he knows all the necessary information. Doing so could mean that incorrect or incomplete information gets released to the public, which would have negative consequences for our Institute and reputation.

# HONESTY & INTEGRITY FOR OUR GLOBAL COMMUNITIES

## We Comply with Anti-Corruption Laws Around the World

As a global institution, we must be mindful of the standards that apply to international work. Such standards require that we never engage in or otherwise promote corruption in the various locations where we do business. Worldwide laws have been enacted to ensure that GIA and other global organizations comply with the same standards. These laws, called anti-corruption laws, are designed to prevent bribery across the globe. We are required to understand and comply with all such laws, as they apply to the work we do for GIA.

GIA has a zero tolerance policy toward bribery. This means that we may never make, promise, offer or authorize the making of a bribe, kickback or other improper payment in connection with our Institute's business. A "bribe" generally includes anything of value, including cash payments, charitable donations, loans, travel expenses, gifts, meals, entertainment and any other payment, promise or other thing of value. A "kickback" is the return of a sum of money already paid or due to be paid as a reward for making or fostering business arrangements. Remember



that we may not engage any type of third party, including vendors, to make an improper payment on our behalf.

Anti-corruption laws specifically prohibit making, promising, offering or authorizing the making of any improper payment to a public official if the purpose or intent is to obtain an improper business advantage. "Public officials" generally include national or local government officers or employees, members of political parties, party officials, candidates for political office and employees of government-owned or controlled entities.

Anti-corruption laws also address facilitating payments. "Facilitating payments" are small, infrequent payments made to expedite the

performance of routine government actions by a public official. Routine actions are those that the official ordinarily performs and that our Institute is entitled to under the laws of that country. Examples include the issuance of work permits and visas. However, as these payments are prohibited in many countries and because of the legal and business issues they pose, GIA does not permit the use of facilitating payments in our operations. For more information, see our "Anti-Corruption Policy and Compliance Handbook".

## What to Do?

**Q: Linda, a GIA director, has been working with a public official in Hong Kong. In addition to seeking services from our Institute, the official is considering making a significant donation to GIA in exchange for admitting his daughter, and would like Linda to facilitate this arrangement. What should Linda do?**

**A:** Linda should immediately remove herself from the conversation, citing our Code and GIA policy, and immediately report the incident to the director of Global Compliance or Corporate Counsel. In addition to not soliciting donations, GIA does not promise or offer any favors to government officials or their families. By accepting a donation and promising admission to the official's daughter, Linda would be violating our gift policies and anti-corruption laws and she would be compromising GIA's good name.

## We Engage in Appropriate Charitable Activities

As a nonprofit institution, GIA does not make any contributions to political causes. As GIA colleagues, we may make personal contributions, but never on GIA's behalf. We may personally give to officially sanctioned GIA charitable campaigns occasionally held on campus. However, we have a strict non-solicitation policy, which means we may not promote an outside organization or cause in the workplace. Nor may we use GIA facilities, resources or funds in pursuit of a cause or engage in promoting outside causes on GIA time. You are encouraged to donate your own time and funds to the charitable or political causes of your choice, but be sure never to link your personal actions or contributions to GIA.



## We Respect Our Environment

At GIA, we value our environment, and actively seek to enrich our global communities. Therefore, we promote sustainable practices in all of our operations, whenever possible. Further, we constantly seek ways to perform our work in a safe, environmentally conscious manner. As part of our commitment to our global communities, we must each do our part to ensure that we reduce waste in our facilities and abide by safety standards set forth in the locations where we work. If you have any concerns about environmental safety hazards present in your workplace, contact the Global Safety Manager for guidance.

## We Uphold International Trade Controls

Another aspect of GIA's global work is our compliance with international trade controls. It is critical that we carefully comply with all applicable international trade laws and regulations at all times. We receive gemstones from around the world every day, and therefore must know and follow all laws relating to exports, re-exports or imports.

Some examples of export-controlled items include:

- Any technology, technical information, service or software that is disclosed or provided to a citizen of another country
- Any technical data relating to the design, production and use of GIA products and services
- Any GIA samples, laptops, schematics and product manuals
- Any GIA sales and marketing materials that are not already in the public domain

To be clear, an "export" occurs when a product, service, technology or piece of information is shipped to a person or company in another country. An export can also occur when technology, technical information or software is provided in any way (including verbally, in the case of

information) to a non-US citizen or company located in or outside of the United States. Before engaging in exporting activity, you must verify the eligibility of both the location of delivery and the recipient. You also must obtain all required licenses and permits, and pay all proper duties.

An "import" occurs when we bring goods we purchase from a foreign or external source into another country. Imports are generally subject to various laws and regulations. Specifically, this activity may require the payment of duties and taxes, as well as the submission of certain filings.

A "re-export" occurs when we export goods that have previously been imported from another country, and is also subject to international trade controls.



## Trade Sanctions

Economic sanctions imposed by the US, the United Nations (“UN”) and other allied countries, limit or prohibit transactions with sanctioned countries, entities or people in or from those countries. These limitations include: exports and imports (of goods, services and technology), payments, travel to the countries and other transactions.

Sanctions can apply to countries, regimes, specific entities or individuals; and they are imposed by the UN Security Council, the US Office of Foreign Assets Control (“OFAC”), and the European Union. Since OFAC sanctions apply to US and non-US GIA subsidiaries, we must know and follow the restrictions that apply everywhere we do business.

The US has broad sanctions against Cuba, Iran, Sudan, South Sudan, North Korea, Zimbabwe and Libya and limited restrictions against Burma and Syria. These apply in all of our global locations. It is important that



we stay updated on the list of sanctioned countries as these occasionally change. The US also maintains a list of entities and individuals that are specially designated for sanctions. At GIA, we have the ability to screen for these through our WorldCheck system.

Our policy is to fully comply with these requirements. All employees who screen or accept Laboratory client agreements, education applications and instrument orders must read and understand GIA’s “Guidance on US Government Sanctions.” Contact the director of Global Compliance or Corporate Counsel for the most current version.

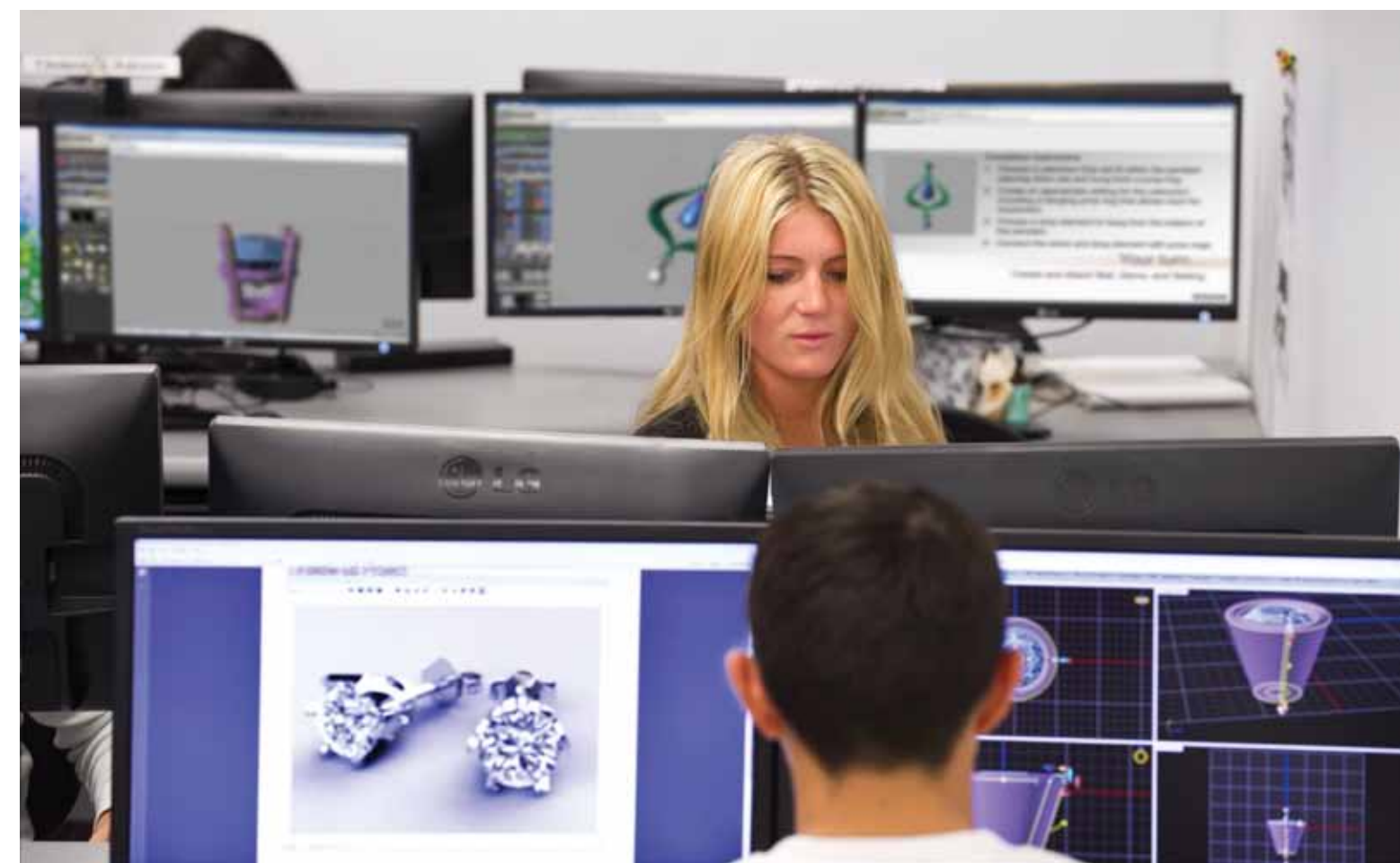
## Boycotts

Regardless of where we do business, we are strictly prohibited from participating in or cooperating with any international boycott unless it is approved by the US government. A “boycott” is a restrictive trade practice against conducting business with certain countries or individuals. Complying with boycotts that are not approved by the US government

is a violation of US anti-boycott laws and this Code. We must comply with US anti-boycott laws and regulations, as well as all other applicable laws. If you receive a boycott request orally or in writing through contracts or proposal materials or receive materials containing the words “boycott” or “blacklist,” note that US law prohibits this language and requires that you report it regardless of whether you agreed or responded to the request. You should also report the request to the director of Global Compliance or Corporate Counsel immediately, who is then responsible for reporting the incident to the US government.

## We Respect Human Rights Globally

GIA believes that all human beings are born free and equal in dignity and rights; and endowed with reason and conscience. We are committed to treating one another with respect and honor in our global internal and external communities.



# ACKNOWLEDGEMENT & CERTIFICATION

I hereby acknowledge receipt of the GIA Code of Conduct. I understand that my compliance with the Code and all relevant policies of the Institute is a condition of my continued employment with GIA. I understand that GIA expects the highest degree of professional ethics and integrity in connection with my employment. I acknowledge that it is impossible for GIA to identify and list every possible action that may violate this Code, and that GIA reserves the right to impose discipline for any conduct it deems inappropriate.

The Code does not constitute nor is it intended to constitute a contract of employment. Nothing in the Code is intended to alter GIA's policy of at-will employment or GIA's conformance with the employment laws of the countries in which it operates.

I have carefully read and I understand the foregoing Code. I support these professional standards for GIA, and for myself, and I will act in accordance with them. Throughout this document, I have been asked to disclose certain information in writing to my manager and the director of Global Compliance, vice president of Human Resources or Corporate Counsel, who will convey these disclosures, as warranted, to the appropriate GIA officer. Consistent with that requirement, I hereby state (Check one):

I have nothing to disclose.

I would like to make the following disclosures. (List and briefly explain below even if disclosed previously. Additional pages may be appended.)

I understand and agree that if, during the course of the year, additional or new circumstances arise that require disclosure, I will disclose such matters in writing to my manager and the director of Global Compliance, vice president of Human Resources or Corporate Counsel.

Print Name: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Title: \_\_\_\_\_

Department: \_\_\_\_\_

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London



Johannesburg



Hong Kong



New York



Mumbai



Dubai



**GIA**<sup>®</sup>

GIA (Gemological Institute of America)  
World Headquarters  
The Robert Mouawad Campus  
5345 Armada Drive  
Carlsbad, California 92008  
USA

Please note: Our Code of Conduct (“Code”) applies to all employees of the Gemological Institute of America, Inc. and its affiliates (collectively referred to as “GIA,” “our Institute,” or “the Institute”).

For questions or concerns, please contact:

- The director of Global Compliance:  
+ 760 603 4203
- The GIA Ethics Hotline: Call toll-free 866 295 2625 (US and Canada) to file a report. If you are calling to submit a report from outside of the US and Canada, please ask your local operator to place a collect call to the US phone number + 503 748 0577.
- Online at [www.ethicspoint.com](http://www.ethicspoint.com).