

OECD STEP 5 ANNUAL REPORTING

Company Name :	Star Gems Group
Report Date:	10th August 2021
Reporting Period:	January to December 2020
OECD DUE DILIGENCE GUIDANCE	ACTION TAKEN
Step. 1. Establishing Strong Company Management Systems	
1.A Adopt and clearly communicate to suppliers and the public company policy for the supply chain of mineral originated from conflict affected and high-risk areas.	<p>Star Gems Group has established its sourcing policy, which has been documented and published as on 15th March,2021 on the website of the company under Tab of Social compliance.</p> <p>Best Endower communication has been sent to all upstream supply chain partners and their commitments are obtained.</p>
1. B Structure internal management system to support supply chain due diligence	<p>Star Gems Group has established strong internal risk assessment to ensure that all its supplies are conflict free and ethically sourced.</p> <p>Company has carried out countrywide risk assessment and supplier wise risk assessment in accordance with the OECD requirements</p>
1.C. Establishing system of controls and transparency over the minerals supply chain.	Suppliers are requested to share the information, which is analyzed to identify potential risk of CAHRA” s if any.
1.D. Stringent Company Engagement with Suppliers	Regular communication and awareness are carried out with suppliers (upstream suppliers). Ongoing monitoring is carried and two-way communications are carried out to strengthen the supply chain.
1.E. Establishing company-level or industry wide grievance mechanism	Grievance mechanism has been establishing and published on the web site of the company under Tab

as an early warning risk-awareness system.	of Social compliance .
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Step. 2. Identify And Asses The Risk In The Supply Chain

2. Identify and assess the risks in the supply chain and asses risk of adverse impact	Company has established strong ongoing monitoring system for each and every transactions and annual review of declaration and information exchanged are carried out. Ongoing Due Diligence for KYC and other supply chain information is carried out.
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Step. 3. Identify And Asses The Risk In The Supply Chain

3.1. Report findings of the supply chain risk assessment to the designated senior management of the company	Compliance officer shall review all the transactions and were queries are raised or Red Flags are raised.
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3.2 Device and adopt risk management plan	Compliance officer shall seek the additional information and after its review further decision of raising CAHRA's shall be issued.
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3.3. Implement the risk management plan and monitor the performance ofthe risk mitigation efforts.	Compliance officer shall monitor the effectiveness Mitigation actions taken and revised status of the associate risk if any.
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3.4 Internal Training	Regular trainings are carried out among all the affected employees.
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3.5 Communication	Periodic communications are sent across the supply chain for increasing awareness about Ethical sourcing as per OECD regulations.
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Step. 4. Optional information on Step 4

4.1 RJC COP Audit done on & Done By	SGS conducted audit at South Africa Entity as a part of De Beers BPP program and during the audit Group
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STARGEMS

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	OECD Sourcing compliance was verify and no negative comments or point of improvement has been raised during the audit.
4.2 Grievance and recommendation	No grievance has been reported during the calendar year 2020.