

### **Section A: General Information about the Company:**

The Design House is a top jewelry manufacturer based in Mumbai, India. We have tremendous expertise in producing high-quality products for over 20 years. We service established and emerging brands, department stores and retail chains that want to create their own private labels.

Partnering with us allows you to focus on the front end of sales, marketing and branding. Leave the sourcing and manufacturing to us.

Our factory is RJC Certified so you can be rest assured of all the best practices.

### 20 Years of Skilled Making

### **Start to Finish**

- Tree Making
- Casting
- Finishing
- Gemstone Setting
- Assembly
- Plating

### **Best-in-Class Machinery**

### **Cutting edge tech**

- Schultheiss
- Yasui
- Riace
- Elma
- Legor
- Laser Star

We are dedicated to making beautiful jewelry using a perfect combination of art and science.

Pure certified raw materials



Our trained technicians cast and finish perfectly in yellow, white and rose gold from 8K to 18K, as well as sterling silver and brass. Rigorous testing procedures in place guarantee the highest quality in all our products.

### **Section B: Financial compliance of the THE DESIGN HOUSE:**

### 2.1 Money Laundering, Terrorism Financing, Other Financial Offences

#### **Current Status**

- THE DESIGN HOUSE recognizes the fact that entities in the gems and jewellery sector have to take on the onus of analysing their potential vulnerabilities to money laundering and implement specific steps that are required for protection against abuse by criminals.
- Strict compliance is ensured at all the entities and compliance officer has been appointed who in turn reports to THE DESIGN HOUSE Management on compliance status on annual basis.
- Know Your Counter Party and other compliance of Due Diligence is followed in line with OECD guidance.
- Ongoing monitoring is carried out along with all stakeholders.

#### **Area of concern & Remedial Measures**

Nil As on Date.

#### 2.2 Kimberley Process and System of Warranties

- THE DESIGN HOUSE is fully committed to complying with all the requirements specified in the Kimberley Process Certification Scheme of World Diamond Council's (WDC) System of Warranties Declaration.
- Day to day monitoring and compliance of SOW is done by compliance officer.
- THE DESIGN HOUSE is committed towards conflict free sourcing and zero tolerance policy is followed at THE DESIGN HOUSE level.

#### Area of concern & Remedial Measures

• Nil As on Date.



### 2.3 Anti-Bribery and Facilitation Payment Policy:

- The THE DESIGN HOUSE shall ensure complete prohibition Bribery and facilitation payment across organization and in all the entities.
- THE DESIGN HOUSE has published compliance team contact details on website to receive any grievance or complaints.

#### Area of concern & Remedial Measures

Nil As on Date.

### 2.4 Ethical Sourcing of Loose Diamonds Policy:

- Our company is concerned about the environment and social impacts of irresponsible mining.
- THE DESIGN HOUSE has identified the risk of supply chain with respect to Conflict Affected High Risk Area.
- THE DESIGN HOUSE ensure all its supplies are screened for conflict free supplies.
- We have published the OECD based ethical sourcing policy and we are communicating our policies to all the supply chain partners and pushing them to adopt the same.

#### Area of concern & Remedial Measures

- Current concern is lack of awareness about OECD regulation and requirements of sourcing.
- We have started creating awareness about our Ethical sourcing requirements for our supply chain.
- We started Engagement with our global supply chain for obtaining the further supply chain information to ensure ethical and conflict free sourcing in metal business.

### 2.5 Social Compliance

 We ensure full compliance with all applicable national and, where appropriate, international laws / regulations with respect to employment and labour codes in all our establishment.



- We respect all regulation for child labour, forced labour, non-discrimination, non-retaliation etc.
- All work man rights are respected and adhere to freedom of association and collective bargaining regulations.

#### **Area of concern & Remedial Measures**

- No point has been reported in the social compliance of the THE DESIGN HOUSE where remedial measures at THE DESIGN HOUSE level is required.
- Company level remedial measures are taken based on internal and external audits conducted by reputed agencies.

### 2.6 Health and Safety

- We at THE DESIGN HOUSE are concern about the health and safety of employees
  and are constantly studding about any adverse impact of our business processes are
  identified and eliminated. Towards this end, we will systematically review our
  operations to identify sources of health and safety related risks.
- This review will use appropriate standards as required by prevailing laws, expert opinion, and our knowledge of best practices.
- All our staff will be trained in the manner required to adhere to these work practices and drills.
- The health of our staff, exposed to certain hazardous processes, is be monitored periodically through appropriate medical checks, and reviewed using expert inputs for improvements.
- All workplaces are constructed to meet safety standards with local regulations as the minimum standards that will be applicable.

#### Area of concern & Remedial Measures

- Nil as on date, as no accidents are reported in last one year.
- Organization has been blessed and we did not have any fire or any other incidents leading to dangerous circumstances.



### 2.7 Human Rights

- THE DESIGN HOUSE is not and will not interfere in the right of employees to observe tenets or practices based on caste, race, national origin, gender, religion, disability, union membership, or political affiliation.
- The Company strongly discourages any form of sexually coercive, threatening, abusive or exploitative behaviour.
- Any reported incidents relating to direct or indirect physical, sexual, racial, religious, psychological, verbal, or any other form of harassment or abuse, or any other form of intimidation or degrading treatment will not be tolerated by the company.
- THE DESIGN HOUSE ensures that none of its suppliers and stake holder have engaged in any activity which can violate the Human Right Principles.
- We have carried out the Human Right Due Diligence of suppliers and other Stake holders & based on risk assessment where necessary.

### Area of concern & Remedial Measures

- No Area of concern & Remedial Measures has been raised in the Human right for any of our operating units.
- Supplier's further upstream compliance with respect to Human Right compliance for conflict free sourcing is a new development, where company is heading and would require more focus on the same.

### 2.8 Environment Protection

- THE DESIGN HOUSE is Complying with all applicable environmental laws and regulations.
  - Improvement is seen employee's environmental awareness and performance with the help of detailed policies and procedures, training, and recognition of excellence.

#### Area of concern & Remedial Measures

• Nil, mainly Sales office and no manufacturing activity.



<b>Company Name:</b>	THE DESIGN HO	OUSE.	
Date:	4 <sup>th</sup> September, 2024		
Reporting Period:	Financial Year 2023-24		
Step 1: Establish stron	g company manager	ment systems	
1.A. Adopt and clearly communicate to suppliers and the public, a company policy for the supply chain of minerals originating from conflict- affected and high-risk areas		<ul> <li>We have published the policy at company level for easy accesses to stakeholder.</li> <li>OECD and Best Practice Annual communication has been sent to all the active supplier.</li> <li>Awareness presentation on Ethical sourcing based on OECD guideline has been circulated.</li> <li>Detailed policy and procedure at company level has been established based on risk of CAHRA's is done.</li> </ul>	

- 1.B Structure internal management systems to support supply chain due diligence.
- Additional responsibility has been assigned to Compliance officer to look over the compliance of Ethical souring policy.
- All key employees involved in souring and procurement of precious metals have been trained on our Ethical precious metal souring policy. Refresher trainings are provided.
- List of Suppliers has been maintained along with status of their social and ethical compliance.
- On going monitoring of each supply and associated suppliers is carried out with



	the help of tools such as digital media,
	web search, review of supply documents,
	declaration and market intelligence etc.
1.C Establish a system of controls and	Supplier upstream information collection
transparency over the minerals supply	process started and to obtained CAHRA's
chain.	information and Ethical sourcing
	compliance at supplier level.
	• Currently The Design House 80% and
	above supply from law risk and balance
	20% is from non-regular suppliers.
1.D Strengthen company	• As mentioned above supplier
engagement with suppliers.	questionnaire has been circulated and we
	are in the process of following up with
	them to obtained the filed information
	from them.
	• Further we are also obtaining the vital
	information about suppliers from social
	platforms and social compliance
	registration such as BPP & RJC,
	Approved ASM programs etc
	We are in the process of compiling filled
	supplier questionnaire data, after analysis
	we will be formulate supplier engagement
	practices based on risk reported at each
	supplier level (if any)
1.E Establish A Company-Level,	• We have established the grievance
Or Industry Wide, Grievance	handling policy and procedure at
Mechanism as An Early Warning	company level, contact details of
Risk-Awareness System.	compliance head provided in Social and
Tion Time of the first of the f	Ethical policy on our Web site under



Business Principal Section (which is publicly available)

### Step 2: Identify And Assess Risk In The Supply Chain

Identify And Assess Risks in The Supply Chain and Assess Risks of Adverse Impacts.

- We have established the detailed policy and procedure for identification of risk at Company level.
- Company has appointed and trained compliance officer to oversee the financial and ethical sourcing compliances.
- We have categorized supply chain in to 2 major segments that its Secondary supplier and Open market suppliers.
- All suppliers are bifurcated in to this category and open market supplies are considered as potential risk for supplies from CAHRA's and thus step by step information are gathered from this category of supplier as mentioned in point 1.B & 1.C.

# Step 3: Design And Implement a Strategy to Respond to Identified Risks (If Applicable)

Report Findings of The Supply Chain Risk Assessment to The Designated Senior Management of The Company.  Ongoing monitoring of each supply is done by compliance officer to confirm its free from Conflict, were required Red Flags are been raised for seeking additional information and closed after receiving such information to our satisfaction.



	<ul> <li>Compliance officer shall report all unanswered flags to Top management.</li> <li>In worst situation where information is half or not satisfactory management starts engagement practice and discussion and dialogue with suppliers is carried out to ensure full information in further business.</li> </ul>
Devise And Adopt a Risk Management Plan.	<ul> <li>We have formulated the risk management plans at company level considering in supply chain and position of supplier in supply chain.</li> <li>Company compliance officer carries out monitoring of each and every business transaction and were required Red Flags are been raised and further steps are followed as mention above.</li> <li>Brief of companies Risk Management Practices has been mentioned in communication of Business policy on our website.</li> </ul>
Implement The Risk Management Plan and Monitor Performance of Risk Mitigation Efforts.  Internal Training	<ul> <li>Organization level monitoring of Red Flags, however during the period no red flag identified.</li> <li>Compliance officer provides period status reports of OECD compliance to the management.</li> <li>Organisation provides period training to all the concern employee involved in buying and selling and compliance</li> </ul>



	monitoring team.
Communications	Business principle has been published on
	the website covering all the COP wise
	policy including Ethical Precious Metal
	souring policy of the organisation.
	Over and above Annual communication
	on Business policy and Awareness on
	various best practices and expectation
	from business partners is communicated
OPTIONAL INFORMATION ON Step 4	: Carry Out Independent Third-Party Audit
RJC COP Audit	Factory has finalised a Re-Certification
	audit on 16 <sup>th</sup> to 18 <sup>th</sup> September, 2024 for
	the RJC COP 2019.
Grievances And Remediation	No grievance of what so ever has been
	reported till date.

Prepared & Approved By: Mr. Shailendra Jani

Date: 4<sup>th</sup> September, 2024