

## Supply Chain Policy

Bangkok Assay Office Co.,Ltd is Thailand first Assayer established to support Jewelry manufactures certified their export items and also provide refinery service to recycle gold, silver and PGM from manufacturing process since 1985. This policy confirm Bangkok Assay Office's commitment to respect human rights, avoid contributing the finance of conflict and comply with all relevant UN sanctions, resolutions and laws.

Bangkok Assay Office Co.,Ltd is a certified 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.

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;

The company shall verify counterparty details, including the Know Your Customer (KYC) for any precious gems stones and 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 beach of it.

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.

### **Regarding serious abuses associated with the extraction, transport or trade of diamonds/coloured gemstones**

We will neither tolerate nor profit from, contribute to, assist or facilitate the commission of: torture, cruel, inhuman and degrading treatment; forced or compulsory labour; the worst forms of child labour; human rights violations and abuses; or war crimes, violations of international humanitarian law, crimes against humanity or genocide.

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.



**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.



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Managing Director

Date of effect 19/5/2022