



## ANNUAL OEDC COMPLIANCE REPORT

<b>Company Name:</b>	<i>Samir Gems Nv</i>
<b>Date:</b>	<i>19th of July 2021</i>
<b>Reporting period:</b>	<i>June 2020 to June 2021</i>
<b>OECD Due Diligence Guidance</b>	<b>Action taken</b>
<b>Step 1: Establish strong company management systems</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.	<ul style="list-style-type: none"> <li>- <i>We have published the policy on website for easy accesses to stake holder.</i></li> <li>- <i>OECD and Best Practice Annual communication has been sent to all the active customers and suppliers.</i></li> <li>- <i>Awareness presentation on Ethical sourcing based on OECD guidelines has been circulated.</i></li> </ul>
<b>1.B</b> Structure internal management systems to support supply chain due diligence.	<ul style="list-style-type: none"> <li>- <i>Additional responsibility has been assigned to Compliance officer to look over the compliance of Ethical sourcing policy.</i></li> <li>- <i>All key employees involved in sourcing and procurement have been trained.</i></li> <li>- <i>List of Suppliers has been maintained along with status of their social and ethical compliance.</i></li> <li>- <i>Ongoing monitoring of each supplies and associated suppliers is carried out with the help of tools such as digital media, web search, review of supply documents, declaration and market intelligence etc.</i></li> </ul>
<b>1.C</b> Establish a system of controls and transparency over the minerals supply chain.	<ul style="list-style-type: none"> <li>- <i>Supplier upstream information collection process started to obtain CAHRA's information and Ethical sourcing compliance at supplier level.</i></li> </ul>
<b>1.D</b> Strengthen company engagement with suppliers.	<ul style="list-style-type: none"> <li>- <i>Supplier questionnaire has been circulated and we are following up with them.</i></li> <li>- <i>We are also obtaining the vital information about suppliers from social platforms and social compliance registration such as RJC.</i></li> <li>- <i>We are compiling filled supplier questionnaire data, after analysis we will be formulate supplier engagement practices based on risk reported at each supplier level (if any)</i></li> </ul>
<b>1.E</b> Establish a company-level, or industry wide, grievance mechanism as an early warning risk-awareness system.	<ul style="list-style-type: none"> <li>- <i>We have established the grievance handling policy and procedure, contact details has been provided in our Social and Ethical policy on our website.</i></li> </ul>



# SAMIR GEMS N.V.

**ROUGH & POLISHED DIAMONDS**

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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.

- We have established the detailed policy and procedure for identification of risk.
- Compliance officer has been appointed to oversee the financial and ethical sourcing compliance.

## **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.

- Ongoing monitoring of each supplies is done by compliance officer to confirm its free from conflict, were required Red Flags are been raised for seeking additional information and closed after receiving such information to our satisfaction.
- Compliance officer shall report all un-answered flags to Managing Director.

Devise and adopt a risk management plan.

- Where information is half or not satisfactory, managment stars engagement practice, discussion and dialogue with suppliers is carried out to ensure full information in further business.
- Compliance officer carries out monitoring of each and every business transaction, Red Flags are being raised where required and further steps are followed as mentioned above.

Implement the risk management plan and monitor performance of risk mitigation efforts.

- Monitoring of Red Flags and its effective closure.
- Compliance officer provides period status reports of OECD compliance to the management.

Internal training

- Training is provided to all employees involved in buying, selling and compliance monitoring..

Communications

- Business principles has been circulated and published on the website.

## **OPTIONAL INFORMATION ON Step 4: Carry out independent third-party audit**

RJC COP audit

RJC audit was done one 28 June 2021 by Figurad

Grievances and remediation

No grievance of what so ever has been reported till date.