

# GANDHI ENTERPRISES CO., LTD.

Name of Company Name: Gandhi Enterprises Co., Ltd.

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Prepared By: Growlity, Inc.



# GANDHI ENTERPRISES CO., LTD.

1249/128 Charoenkrung Rd., Gems Tower 12/F.,  
Suriyawongse, Bangrak, Bangkok 10500, Thailand

## RJC Annual report COP 7 Due Diligence

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### Step 1: Establish strong company management systems

Gandhi Enterprises Co., Ltd. has the following RJC, KYC, and Counterparties Due-Diligence Policy in place with regard to our supply chain on the coloured gemstones originating from conflict-affected and high-risk areas. These policies are communicated to our counterparties already and can be accessed via website.

To support supply chain due diligence, we have implemented the following internal measures via OECD five step framework. The senior manager responsible for overseeing supply chain due diligence is our Factory Managing Director, Mr. Vikas Gandhi.

Gandhi Enterprises Co., Ltd. has established a system of controls and transparency over our supply chain; which include, our approach for identifying suppliers via our KYC form and identifying sources of coloured gemstones. These methods have strengthened our due diligence efforts by asking them to fulfill our questionnaire which require more details about their policies including organization member's certificate.

As a company we communicate our expectations regarding supply chain due diligence via helping our suppliers to recognize the OECD guidance and our policies

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and help them to practice these policies accordingly. The outcome of doing so has been positive with well understanding.

Our grievance mechanism for both internal and external stakeholders can be accessed by our factory managing director's email, Mr. Vikas Gandhi.

## **Step 2: Identify and assess risk in Supply Chain**

We have assessed our supplier's due diligence practices by checking the name from reliable website (FATF, United Nations Sanctions List, and Thai AMLO) and list of resource for identifying CAHRAs and Geneva Academy Rule of Law in Armed Conflicts. Next, we have check whether the supplier has an issue in these criteria (Bribery/ Corruption, Money Laundering, Human Rights, Labour laws, Forced Labour, Child Labour, Health& Safety).

During our assessment of our supplier's due diligence practices in previous year, we did not find any risks within our supply chain.

## **Step 3: Design and implement a strategy to respond to identified risks**

To respond to the risks identified within our supply chain, we will use our risk assessment form to evaluate their risk as low risk, medium risk, high risk. Our risk management plan consists of the following:

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- Concern as Low Risk if counterparty has no issue in KYC process (can be identified and not be in any sanction list) and no issue in due diligence (such as CAHRAs, bribery and corruption, Money Laundering, Human Rights, etc.)
- Concern as Medium Risk if counterparty has no issue in KYC process but have some minor issue such as not have the policy
- Concern as High Risk or Red Flag if counterparty cannot be identified in KYC process or has a list in CAHRAs list.

To implement our risk management plan we will keep continue business with low risk counterparty and will keep monitor closely with medium risk counterparty but we will stop the business if we found high risk or red flag counterparty. We continue to monitor the plan and track the effectiveness of these risk mitigation measures by asking medium risk counterparty every year. In addition to this, we evaluated improvement of this risk after six months through High Risk counterparty if they still want to do the business with us.

[Gandhi Enterprises Co., Ltd.](#) provided the training regarding our due diligence activities to our employees and business party on every year; this training included information on update RJC COP and new policies implement. We have also provided training regarding our due diligence activities to all of our employees; this training included information on update KYC form and update risk assessment procedure.

[Gandhi Enterprises Co., Ltd.](#) communicate to our stakeholders regarding our due diligence activities. This communication is in the form of email and public on the website.

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No grievances have been raised regarding human rights risks or our supply chain due diligence.

Gandhi Enterprises Co., Ltd. has joined the RJC in 2022 and complying all the requirement of COP 2019.

By,



Gandhi Enterprises Co., Ltd.

Date: - 01/01/2022

