

**SIMONI GEMS BV**

**Annual Reporting on Responsible Sourcing and  
Due Diligence Mechanism**

**Doc. No. SGBV-ARN-001**

	Name	Date
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Approved By	Mr. Milan Shah	04/04/2025
Next Review Date	04/04/2026	

<b>Date:</b>	<b>[04/04/2025]</b>
<b>Reporting period:</b>	<b>[03/2024] to [04/2025]</b>
<b>OECD Due Diligence Guidance</b>	<b>Action taken</b>
<b><i>Step 1: Establish strong company management systems</i></b>	
<b>1.A</b> 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.	<p>Sourcing Policy has been established with document no. <b>SGBV-POL-015</b>.</p> <p>Sourcing Policy communicated to internal interested parties through training and also displayed on notice board.</p> <p>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.</p>
<b>1.B</b> Structure internal management systems to support supply chain due diligence.	<p>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.</p> <p>Training on responsible sourcing has been imparted to relevant personnel.</p> <p>The company has appointed senior official <b>Mr. Kalpesh Shah</b> who bears the competence, knowledge and experience to be responsible for implementing due diligence management system.</p>

<p><b>1.C</b> 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>The company collects all information pertaining to physical description and origin of supplies from suppliers for each parcel through Invoice and sales documents.</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><b>1.D</b> Strengthen company engagement with suppliers.</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><b>1.E</b> Establish a company-level, or industry wide, grievance mechanism as an early warning risk-awareness system.</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>

**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>
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**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 on regular intervals to evaluate significant and measurable improvement.
Internal training	The company has imparted trainings to all relevant employees in the month of August 2024 and February 2025.
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 <b>Ms. Jatin Patel</b> who conducted audit twice in a year and last audit conducted for the period of October -2024 to March -2025 and no any non-conformances identified.
Grievances and remediation	The company has not received any grievance in the assessment year.