



# *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:** 02<sup>nd</sup> 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 DHURAKHAR**  
Compliance Officer  
Creations Gems and Jewellery Pvt. Ltd.  
Date 02<sup>nd</sup> May 2025

