



JEWEL STAR DIAMOND CO. LTD

322/11 E, Bangkok Gems & Jewelry Tower, 10th floor, Suriyawong Road,
Bangrak, Bangkok, Thailand 10500

Contact no.: +662 1266789 | Email id.: jewelstardiam@gmail.com

Code of Practice - Responsible Jewellery Council

Jewel Star Diamond Co.,Ltd. Guidelines

Jewel Star Diamond Co.,Ltd. is a Thailand based diamond distributor and exporter. We recognize the importance of being a social responsible jewellery exporter and has therefore agreed to conduct the practice code complying with the following guidelines of the Responsible Jewellery Council:

1. The executives will provide a demonstrated system that maintains awareness and ensures compliance according to relevant laws and/or responsibilities in relation to the Code of Practices - Responsible Jewellery Council (COP-RJC) guidelines for society.
2. The company will prepare all the written policies in compliance with the requirement of Responsible Jewellery Council (RJC) with endorsement by top management and implement all those practices among the policies within this manual, while also assigning the responsible person for implementation on such policies.
3. Provide the management system for all policies that have been announced as follows. This will have an identification and assessment of all risks within the implemented policies and establish due diligence procedures to ensure effective implementation of requirements. In this regard, communication is provided to employees and stakeholders directly informed and published to the public.
4. The company has to conducted a review at least once a year to assess the appropriateness, adequate, and sustainable of existing practices, while also taking steps to resolve any gaps to succeed in accordance with the policy.
5. Report the results of the above compliance at least once a year by communicating to the public and directly to stakeholders on regular basis.

The above guidelines will be adopted in the operation accordance with the company's policy announcement as follows:-

Responsible Supply Chain Policy

1. Jewel Star Diamond Co.,Ltd. is a Trader and Exporter of diamonds. This policy confirms Jewel Star Diamond's commitment to respect human rights, avoid contributing to the finance of conflict and comply with all relevant UN sanctions, resolutions and laws.





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2. Jewel Star Diamond Co., Ltd. is a member of the Responsible Jewellery Council (RJC).

As such, we commit to proving, through independent third-party verification, that we:

a. respect human rights according to the Universal Declaration of Human Rights and International Labour Organization Fundamental Rights at Work;

b. do not engage in or tolerate bribery, corruption, money laundering or finance of terrorism;

c. support transparency of government payments and rights-compatible security forces in the extractives industry;

d. do not provide direct or indirect support to illegal armed groups; and

e. enable stakeholders to voice concerns about the jewellery supply chain.

f. are implementing the OECD 5-Step framework as a management process for risk based due diligence for responsible supply chains of minerals from conflict-affected and high-risk areas.

3. We also commit to using our influence to prevent abuses by others. However, we will consider the potential of risks from non-compliance with the supplier's requirements with red flags. The supplier will be informed to take steps to reduce the existing risks as well as terminate business transactions Remedies to the effects that occur as well. This will do by the collected information through our grievance mechanism from stakeholders regarding materials procured from high-risk conflict areas.

4. Regarding serious abuses associated with the extraction, transport or trade of Silvers/coloured gemstones

We will neither tolerate nor profit from, contribute to, assist or facilitate the commission of:

a. torture, cruel, inhuman and degrading treatment;

b. forced or compulsory labour;

c. the worst forms of child labour;

d. human rights violations and abuses; or





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e. war crimes, violations of international humanitarian law, crimes against humanity or genocide.

5. We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are committing abuses described in 4 or are sourcing from, or linked to, any party committing these abuses

6. Regarding direct or indirect support to non-state armed groups

We will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring Silvers or coloured gemstones from, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates who illegally:

a. control mine sites, transportation routes, points where Silvers / coloured gemstones are traded and upstream actors in the supply chain; or

b. tax or extort money or Silvers /coloured gemstones at mine sites, along transportation routes or at points where Silvers/coloured gemstones are traded, or from intermediaries, export companies or international traders.

7. We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are sourcing from, or are linked to, any party providing direct or indirect support to non-state armed groups as described in paragraph 6.

8. Regarding public or private security forces

We affirm that the role of public or private security forces is to provide security to workers, facilities, equipment and property in accordance with the rule of law, including law that guarantees human rights. We will not provide direct or indirect support to public or private security forces that commit abuses described in paragraph 4 or that act illegally as described in paragraph 6.

9.Regarding bribery and fraudulent misrepresentation of the origin of Silvers/coloured gemstones

We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of Silvers/coloured gemstones, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of Silvers/coloured gemstones





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10.Regarding money laundering

We will support and contribute to efforts to eliminate money laundering where we identify a reasonable risk resulting from, or connected to, the extraction, trade, handling, transport or export of diamond.

Human Rights Policy

Jewel Star Diamond Company Limited is committed to strictly adhering to international human rights principles. This is a code of conduct for sustainable business operations by considered as in every part of business operations. Therefore, a human rights policy has been established for employees, executives, and other stakeholders. Adhere to the following practices:

1. Jewel Star Diamond Co., Ltd. will conduct the business by paying attention and respect to the law. Employees and executives must strictly comply with relevant laws.
2. Jewel Star Diamond Co., Ltd will value and respect human rights according to the Universal Declaration of Human Rights and International Labour Organization Fundamental Rights at Work;
3. We will not support and avoid human rights violations against others and will resolve any issues or impacts related to human rights consequences.
4. We will seek to prevent or mitigate in related human rights consequences.
5. We will provide a process that represents due diligence process of identification, prevention, relief issues, and impact on Human Rights.
6. We will be involved in considering the impact on Human Rights and rehabilitation through the legal process.

Due Diligence on Minerals Sourcing from Conflict- affected or High Risk Area.

1. The company will provide various policies to demonstrate responsibility in the mineral supply chain in order to comply with the OECD guidance (Organization for Economic and Cooperation Development), which consists of human rights policy, non-forced labour, non-worst forms of child labour, non-violence, abuse or immoral conduct, non-support of terrorism, unlawful treatment of individuals security, non-support money laundering, giving or accepting bribes or not paying taxes, against all kinds of crimes against humanity.

2. Provide risk identification and assessment in clause 1 above for the source of raw materials and high-risk areas according to the OECD criteria. Red-flag will be rise up in case of need mitigation.





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3. Provide procedures for mitigation of risk and/or improvement or development to reduce risk and consider the operation. This include action to control of risk.
4. Provide the audit in identify point by third-party auditor.
5. Provide reports and reviews in every year as well as communication to all stakeholders.

Anti-corruption, Bribery and Facilities Payment Policies

1. The company defines the meaning of corruption which is to give in any kinds of bribery by proposing, pledges, acceptances, induced to illegal acts in giving, pledge, claim, or accept any money, property or other improper benefits directly or indirectly, for a person to act or refrain to perform duties, which is to acquire or maintain business or recommend business to the Company, or to obtain or maintain any benefits that improper for business.

2. The company and all employees will conduct their business with honesty, integrity, transparency, and will not involve with any kinds of corruption; neither direct or indirect.

3. The company and all employees will not be neglected or ignored when an action that is deemed to be a corruption act has been found. The executives or the person who is in charge must be informed.

4. The company and all employees will not accept or pay gifts or other endorsements from any individual who conducts business with the company beyond necessity. Receiving gifts must not exceed the value of the stipulated traditional occasion, and must be noted and report to the executive.

5. The company will establish a Whistle-Blowing Service channel for offences or complaints while encouraging employees and stakeholders to monitor. If any employee or stakeholder finds any action that misleads from the good governance principle, ethics, company regulations, illegal actions, and activities that violate the rights of stakeholders or may cause damage to the company, employees or stakeholders can report any wrongdoing, violation of rights of stakeholders, or any things that may cause damage to the company in such channels.

6. The company shall provide fairness and protection to any employee or whistle-blower who has reported or provided evidence in corruption related to the company, including employees who refuse fraudulent conduct, without reducing position, punishment, or negative consequences even if the company loses its business opportunity. The company will provide care and protection to the whistle-blower or an appropriate cooperate on the reporting of corruption.

7. The company will keep the complaint or the information involved with the complaint confidentially and will not disclosed it to other persons unless it is necessary in order to operate accordance to the regulations or in accordance to the law. If the information is disclosed, the company will take disciplinary action and/or acts in the law as the case may be.





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8. In case of sufficient evidence that the complainant has behaved dishonestly or accused the alleged offender, the company will take action to protect the reputation of the alleged offender by considering disciplinary action, or if the complainant is a third party and the company is damaged, the company may continue to take legal action.

Policies on Anti-money Laundering or Financial Terrorism.

1. The company is committed to protect itself from being a part of the money laundering or financial terrorism support.

2. The company will document and apply the Know Your Counterparty (KYC) policy and procedures for business partners who are suppliers and customers with respect to diamond. Policies and procedures will :

(a) Identify of counter party by checking government-issued identification. Where triggered by a risk assessment or applicable law, establish the beneficial ownership and principals of the counterparty.

(b) Review and verify that the counterparty, and if applicable, their beneficial owners are not named on relevant government lists for individuals or organizations implicated in money laundering, fraud or involvement with prohibited organizations and/or those financing conflict.

(c) Maintain an understanding of the nature and legitimacy of their business.

(d) Monitor transactions for unusual or suspicious activity and report suspicions of money laundering or finance of terrorism to the relevant authority as applicable.

(e) Maintain adequate records for either five years minimum or as long as required by national legislation, whichever is longer.

3. The company shall nominate an individual to be responsible for implementing the KYC policy and procedures.

4. The KYC's policies and procedures will be up to date and appropriate, including training procedures of documentation and regular reviews as usual.

5. The company will record all cash transactions or obvious links or cash-like transactions equal to or greater than 10,000 EUR/USD or the criteria set by applicable law (whichever is lower) as required by law. Members must report such transactions to the relevant assigned authorities.

Security Policy

1. The company will assess the security risks and set up the standards to protect employees, contractors, visitors, and employees employed by related business partners, for stealing the product, damage or replacement of the product in the workplace or during exhibitions and delivery.





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2. The company will ensure that all security personnel respect the human rights and dignity of everyone and will strictly use force only as necessary and at the minimum against threats.

Labour Management Policy

The company defines labour management policies by setting out the details in the Company's Working Regulations.

1. The company will provide employment conditions relating to wages, working hours and others by defining in the working regulations, and inform to employees.

2. The company will not avoid complying with labour and social security laws.

3. The company will keep appropriate employees records, including payment, total wages, working hours, overtime hours.

4. The company will comply with labour law by requiring employees to have a normal working time of not more than 48 hours a week.

5. Overtime may occur with the consent of an employee under the labour law and will not be enforced, threatened to terminate or be forced to accept or quarantine or punishment for not working overtime.

6. The total number of hours of work and overtime will not be over 60 hours per week, unless there is an agreement together or in exceptional circumstances such as peak production period or during an accident or emergency, which must be given the consent of the employee and appropriate equipment is required to protect the health and safety of the employee.

7. The company will arrange a weekly rest day at least 1 day per week, as defined in the working regulations.

8. The company will arrange for traditional holidays and leaves, including maternity leaves, annual holidays, which will be paid according to the law, as defined in the working regulations.

9. The company will arrange annual holidays in accordance with the labor law which will be paid.

10. The company will pay the employee not less than the minimum wage rate as required by law.

11. Overtime pay arrangement will not be less than as required by law.

12. The company will arrange payment according to the methods and periods set forth in the Work Regulations.

13. The company will not deduct employee wages unless it is permitted by law.

14. The company will not force employees to purchase food or other services from the facilities provided to employees without choice.

15. The company will not pay advance wages, and the payment is subject to the law.





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16. All kinds of violence and harassment in the workplace are prohibited, including no physical punishment. Acts of vilification or shame, sexual harassment, physical abuse, psychological abuse, verbal or sexual discrimination, interaction and intimidation, whether direct or indirect in any form are prohibited in the workplace. Employees must be treated with respect, honor, not under threat or violence or threaten against employees, family or colleagues.

17. The communication of the disciplinary process, disciplinary procedures, and the equal treatment of employees, which is defined in the working regulations, have to be informed to the employee.

Policy of Worst Form of Child Labour.

1. The company will not participate in or support child labour as set out in the ILO Convention, the 138th meeting and recommendation 146, which imposes a minimum age for basic work at 15 years old, so that children can complete compulsory studies.

2. The company will not participate in or support child labour in the worst form as defined in the International Labor Organization Convention, the 182nd meeting and recommendations from the 190th meeting, which includes:

1) The use of child labor in harmful ways by its nature or circumstances which is likely to be harmful to health, safety, or morality in people younger than 18 years old.

2) All forms of child slavery and practices similar to slavery, including debt, child trafficking, forced child labor, and the use of children in combat.

3. If any place of child labor is found, the company will document the use of child labor and provide a healing process that includes the ongoing welfare process of the child, and consider family status and rehabilitation, including the withdrawal of children participating in child labor, and in case of the child is subject to compulsory education or attends school, adequate support must be provided until compulsory graduation.

Non-Forced Labour Policy

1. The company will not participate in or support forced labor, including binding, bonded, or involuntary labor, as defined in the 29th meeting of the International Labor Organization Convention.

2. The company will ensure that all employees work in voluntary situations, by:

1) Not limiting the freedom to move or the movement of employees in the workplace in an inappropriate area.

2) Not confiscating or hold employee's documents, such as ID card, work permit.





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Safety & Occupational Health Policy

1. The company will provide safe and healthy working conditions for all employees in accordance with applicable laws and other relevant industry standards.

2. The company will also provide and maintain the workplace and accommodation in the relevant premises.

2.1 Safe and accessible drinking water.

2.2 Hygiene facilities for eating and storing food.

2.3 The cleaning facilities and clean toilets correspond to the number and gender of the employee.

2.4 Fire safety equipment and alarms.

2.5 Clearly unlock mark, unlock emergency exits and escape routes.

2.6 Access to enough power supply and emergency light.

2.7 Suitable conditions for pregnant women or nurses or alternative work arrangements to avoid improper workplaces.

3. The company must assess the risk of harm in the workplace and take control to reduce the risk of accidents and injury to employees. Risk assessment scrutinizes the dangers associated with the activities and products of members, including the use of machines and mobile devices, in the case of involving the storage and management of chemicals, consisting of cleaning materials, excessive exposure to smoke, air borne particles, noise levels, and temperature and/or lighting and insufficient ventilation, residues from repetitive activities, considerations for workers under the age of 18 and pregnant women, and general hygiene and housekeeping issues.

4. The company will arrange the Health and Safety Cooperation Board to pick up and discuss about health and safety issues with management.

5. The company will provide training and information about health and safety to employees in the ways and languages that they can understand. It includes training and information about:

5.1 Determining various roles related to health and safety hazards and procedures for specific controls.

5.2 Appropriate action, in case of an accident or emergency.

5.3 Fire and emergency safety procedures.

5.4 First Aid Training for assigned employee representatives.

5.5 The rights and responsibilities of workers to strike, or refuse to work in situations where there are uncontrollable hazards, and demonstrate these situations immediately to those who are near risk and to the management authority.

6. The company will provide appropriate personal protective equipment (PPE) for free of charge and ready to wear, or appropriate caution.





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Announcement Management representative in implement COP-RJC

According to Jewel Star Diamond Co., Ltd. has a responsible enterprises policy, so that there are personnel who have responsible for preparing procedures that must be implemented and monitored (Due Diligence) RJC to ensure consistency in system preparation. The person with the following :-

Mr. Tejas Shah

Person whom assigned above having the functions following :

1. Contact partners for achieve an active cooperation in the preparation of the system in order to understand the preparation of various procedures for responsibility in the supply chain, to ensure transparency and controllable.
2. Identify and assess the risk of the accountability system in the supply chain system.
3. Design and place responsive strategies in the supply chain system.
4. The review was conducted by an independent third party for the process of practices that indicate that risk is in order to achieve transparency.
5. The report follows the procedure stipulated in entrepreneurship practices responsible for the supply chain and is reviewed at least once a year.

Effective date : January 15 , 2024



(Mr. Amish Mafatlal Shah)

Managing Director



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Grievance Mechanism

Jewel Star Diamond Co.,Ltd. has established this grievance procedure to hear concerns about circumstances in the supply chain involving Silvers and coloured gemstones from conflict-affected and high-risk areas.

Mr. Tejas Shah is responsible for implementing and reviewing this procedure. Concerns can be raised by interested parties via email or telephone to:

Mr. Tejas Shah

Jewel Star Diamond Co.,Ltd.

322/11 E. Bangkok Gem & Jewelry tower, 10th floor.

Surawong Rd., Suriyawongse,

Bangrak,

Bangkok 10500 Thailand

Tel. +66 (0)2 1266789.

e-mail :- tj.jewelstar@gmail.co.th

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.





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- 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.

Effective date : January 15 , 2024



(Mr. Amish Mafatlal Shah)

Managing Director



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Responsible Jewelry Council Annual Report 2024

Backgrounds

Jewel Star Diamond Co., Ltd. established in 2023 by Mr. Amish Mafatlal Shah. He built up the company to support diamonds for jewellery manufacturing. In 2023 Jewel Star Diamond Co., Ltd. decided to be a member of the Responsible Jewellery Council (RJC). For all members of RJC should apply with code of practice to certify as a member of RJC in their supply chain. And promote code of practice – RJC among all business parties.

In General

Legal compliance

Jewel Star Diamond Co., Ltd. are responsible enterprises. We focus all activities to comply with the laws. They have established a person who monitors and follows the law to ensure that all activities comply with the laws and do not affect their business.

Policy and Implement

Jewel Star Diamond Co., Ltd. were established with responsible supply chain policies that include Human Rights, Child Labour Policy, Forced Labour Policy, and Non-Discrimination Policy, Safety and Health Policy. Good practices for responsible policies include Due Diligence Sourcing Policy, Bribery Policy, Anti-Money Laundering Policy, and Environment Policy. All policies are endorsed by management to promote and implement company policies and business partners. Management has set up one of our staff, Mr. Tejas Shah, as a responsible person for all of our policies.

Reporting

With transparency, Jewel Star Diamond Co., Ltd. shall set up the responsible annual report to promote their activities and engage with business partners. This report will be set up annually and communicated to business partners as a code of practice – RJC.

Finance and Accounts

Due to the company's good practices for responsible business, the company has established transparency and trust in our business. Our finance and accounts are standard audited by authorized accounting auditors.



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OECD Due diligence reporting 2024	
Company Name:	Jewel Star Diamond Co.,Ltd.
Date:	30 April 2025,
Reporting period:	March 2023 to March 2024
OECD Due Diligence Guidance	Action taken
Step 1: Establish strong company management systems	
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.	The company set up RJC – COP manual which the written of OECD steps and all of policies that RJC-COP required. This policies are communicate to supplier by e-mail and manual with the KYC process. All policies and OECD steps in this manual are adopted by Mr.Amish Mafatlal Shah Managing Director of Jewel Star Diamond Co.,Ltd.
1.B Structure internal management systems to support supply chain due diligence.	The company assigned Mr. Tejas Shah as responsible person for the due diligence process such as sending the KYC form, Evaluate the suppliers for risk assessment and consider for red-flag suppliers. But in this period they are no red-flag suppliers.
1.C Establish a system of controls and transparency over the minerals supply chain.	In the manual, all of our suppliers will identifying them self (KYC). They Identify the area that have conflict from http://www.cahhralist.net as for EU mention. And they should not sourcing Diamonds from conflict affected and high risk area. They should have all original guarantee. All of data that the suppliers sending is use to for evaluate the risk in due diligence process and keeping for 5 years.
1.D Strengthen company engagement with suppliers.	The company sending the letters to suppliers ask the suppliers to engage with Jewel Star Diamond Co.,Ltd. to promote RJC that they accepted and request them to fill in KYC form and give the company the essential data of sourcing material and the human rights respect issued.
1.E Establish a company-level, or industry wide, grievance mechanism as an early warning risk-awareness system.	The company having grievance mechanism process we sending it to suppliers and all stakeholder. That ware Mr.Tejas Shah is a responsible person. And go on process if there have the some request occurs.



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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 the KYC to identify the suppliers to be legitimate. The suppliers the give the data for all of policies in COP-RJC. And the sourcing come from many country. All sourcing data are answer as the questionnaire. And All the data will having risk assessment by the scoring system. Opportunity and Impact would be consider for the risk level in high or low risk or critical risk. After that they will checked the country origin and supplier name not in the list of CAHRA above and no in a list of Anti Money Laundry Organization. (AMLO-Thailand) which is the high risks.
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.	If responsible person consider they are in high risk even in CAHRA or in name list of AMLO, He will report to Managing Director for consider to mitigation to suppliers.
Devise and adopt a risk management plan.	If they have low risk we should development the relations to promote RJC. If there is a high risk the company were rise the red flag to supplier. The company should ask the supplier for mitigate and remedy process. But If they is a critical high risk the company should give the supplier stop having transactions with them. Until it were mitigation.
Implement the risk management plan and monitor performance of risk mitigation efforts.	We have grievance mechanism that all stakeholder can rise up the issued for company to consider and monitor performance of risk mitigation.
Internal training	All of the employee are trained about the COP-RJC.
Communications	We advised the suppliers and other stakeholders that we are the membership of RJC and communicate the information all issued of COP-RJC to all stakeholders.
OPTIONAL INFORMATION ON Step 4: Carry out independent third-party audit	
RJC COP audit	The company during the RJC-COP audit.
Grievances and remediation	We have grievance mechanism for all stakeholder if they have concern, they should complaint by the grievance mechanism process.

Ref.

<https://www.cahraslist.net/cahras>

<https://www.amlo.go.th/dpl/>

<https://www.amlo.go.th/index.php/th/2016-05-04-04-48-38/risk-countrie>

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