

DIA 9 BV

Annual Reporting on Responsible Sourcing and Due Diligence Mechanism

Doc. No. DV-ARN-001

	Name	Date
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Date:

[19/01/2024]

Reporting period:

[01/2023] to [12/2023]

OECD Due Diligence Guidance

Action taken

Step 1: Establish strong company management systems

1. A Adopt, and clearly communicate to suppliers and the public, a company policy for the supply chain of minerals originating from conflict-affected and high-risk areas.

Sourcing Policy has been established with document no. DV-POL-015.

Sourcing Policy communicated to internal interested parties through training and also displayed on notice board.

Sourcing Policy has been communicated to external interested parties through Email communications, and also displayed on notice board in office premises so that visitors can have access to it.

1. B Structure internal management systems to support supply chain due diligence.

The Company has prepared Manuals for Sourcing compliance and due diligence which includes procedure for risk assessment, methods for identification of red flags, risk mitigation etc.

Training on responsible sourcing has been imparted to relevant personnel.

The company has appointed senior official who bears the competence, knowledge and experience to be responsible for implementing due diligence management system.

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<p>1. C Establish a system of controls and transparency over the minerals supply chain.</p>	<p>The Company collects supplier details through KYC/KYS documents from each associated parties which include Business registration documents, Completed KYC questionnaire. Also checks against relevant government lists for individuals or organisations implicated in money laundering, fraud or involvement with prohibited organisations and/or those financing conflict.</p>
<p>1. D Strengthen company engagement with suppliers.</p>	<p>The company collects all information pertaining to physical description and origin of supplies from suppliers for each parcel through Invoice and sales documents and Gemmological laboratory reports and/or certificates (polished stones only).</p>
<p>1. E Establish a company-level, or industry wide, grievance mechanism as an early warning risk-awareness system.</p>	<p>The company has established supplier packet and shared with all the suppliers along with the company's requirement and obligations to comply with OECD requirements to make engagement with suppliers, the supplier packet which contains questions related to sourcing, their supplier due diligence mechanism etc.</p>
	<p>The company has established supplier's packet and shared with all the suppliers along with OECD requirements and its 5 steps of due diligence mechanism.</p>
	<p>The suppliers packet also contains agreement to take reasonable steps to ensure that all the supplies are supplied in accordance with Company's policy on supply chain/sourcing.</p>
	<p>The company has established this grievance procedure to hear concerns about circumstances in the supply chain involving supplies from conflict-affected and high-risk areas.</p>
	<p>The company shares email address on each invoices and also in supply chain/sourcing policy to contact to register grievance.</p>
	<p>The company also maintains grievance register to keep records on monthly basis.</p>

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Step 2: Identify and assess risk in the supply chain	
Identify and assess risks in the supply chain and assess risks of adverse impacts.	<p>The company has conducted risk assessment of all the suppliers based on information from supplier's packet, government assessments and from official websites.</p> <p>No any red flag identified nor any suppliers found from conflict affected high risk areas.</p>
Step 3: Design and implement a strategy to respond to identified risks (if applicable)	
Report findings of the supply chain risk assessment to the designated senior management of the company.	Director receives the findings of risk assessments.
Devise and adopt a risk management plan.	The company has established risk mitigation plan to respond to the risks and impacts if identified.
Implement the risk management plan and monitor performance of risk mitigation efforts.	The company has developed a Monitoring and evaluation plan to monitor and track the effectiveness of mitigation measures, including the results of follow-up activities after six months to evaluate significant and measurable improvement.
Internal training	The company has imparted trainings to all relevant employees in the month of June 2023 and in January 2024.
Communications	The company takes feedback from stakeholders if any risk identified and based on procedure to summaries the outcome of your engagement with relevant stakeholders
OPTIONAL INFORMATION ON Step 4: Carry out independent third-party audit	
Annual audit	The company has appointed an independent third party auditor Mr. Jatin Patel who conducted audit twice in a year and last audit conducted for the period of October-2023 to March-2024 and no any non-conformances identified.
Grievances and remediation	The company has not received any grievance in the assessment year.



RESPONSIBLE
JEWELLERY
COUNCIL

Name of Company: DIA 9 BV

Document Name: Policy Statement Supply Chain

Document Number: DV-POL-15

Date: 22/01/2024

Document Validity (YYY): For 2024-2025

Next Revision Date: 20/01/2025

Policy Statement Use of Supply Chain

The company shall complete the due diligence process prior to initiate business relationship. The company shall purchase/sale diamonds that are fully compliant with Kimberly Process Certification Scheme (KPCS).

The company shall ensure that all of its respective activities are in line with the OECD Due Diligence Guidelines, The Responsible Jewellery Council Standard and as per Universal Declaration on Human Rights laid down by United Nations.

The company shall prohibit any procurement from Conflict-Affected & High-Risk areas and adhere to compliance with standards on Anti-Money Laundering (AML) and Combatting the Financing of Terrorism (CFT).

Relevant Employees shall be trained on the Supply Chain & Due Diligence Requirement and OECD guideline at regular interval. We shall also provide support to our business partners and stakeholder for the same.

The company shall carry out risk assessment for its supply chain and shall not enter into any business relationship or if may require then shall suspend/discontinue the engagement with any such supplier involved in dealing with Conflict-Affected and High-Risk areas, Any form of Human Right Violation; Torture, Cruel, In-Human and Degrading Treatment; Forced/Compulsory Labour; Child Labour; Abuses such as widespread Sexual Violence; War Crimes; other serious violations of International Humanitarian Law, Crime against Humanity; Genocide and/or To Bribe or To be Bribed. We strictly condemn and prohibit any Direct/Indirect support to public/private security forces which illegally Control, Tax or Extort money from Mining Sites, Transportation Routes and Upstream Sectors.

The company shall verify counterparty details, including the Know Your Customer (KYC) for any precious metals supplying Counterparties at regular interval. The company shall carry out risk-based assessment, set appropriate verification control and monitoring of all such commercial activities and transactions.

The company shall assign responsibility of Supply Chain Integrity and due diligence compliance to senior personnel of the organization to prevent any risk of illegal activities or breach of it. The company shall implement the management strategy to respond to identified risks. For the same, Compliance Officer shall report to Senior Management in case of any such violation of this policy.

The company has established a risk assessment module and any business partners with high risk rating shall be red flagged and report to be submitted to senior management.

Grievance Mechanism

The purpose of this document is to outline a process through which any stakeholder can understand due diligence and supply chain integrity policy of the organization. The identity of the person who so ever has registered a concern shall be kept confidential and no retaliatory action shall be taken against any whistle blower. For anonymous submissions, you may refrain to provide your contact information.

Please share your Complaint/Grievance/Suggestion on info@dianine.com

