

SUPPLY CHAIN AND DUE DILLIGENCE PROCESS

Our company is strictly adhering to legal framework, ethical practices and deals only with those suppliers who comply with all international guidelines including the responsible gold supply chain policy.

The following due diligence process should be followed by the purchase department. The process shall be supervised by the compliance officer – Mr. Suresh Chandra Mohapatra.

Before Entering any business relation with suppliers, the company shall complete due diligence by obtaining:-

- a. Confidential reports from independent agencies such as D&B, Mira Inform, reputed international agencies, etc.
- b. Thorough google search shall be conducted so as to see if any adverse remarks about the prospective supplier are there.
- c. Personal queries from known people in the said area & personal interviews over phone.
- d. The company shall also obtain relevant KYC documents & latest financial reports of the supplier's organization such as legal identity number, tax returns, memorandum & article of association, etc.
- e. KYC documents of the main promoters/directors should also be called for.
- f. Location of the supplier shall be checked as to ensure that the supplier is not in the Conflict-Affected and high-risk areas nor Red-Flagged by checking the site – www.cahralist.net/cahras. The supply of material is not sourced or transported through a conflict & high risk area.
- g. It should be ensured that the supplier or its country is not including in anti-money or terrorist activity by checking the site OFAC list – <https://sanctionssearch.ofac.treas.gov/>
- h. The goods are not originating from a country that has limited known reserves by checking and visiting the site – <https://tradingeconomics.com/country-list/gold-reserves>.
- i. Memorandum of understanding should be executed duly signed by the authorized person of the supplier incorporating amongst others the following: -
 - i. Child labour (less than the 18 years of age), forced labour are not being engaged.
 - ii. Anti-money laundering guidelines are being duly followed & the organization does not accept or pay bribe for any work.
 - iii. Adherence to the OECD (Organization for Economic Co-Operation & Development) guidelines latest edition (2011 edition) & its supplement on gold in toto while duly obeying domestic laws.
 - iv. Not securing any exemptions not contemplated in the statutory or regulatory framework related to human rights, environmental, health, safety, labour, taxation & financial incentives, etc.
 - v. Applying good corporate governance drawn from the OECD principles of corporate governance.
 - vi. The supplier should be assessed with Risk and Risk assessment checklist & assigned risk rating.
 - vii. Updating of KYC documents of the organization & confidential report from the independent agencies shall be followed every year.

Mr. Suresh Chandra Mohapatra – is designated as compliance officer and any concern related to supply chain can be submitted anonymously also to him.

Email-
Phone No.

