



## Annual Report – Supply Chain Management & Due-Diligence Efforts

<b>Company Name:</b>	<i>Diambel Group</i>
<b>Date:</b>	<i>01/07/2022</i>
<b>Reporting period:</b>	<i>JULY 2021 to JULY 2022</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.	<i>Diambel has established and implemented a strict supply chain policy stating all goods are bought from mines or sources that are not situated in areas of conflict and high risk of human rights violations.  The supply chain policy is endorsed at the highest levels of the Diambel Group and available to stakeholders at request. Diambel Group ensures relevant employees from the buying/selling team and admin team are aware of the policy and trained annually on sourcing and supply chain practices.</i>
<b>1.B</b> Structure internal management systems to support supply chain due diligence.	<i>Saloni Sanghvi, our existing RJC/BPP compliance officer is experienced and been assigned the role of supply chain manager. She is responsible for implementing all due diligence procedures, reviewing these practices, and monitoring all grievances.</i>
<b>1.C</b> Establish a system of controls and transparency over the minerals supply chain.	<i>Thorough checking of all invoices and supporting documents i.e. KYS and KP docs are carried out to identify any high risk suppliers and sources of your diamonds. This has strengthened our due-diligence efforts, and for record keeping.</i>
<b>1.D</b> Strengthen company engagement with suppliers.	<i>Correspondence letters have been sent to all suppliers regarding our supply chain procedures to strengthen engagement with them We have communicated our expectations and help suppliers to build capacity for due diligence. We have long-term relationships with our key suppliers, whom are all RJC/BPP certified.</i>
<b>1.E</b> Establish a company-level, or industry wide, grievance mechanism as an early warning risk-awareness system.	<i>A grievance procedure has been established, and available on request to all stakeholders. A grievance register is available to record any instances or breaches and maintained for a minimum of 5 years.</i>



**Step 2: Identify and assess risk in the supply chain**

Identify and assess risks in the supply chain and assess risks of adverse impacts.	<i>A risk assessment carried out has been used to assess the risks of our upstream suppliers (discovered during our due-diligence activities) however no actual or potential risks or impacts have been identified.</i>
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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.	<i>Mr. Paresh Sanghvi (Director/Shareholder) receives the findings of risk assessments directly from the supply chain manager.</i>
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Devise and adopt a risk management plan.	<i>In the instance where we find a reasonable risk that any upstream suppliers are committing abuses or are sourcing from, or linked to, any party committing these abuses, Diambel Group will terminate or suspend a supplier. Where necessary, Diambel Group will implement contractual provisions amongst its suppliers when up for renewal (i.e. sharing of due diligence information) and encourage suppliers to include provisions in their own contracts with their suppliers.</i>
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Implement the risk management plan and monitor performance of risk mitigation efforts.	<i>No mitigation measures have been needed to be taken yet, hence there are no follow-up activities to evaluate.</i>
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Internal training	<i>All relevant employees, dealing with diamonds, have been trained annually regarding our supply chain procedures and ensure it is implemented correctly.</i>
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Communications	<i>Our correspondence letter highlighting procedures and requirements regarding due-diligence practices is sent out to all suppliers. Our due-diligence activities and efforts are reported here and is available to all stakeholders on request.</i>
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**OPTIONAL INFORMATION ON Step 4: Carry out independent third-party audit**

RJC COP audit	<i>All supply chain activities were accessed during our RJC COP and BPP combined audit. Diambel Group has been awarded recertification till 2025.</i>
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Grievances and remediation	<i>No grievances have been received.</i>
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