



RJC COP -2019

ANNUAL

REPORTING

FY 2023-24

ACHAL JEWELS PVT. LTD.
G-43, EPIP, SITAPURA INDUSTRIAL AREA,
TONK ROAD, JAIPUR-302022



ABOUT THIS REPORT

This report is designed to fulfil all reporting requirements for non-mining RJC members. **Achal Jewels Pvt. Ltd.** is a gold & silver jewellery manufacturer.

Contact Information

COMPANY NAME: [Achal Jewels Pvt. Ltd.]

DATE: [02/04/2024]

REPORTING PERIOD: [FY 23-24]

CONTACT: [Arihant Bhansali]

STEP 1: ESTABLISH STRONG COMPANY MANAGEMENT SYSTEMS

Achal Jewels Pvt. Ltd. has the following polic(y/ies) [supply chain policy, human rights policy,RJC Policy] in place with regard to our supply chain on the following minerals gold & silver originating from Non-conflict-affected and No high-risk areas. These policies are communicated to our interested parties and can be accessed via www.derewala.com

To support supply chain due diligence, we have implemented the following internal measures KYC for each suppliers & customers. The senior manager is responsible for overseeing supply chain due diligence. Mrs. Geetanjali Singh is responsible to oversee this due diligence.

Achal Jewels Pvt. Ltd. has established a system of controls and transparency over our supply chain; which include, our approach for identifying suppliers and identifying sources of our materials/products. These methods have strengthened our due diligence efforts by [Know your counterpart].

As a company we communicate our expectations regarding supply chain due diligence via mail or by post. In addition to this we also take the following steps to strengthen our engagement with suppliers; i.e. supplier communication, supplier audit, discuss about due diligence requirements & trainings. We have communicated our policies to all supply chain suppliers who involved in supply of Gold, Silver & Diamond & Gemstones.

Our grievance mechanism for internal stakeholders can be accessed by Written policy on Company's Notice Board. , our external grievance mechanism is available via email :-

arihant@achaljewels.com

Mr. Ariahnt Bhansali (Compliance Officer) is responsible for these grievance mechanism.

STEP 2: IDENTIFY AND ASSESS RISK IN THE SUPPLY CHAIN

We assess our supplier's due diligence practices by Know your counterpart /KYC Form, on line verification on government sites, personal discussion & annual evaluation.

During our assessment of our supplier's due diligence practices, we identified the below potential and actual risks within our supply chain. We have identified a



potential risk related to [detail where in your supply chain (e.g. supplier) including country.

STEP 3: DESIGN AND IMPLEMENT A STRATEGY TO RESPOND TO IDENTIFIED RISKS (if applicable)

The senior manager who receives the findings our risk assessment is Subhash gaud, Deputy HR Manager.

To respond to the risks identified within our supply chain, we took the following steps to design and implement a risk management plan (Risk Assessment & Control mechanism).

Achal Jewels Pvt. Ltd. provided the training regarding our due diligence activities to our [employees and/or contractors] according to annual training plan; this training included information on our supply chain & due diligence policy, human right policy, anti money laundering policy. We have also provided training regarding our due diligence activities to all of our employees according to annual training plan; this training included information on [give a brief summary of the training provided, this can include the audience, frequency of training and topics covered].

Achal Jewels Pvt. Ltd. communicate to our stakeholders regarding our due diligence activities. This communication is in the form of KYC form, Communication Letter etc.

Since our last report has no grievances have been raised.

CARRY OUT A THIRD PARTY AUDIT (OPTIONAL INFORMATION)

Achal Jewels Pvt. Ltd. has joined the RJC COP 2019 in 2021 and has achieved the certificate no. **0000 3837** for three year certifications. This certificate is valid from 20/01/2022 to 20/01/2025.

In support of our continuous improvement journey, our latest third-party RJC audit will take place within our organisation against the RJC COP 2019.

ANTI MONEY LAUNDERING /ANTI BRIBERY POLICY

Achal Jewels Pvt. Ltd. has detail policy about anti money laundering & anti bribery policy. We never support such kind of activities. Achal Jewels Pvt. Ltd. also requested to supply chain partners to follow & implement in their business activities.

SUPPLIER RISK ASSESSMENT /DUE DILIGENCE REPORT

Risk Assessment - Report Summary

The compliance officer of the company has carried out risk assessment in context of OECD guidelines and for all its suppliers. The company has made aware all its suppliers aware of ethical supply chain practice and OECD requirements. Upon verification of information provided by all our suppliers and information available in public domain, we have verified the existence of risk of violation of OECD guideline. We found all our suppliers are involved with legitimate business



practices not involved with any activity that violates OECD requirements. A detailed report for all suppliers have been available from the senior management of the company.

Sr#	Description	Information
1.	% of legitimate register company supplying material	100% Gold, Silver , Diamond suppliers are purchasing from legitimate area & they are registered company.
2.	Has company done any sales and purchase with any illegitimate company in last assessment period?	No. The company deals with only legitimate business partners complying with law of land.
3.	Any Supplier found violating any OECD requirements on due diligence and risk assessment?	No. All suppliers found compliance and low risk suppliers
4.	Any supplier involved with any armed forces or human right violation?	Not observed during due diligence
5.	Is any individuals or company blacklisted by SDN list of USA Treasury or EU sanctions?	No. No such red flag observed
6.	Any suppliers found violation ethical business and sourcing policy?	No
7.	Have you identified any suppliers involved in dealing with conflict minerals and metals?	Nil suppliers involved in dealing with conflict minerals and metals.
8.	Any area or location or individual or company related red-flag observed?	No
9.	Overall risk of Suppliers	Upon Due diligence/risk assessment, all suppliers found low risk.
10.	Overall business relationship with suppliers & customers	Very good relationship with supplier & customers. Nil discrepancies found during due diligence



HUMAN RIGHTS DUE DILIGENCE REPORT FY 23-24

Sr#	Description	Information
1.	General employment terms	<p>Employment terms & conditions are compliant with National & state law. Wages are more than minimum wages declared by State Government .</p> <p>Nil discrepancies found during this FY 23-24</p>
2.	Working hours	<p>Normal working hours are not exceeding 48 hours in a week. Overtime is voluntary. Sunday is Holiday for all workers.</p> <p>Nil discrepancies found during this FY 23-24</p>
3.	Remuneration	<p>Company is providing wages more than minimum wages regulations. Payment provided to all employees through bank & it is on monthly basis.</p> <p>Nil discrepancies found during this FY 23-24</p>
4.	Harassment, discipline, grievance procedures and non-retaliation	<p>All forms of violence and harassment in the workplace are prohibited in our company. All employees are treated with dignity and respect. Disciplinary process and related standards on appropriate disciplinary procedures are actively communicate to the employee treatment, and apply these equally to all management and staff.</p> <p>Nil discrepancies found during this FY 23-24</p>
5.	Child labour	<p>Company have child labour policy. Nil child labour employed in company.</p> <p>Nil discrepancies found during this FY 23-24</p>
6.	Forced labour	<p>We are not engage in or support the use of forced labour, including bonded, indentured or involuntary prison labour as defined in ILO Convention 29.</p> <p>Nil discrepancies found during this FY 23-24</p>
7.	Freedom of association and collective bargaining	<p>We are respect the right of employees to associate freely in workers' organizations of their choice, without interference or negative consequences.</p> <p>Nil discrepancies found during this FY 23-24</p>



8.	Non-discrimination	<p>We are not practicing or condone any form of discrimination in the workplace in terms of hiring, continued employment, remuneration, overtime, access to training, professional development, promotion, termination or retirement.</p> <p>Nil discrepancies found during this FY 23-24</p>
----	---------------------------	--