

## RJC Management Review Meeting & Annual Report

An annual management review meeting has been conducted at GEMASIA BV on November 10<sup>th</sup>, 2021

The following points were reviewed:

1. There are no changes observed in the section 'General Requirements'.
2. All our Business Partners are screened with regards to AML legislation and Bribery issues and no major risks have been assessed.
3. The Company has performed its Annual Human Rights Due Diligence and no adverse Human Rights impacts have been observed for the past year.
4. We have started to roll out our implementation of the COP7 standard in line with our policy and procedures. To date, we have received fully completed and signed Supply Chain Due Diligence forms from 49% of our suppliers. Based on these encouraging initial results, we will continue to solicit all remaining suppliers to comply with our Supply Chain Due Diligence as per our SCDD procedures with the aim of reaching 100% within 6 months.
5. No direct sourcing from artisanal and small-scale mining has occurred in the past year.
6. The security in our offices has been maintained at a satisfactory level and no security breaches have been observed.
7. We are completing the process to obtain written assurances from all our suppliers concerning provenance claims.
8. No violations to labour rights and working conditions have been observed.
9. There have been no Health & Safety occurrences in the period under review.
10. No breach of product integrity has been observed and all procedures have been followed

No new risks have been identified.

Any request for additional information and/or communication may be addressed at [info@gemasiagroup.com](mailto:info@gemasiagroup.com), we assure a timely response in line with our communication procedures.

Antwerp, November 10<sup>th</sup>, 2021



Mr. Shah Himanshu  
Director GEMASIA BV



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2. Human Rights Due Diligence Review				Responsible Inventory Control				
2.1 Human Rights Issue (including COP Reference and	No.	2.2 Indicator	2.3 Tips and Guidance	2.4 Your Response	2.5 Recommended Next Steps	2.6 Supporting Information / Evidence	2.7 Next Review Date	2.8 Comments / Notes
		Below are indicators or types of systems and processes that the Member should have in place.	Tips and issues to consider when preparing the response and supporting notes / evidence for each indicator.  (Click on the cell to be able to scroll down.)	Please note whether you meet this indicator.  (Select form the menu options)	Based on your response, a message will be generated that recommends the next steps for you.	Please list any supporting notes, evidence, relevant information and/or an explanation for your response.	Nominate the next Human Rights Due Diligence review date.	Comments or notes about the risk.
Use the toolkit to confirm implementation of these core human rights-related COP requirements.								
General Employment Terms (COP 13) • Right to Privacy	1	Privacy rights of employees are respected when gathering personal information or implementing employee-monitoring practices.	Privacy legislation is a good example of a human right now enshrined in the applicable law of most countries. Consider how you provide for safe storage of private information about employees and applicants in recruitment processes. Make sure employees know under what circumstances their emails or internet access etc may be accessed. Where appropriate for the size of your business, consider a privacy policy, outlining data collection and monitoring practices, how the information is stored, who has access, and why the	Managed via RIC COP Implementation	Please provide reference to the related COP Self Assessment or other corrective action(s) underway to manage this Humans Rights issue.	Company respects Belgian legislation in all aspects of Employment, including Privacy (see COP 13)	Yearly after re-certification	
Child Labour (COP 17) • Abolition of child labour • Right to education	2	Minimum age and appropriate work requirements of the Code of Practices are being upheld.	Check your responses in the RIC Assessment Workbook (your Self Assessment). Consider both the general minimum working age (generally 15 years old) and that for hazardous work (generally 18 years old). See the Child Labour Standards Guidance chapter for more information.	Managed via RIC COP Implementation	Please provide reference to the related COP Self Assessment or other corrective action(s) underway to manage this Humans Rights issue.	No children employed		
Child Labour (COP 17) • Abolition of child labour • Right to education	3	If the Member becomes aware of a situation of child labour, a documented remediation process is developed.	Check your responses in the RIC Assessment Workbook (your Self Assessment). Consider both the general minimum working age (generally 15 years old) and that for hazardous work (generally 18 years old). See the Child Labour Standards Guidance chapter for more information.	Managed via RIC COP Implementation	Please provide reference to the related COP Self Assessment or other corrective action(s) underway to manage this Humans Rights issue.	No children employed		
Forced Labour (COP 18) • Abolition of slavery and forced labour • Freedom of movement	4	The Member does not use forced labour in its various forms in accordance with the Code of Practices.	Check your responses in the RIC Assessment Workbook (your Self Assessment). Consider risk to direct forced labour, restrictions on freedom of movement, and risks of human trafficking. See the Forced Labour Standards Guidance chapter for more information.	Managed via RIC COP Implementation	Please provide reference to the related COP Self Assessment or other corrective action(s) underway to manage this Humans Rights issue.	Company respects Belgian legislation in all aspects of Employment.		
Freedom of Association and Collective Bargaining (COP 19) • Right to organize and participate in collective bargaining	5	The Member respects the right to associate freely and participate in collective bargaining in accordance with the Code of Practices.	Check your responses in the RIC Assessment Workbook (your Self Assessment). Consider whether employees can join or form a trade union of their choice and engage in good faith negotiations if they wish. Consider ways to engage in dialogue with your employees, for example through regular meetings with employee representatives. See the Freedom of Association and Collective Bargaining Standards Guidance chapter for more information.	Managed via RIC COP Implementation	Please provide reference to the related COP Self Assessment or other corrective action(s) underway to manage this Humans Rights issue.	Company respects Belgian legislation in all aspects of Employment, including freedom of association and collective bargaining.	Yearly after re-certification	



2. Human Rights Due Diligence Review							2.8 Comments / Notes
2.1 Human Rights Issue (Including COP Reference and No.)	2.2 Indicator	2.3 Tips and Guidance	2.4 Your Response	2.5 Recommended Next Steps	2.6 Supporting Information / Evidence	2.7 Next Review Date	
	Below are indicators or types of systems and processes that the Member should have in place.	Tips and issues to consider when preparing the response and supporting notes / evidence for each indicator.  (Click on the cell to be able to scroll down.)	Please note whether you meet this indicator.  (Select form the menu options)	Based on your response, a message will be generated that recommends the next steps for you.	Please list any supporting notes, evidence, relevant information and/or an explanation for your response.	Nominate the next Human Rights Due Diligence review date.	Comments or notes about the risk.
Non-Discrimination (COP 20) • Right to non-discrimination • Right to equal pay for equal work • Right to family life • Right to hold opinions • Freedom of information and expression	The Member upholds principles of non-discrimination in accordance with the Code of Practices.	Check your responses in the RIC Assessment Workbook (your Self Assessment). Consider risk re recruitment processes, remuneration and promotions, family leave arrangements, workplace culture, controls against harassment and bullying, training in non-discriminatory practices for sales staff and product advertising. See the Non-Discrimination Standards Guidance chapter for more information.	Managed via RIC COP Implementation	Please provide reference to the related COP Self Assessment or other corrective action(s) underway to manage this Humans Rights issue.	Company has non-discrimination policy (see COP 20)	Yearly after re-certification	
Business-specific risks	The business has a means to identify and manage other human rights risks, if any, arising through its own activities.	Businesses may have specific or higher risks of adverse human rights impacts due to their location, activities, or working environment. Changes to the business may also trigger exposure to new human rights risks. Having a means to regularly consider other business-specific or emerging risks will help to integrate human rights considerations into day-to-day operations. This can form part of management meetings, decision-making activities, and prioritisation of actions to mitigate these risks.	Broadly managed	Please document the processes and controls used to support this response. No further action is required unless there is a change to the business.	Company is sensitive to human rights issues and risks, and considering its small size, relies mainly on the good standing of its business partners to limit any HR related risks.	Yearly after re-certification	
Use the toolkit to review human rights risks with business partners and in challenging situations.							
Business Partners (COP 5)	The business expects respect for human rights from its significant Business Partners.	This can be communicated by the business' own policy to respect human rights, which can be shared with business partners.  Depending on the risks and the relationship, it may also be possible to make reference to possible risks in your contracts or supplier agreements.  In some cases, the business may decide that auditing or monitoring performance may be relevant, and this	Managed via RIC COP Implementation	Please provide reference to the related COP Self Assessment or other corrective action(s) underway to manage this Humans Rights issue.	See Company's HR policy and RJC global policy.	Yearly after re-certification	
Business Partners (COP 5) • Right to a safe and healthy work environment • Right to rest and leisure	If orders are placed to suppliers with very tight deadlines, the business has considered potential human rights risks.	Purchasing practices can be a significant risk factor for adverse human rights impacts. For example, changing product or service requirements for suppliers at the eleventh hour, without adjusting production deadlines and prices, may push suppliers to breach labour standards in order to deliver. In such situations, businesses have been accused of contributing to adverse human rights impacts through their direct business relationships.	Not Applicable	Please document the reason for the Not Applicable Response.	See Self Assessment, see business partner assessments. Company has no business processes nor the required size of orders which would imply very tight deadlines with suppliers.		
Business Partners (COP 5)	The business knows how it will respond in the event that it becomes aware that a Business Partner is not respecting human rights.	This could be formally documented in a policy or procedure, or for smaller businesses it could simply be that management would need to work out its response depending on the issue.  Think about how existing systems and practices can be used, so that management of human rights is integrated into these wherever possible. This tool kit can help identify areas of potential human rights risk that may need your action to prevent or mitigate the risks.	Broadly managed	Please document the processes and controls used to support this response. No further action is required unless there is a change to the business.	Any eventual non-respect of HRs with BP's would lead to immediate suspension of commercial relationship and could lead to termination of commercial relationship with non-compliant	Yearly after re-certification	



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<b>Conflict-Affected Areas (COP 6.2)</b> • Right to life, liberty and security of the person • Freedom from torture or cruel, inhuman or degrading treatment • Right to non-discrimination • Right to self-determination • Humanitarian law		If operating or planning to operate in a conflict-affected area, the business has formally assessed the heightened human rights risks.		Conflict-affected areas automatically raise a 'red flag' for risk of major human rights abuses. Gold, diamond and platinum group metals related operations can all be found in conflict-affected areas. If operating in such areas, it is essential to understand and assess these risks.  This is best carried out with a risk assessment, or similar, to formally document your findings. The risk assessment can be stand-alone or integrated in other.		Not Applicable		Please document the reason for the Not Applicable Response.		Company does not operate in conflict affected areas.		Yearly after re-certification			
<b>Conflict-Affected Areas (COP 6.2)</b> • Right to life, liberty and security of the person • Freedom from torture or cruel, inhuman or degrading treatment • Right to non-discrimination • Right to self-determination • Humanitarian law		If sourcing diamonds, gold or platinum group metals directly from conflict affected areas, the business has formally assessed the heightened human rights risks.		Assessing the heightened risks of major human rights abuses through suppliers can be complex. Access to up-to-date local information, finding ways to work with business partners on these issues, and decision-making in complex circumstances can be very challenging.  It can be helpful to seek advice from credible external sources, including civil society organizations working in or reporting from the area. Where appropriate, consider seeking advice from Governments, including		Not Applicable		Please document the reason for the Not Applicable Response.		Company does not operate in conflict affected areas.					
<b>Conflict-Affected Areas (COP 6.2)</b> • Right to life, liberty and security of the person • Freedom from torture or cruel, inhuman or degrading treatment • Right to non-discrimination • Right to self-determination • Humanitarian law		If operating or planning to operate in, or sourcing diamonds, gold or platinum group metals directly from, a conflict-affected area the business has put in place systems to prevent or mitigate the identified risks.		Wherever possible, integrate steps to address the identified risks with implementation of other COP provisions. • Consider heightened risks of bribery and corruption in conflict-affected areas, and regularly review implementation of the policies and procedures developed under Bribery and Facilitation Payments. • Consider heightened risks associated with use of security forces. Members with Mining Facilities are required to conduct security risk assessments and		Not Applicable		Please document the reason for the Not Applicable Response.		Company does not operate in conflict affected areas.					
<b>Sourcing from Artisanal and Small-Scale Mining (ASM) (COP 7)</b> • Right to a safe and healthy work environment • Right to physical and mental health • Right to life, liberty and security of the person • Abolition of child labour • Right to education		If sourcing diamonds, gold or platinum group metals directly from ASM, the business checks that the ASM: • has controls to prevent the use of forced labour and worst forms of child labour • has work place health & safety practices which		If the ASM suppliers are located within the area of operation of a Member with mining facilities, the Member should identify risks, and conduct efforts to reduce or avoid risks, as an integral part of its community engagement program and impact assessments and risk mitigation planning.  If the ASM suppliers are located in a different area from the Member, the Member could assess risks from in-house and/or use professionals with local experience. Site visits will be needed to assess these human rights risks and work out ways to improve practices where		Not Applicable		Please document the reason for the Not Applicable Response.		Company does not source from ASM.					
<b>Sourcing from Artisanal and Small-Scale Mining (ASM) (COP 7)</b> • Right to a safe and healthy work environment • Right to physical and mental health • Right to life, liberty and security of the person • Abolition of child labour • Right to education		If sourcing diamonds, gold or platinum group metals directly from ASM, the business collaborates and use best endeavours to support the ASM improve its practices in relation to human rights, health & safety and environmental performance.		Approaches to monitoring and remediate the identified risks could include: • Monitoring of site conditions and practices, potentially via site visits by the Member or its representatives. • Training and other forms of technical assistance and advice to improve working conditions and reduce impacts, particularly with respect to the use of mercury, environmental management, and health and safety. • Capacity building measures, such as support for community health and educational projects, and community education on forced and child labour issues. • Financial incentives, where appropriate, to encourage		Not Applicable		Please document the reason for the Not Applicable Response.		Company does not source from ASM.					



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Security (COP 11) <ul style="list-style-type: none"><li>• Right to privacy</li><li>• Right to life, liberty and security of the person</li><li>• Freedom from degrading treatment</li><li>• Right of peaceful assembly</li></ul> Supply chain-specific risks	If the Member uses security service providers, respect for human rights is expected and supported in accordance with the Code of Practices.	16		Check your responses in the RUC Assessment Workbook (your Self Assessment). Consider how you make human rights expectations clear to service rights providers, whether they carry out internal training on appropriate use of force, non-discrimination and privacy issues if carrying out surveillance or physical searches. See the Security Standards Guidance chapter for more information.	Managed via RUC COP Implementation	Please provide reference to the related COP Self Assessment or other corrective action(s) underway to manage this Humans Rights issue.	Company does not use security service providers.		
	The business has a means to identify and manage other human rights risks, if any, directly linked to business' operations, products or services by business relationships.	17		Some parts of the supply chain may have specific or higher risks of adverse human rights impacts due to their location, activities, or working environment. New business partners may also trigger exposure to new human rights risks. Having a means to regularly consider other business-specific or emerging risks will help to integrate human rights considerations into day-to-day operations. This can form part of management meetings, decision-making activities, and prioritisation of actions to mitigate these risks.	Broadly managed	Please document the processes and controls used to support this response. No further action is required unless there is a change to the business.	Company is sensitive to human rights issues and risks, and considering its small size, relies mainly on the good standing of its business partners to limit any HR related risks.	Yearly after re-certification	
Consider how well human rights considerations have been integrated in business systems.									
Legal Compliance (COP 1)	Systems for awareness and compliance with Applicable Law include coverage of human rights areas in this Toolkit.	18		While the international human rights framework is important to be aware of, most relevant human rights principles for businesses are enshrined in the national law of most countries.  Some human rights impacts are illegal actions. In those cases, the business in question might face legal consequences, and compliance with the law could probably have avoided the negative impact. In other cases, human rights risks may be 'grey zones' where it is not clear if they are illegal.	Managed via RUC COP Implementation	Please provide reference to the related COP Self Assessment or other corrective action(s) underway to manage this Humans Rights issue.	Company is compliant with Belgian law which has endorsed all HR principles.	Yearly after re-certification	
Policy and Implementation (COP 2)	Senior management's review of the ongoing suitability and adequacy of the Member's business practices includes consideration of human rights risks.	19		The COP requires an at least annual review of the Member's business practices to look for opportunities for improvement. Use this Toolkit as a baseline for raising any relevant human rights risks, and consider how well they're being managed.	Managed via RUC COP Implementation		Company subscribes to yearly review of its business practices, including those on HR.	Yearly after re-certification	
Reporting (COP 3)	Communication to stakeholders includes reference to your general approach to addressing human rights risks.	20		Communicating about your general approach is an important part of how you manage human rights risks. However it is not expected that a business should reveal publicly all the issues identified in its due diligence, or the steps it takes to mitigate every risk identified.  The form and content of communication about human rights should be tailored to the audience. Work out how you will communicate what you do to potentially or actually affected individuals. Your communication	Managed via RUC COP Implementation	Please provide reference to the related COP Self Assessment or other corrective action(s) underway to manage this Humans Rights issue.	Company has necessary provisions in its global RUC policy to address HR related issues, policy is communicated to its Business partners and stakeholders.	Yearly after re-certification	



Prepare Action Plan (based on Recommended Next Steps)

Specify Row to delete (Note: Row 10 or higher)

Delete Row

Responsible  
Jewellery  
Council

H.A.C.V.



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PERKILAN

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