

R. KOTHARI & CO

Annual Reporting on Responsible Sourcing and Due Diligence Mechanism

Doc. No.RKC-ARN-001

	Name	Designation- Department	Date
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Checked By	MR. DAKSH KOTHARI	PARTNER	10/04/2025
Approved By	MR. ANAND KOTHARI	PARTNER	10/04/2025
Next Review Date	10/04/2026		

Date:	[10/04/2025]
Reporting period:	[04/2024] to [03/2025]
OECD Due Diligence Guidance	Action taken
<i>Step 1: Establish strong company management systems</i>	
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.	<p>Sourcing Policy has been established with document no.RKC-POL-015.</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>
1.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 MS. SHRUTI RAWAL who bears the competence, knowledge and experience to be responsible for implementing due diligence management system.</p>

<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>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>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>1.D 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>

1.E Establish a company-level, or industry wide, grievance mechanism as an early warning risk-awareness system.	<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>
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.	Mr. Daksh Kothari (Partner) 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 March 25 and in September 24.
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 March 25 and in September 24.and no any non-conformances identified.
Grievances and remediation	The company has not received any grievance in the assessment year.

GRIEVANCE MECHANISM

R. KOTHARI & CO has established this grievance procedure to hear concerns about circumstances in the supply chain involving diamonds and minerals from conflict-affected and high-risk areas.

Ms. Shruti Rawal is responsible for implementing and reviewing this procedure.

Concerns can be raised by interested parties via email or telephone to:

Name	Shruti Rawal
Mobile phone	+91 9619854999
Email address	info@rkotharigroup.com

On receiving a complaint, we will aim to:

- Get an accurate report of the complaint.
- Explain our complaint procedure.
- Find out how the complainant would like it addressed/resolved.
- Assess the eligibility of the complaint and, where applicable, decide who should handle it internally. In cases where we are unable to address the complaint internally (e.g. where our company is too far removed from the origin of the issue raised in the complaint), we may redirect it to a more appropriate entity or institution, such as the relevant supplier or industry body.
- Where the issue can be handled internally, seek further information where possible and appropriate.
- Identify any actions we should take including hearing from all parties concerned, and monitoring the situation.
- Advise the complainant of our decisions or outcomes.
- Keep records on complaints received and the internal process followed, for at least five years.

Doc. No: RKC-POL-023

RJC Compliance Policy

The Responsible Jewellery Council (RJC) is a not for profit organization with the following mission:

“To advance responsible ethical, social and environmental practices, which respect human rights, throughout the diamond and gold Jewellery supply chain, from mine to retail”

RJC’s “Code of Practices” defines responsible ethical, human rights, social, and environmental practices, applicable to all RJC members.

R. Kothari & Co has become a member of RJC and is fully committed to the Code of Practices.

We strongly encourage all our business partners to follow and implement the various requirements of the RJC system. More information about the Program is available on the internet site <http://www.responsiblejewellery.com>.

We encourage your co-operation in adopting the standard and ensuring that the entire diamond industry is seen as a role model in setting high standards with respect to business, social and environmental responsibilities.

R. KOTHARI & CO
Date: 10/01/2025

R. KOTHARI & CO's Human Rights policy

- ❖ We, R. KOTHARI & CO, recognise our responsibility to respect human rights. We believe that our business has a role to play in protecting and promoting human rights.
- ❖ R. KOTHARI & CO is committed to respect internationally recognised human rights throughout our operations and supply chains. In line with the UN Guiding Principles on Business and Human Rights, our Policy is based upon the international standards enshrined in the Universal Declaration of Human Rights and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.
- ❖ Human rights refer to a set of basic rights and freedoms that belong to every person in the world, regardless of where they are from, what they believe or how they choose to live their life. It is a broad concept, with economic, social, cultural, political and civil dimensions. For R. KOTHARI & CO, respecting human rights means ensuring that any person involved in, or coming into contact with, our operations, supply chains and products is treated with dignity, respect, fairness and equality.
- ❖ Our Policy sets out overarching principles for how we conduct business at R. KOTHARI & CO, together with our employees and business partners, we are committed to drive forward the implementation of this Policy throughout our operations and supply chains. We recognise unique challenges to these standards may arise and we will work to address these challenges in partnership with relevant partners and stakeholders.
- ❖ ETI Base Code as reference as well as the RJC COPs related to labour rights, working conditions and health & safety.
 1. Employment is freely chosen
 2. Freedom of association
 3. Working conditions are safe and hygienic
 4. Child labour shall not be used
 5. Living wages are paid
 6. Working hours are not excessive
 7. No discrimination is practiced
 8. Regular employment is provided
 9. No harsh or inhumane treatment is allowed
- ❖ R. KOTHARI & CO, will continuously work to embed this Policy throughout the relevant processes and procedures of the company to ensure its effective implementation.
- ❖ We recognise that we must take steps to identify and address any actual or potential adverse impacts, whether they are directly or indirectly linked to our business activities or relationships.
- ❖ We understand that human rights due diligence is a dynamic, on-going process which requires acting on the findings, tracking our actions, and communicating to our stakeholders how we address impacts.
- ❖ As our human rights risks and impacts may vary over time, this policy will be subject to review if proven inadequate by our human rights due diligence process.

R. KOTHARI & CO

DATE: 10/01/2025

Doc. No: RKC-POL-015

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, 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 Combating 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@rkotharigroup.com

R. KOTHARI & CO
Date: 10/01/2025