



Creations Gems and Jewellery Private Limited

MANUFACTURERS OF FINE JEWELLERY
CIN : U95240MH2023PTC401623

Creations Gems and Jewellery Pvt. Ltd.

Annual Responsible Sourcing Due Diligence Report

Reporting Period: January 1, 2024 – December 31, 2024

Issued: 02nd May 2025

Prepared by: Compliance Officer

1. Company Overview

Creation Gems and Jewellery Pvt. Ltd. is a jewellery manufacturing company engaged in sourcing, processing, and retailing precious metal and gemstone-based jewellery. The company is committed to ethical sourcing practices aligned with international due diligence standards.

2. Policy Commitment

Creations Gems and Jewellery Pvt. Ltd. has adopted and published a Conflict Minerals and Responsible Sourcing Policy, consistent with:

- OECD Due Diligence Guidance (3rd Edition)
- RMI Responsible Minerals Assurance Process (RMAP)
- LBMA Responsible Gold Guidance
- The Universal Declaration of Human Rights and ILO Fundamental Principles

3. Management Systems

- **Governance:** The Compliance Officer leads our due diligence program and reports to senior management.
- **Supplier Engagement:** Suppliers are required to acknowledge and comply with our Responsible Sourcing Policy.
- **Documentation:** All suppliers are subject to documentation review and must provide origin disclosures and certifications.

4. Risk Assessment Methodology

Creations Gems and Jewellery Pvt. Ltd. follows Step 2 of the OECD Guidance to:

- Identify red flags related to gold origin and transit.
- Evaluate supplier due diligence programs and certifications (e.g., RMI-conformant smelters).
- Request supplier documentation, including RMAP certificates and due diligence policies.

5. Findings and Identified Risks

During the reporting period:

- All gold was sourced through RMI-conformant refiners.
- No red flags were identified related to origin, transport, or conflict financing.
- No incidents of human rights violations, bribery, or money laundering were reported or detected.

6. Risk Management Actions

- Conducted supplier reviews and obtained conformance documentation.
- Continued education of sourcing and procurement staff on OECD due diligence principles.

7. Plans for Continuous Improvement

- Introduce an internal supplier audit checklist in 2025.
- Encourage more upstream suppliers to provide direct traceability documentation.
- Participate in industry webinars and training sessions focused on responsible sourcing.

8. Conclusion

Creations Gems and Jewellery Pvt. Ltd. affirms its commitment to ethical and conflict-free gold sourcing. This report demonstrates our compliance with the OECD Due Diligence Guidance (Step 5.A) and relevant RMI standards applicable to downstream companies.

Approved by:

Name **ARCHANA DHURKUBHAR**
Compliance Officer
Creations Gems and Jewellery Pvt. Ltd.
Date 02nd May 2025

