

R.A. GEMS (HONG KONG) CO LTD

DUE DILIGENCE PROCESS OF HUMAN RIGHTS FOR THE MONTH OF SEPTEMBER 2024

Date: 03.09.2024

DOC. NO: RAG-HRT-014

2. Human Rights Due Diligence Review								
2.1 Human Rights Issue (including COP Reference and Risks)	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. <i>(Click on the cell to be able to scroll down.)</i>	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 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.		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.	RJC Policy and Procedure document (Doc. No. RAG-RJC-001)	03-Mar-25	Low Risk
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.		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.	RJC Policy and Procedure document (Doc. No. RAG-RJC-001)	03-Mar-25	Low Risk
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.		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.	RJC Policy and Procedure document (Doc. No. RAG-RJC-001)	03-Mar-25	Low Risk
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.		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.	RJC Policy and Procedure document (Doc. No. RAG-RJC-001)	03-Mar-25	Low Risk
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.		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.	RJC Policy and Procedure document (Doc. No. RAG-RJC-001)	03-Mar-25	Low 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	6	The Member upholds principles of non-discrimination in accordance with the Code of Practices.		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.	RJC Policy and Procedure document (Doc. No. RAG-RJC-001)	03-Mar-25	Low Risk
Business-specific risks	7	The business has a means to identify and manage other human rights risks, if any, arising through its own activities.		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.	RJC Policy and Procedure document (Doc. No. RAG-RJC-001)	03-Mar-25	Low Risk
Use the toolkit to review human rights risks with business partners and in challenging situations.								
Business Partners (COP 5)	8	The business expects respect for human rights from its significant Business Partners.		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.	RJC Policy and Procedure document (Doc. No. RAG-RJC-001)	03-Mar-25	Low Risk

Business Partners (COP 5) <ul style="list-style-type: none"> • Right to a safe and healthy work environment • Right to rest and leisure 	9	If orders are placed to suppliers with very tight deadlines, the business has considered potential human rights 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.	RJC Policy and Procedure document (Doc. No. RAG-RJC-001)	03-Mar-25	Low Risk
Business Partners (COP 5)	10	The business knows how it will respond in the event that it becomes aware that a Business Partner is not respecting human rights.		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.	RJC Policy and Procedure document (Doc. No. RAG-RJC-001)	03-Mar-25	Low Risk
Conflict-Affected Areas (COP 6.2) <ul style="list-style-type: none"> • 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 	11	If operating or planning to operate in a conflict-affected area, the business has formally assessed the heightened human rights risks.		Not Applicable	Please document the reason for the Not Applicable Response.	Not Applicable	Not Applicable	The company is not operating in conflicted area.
Conflict-Affected Areas (COP 6.2) <ul style="list-style-type: none"> • 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 	12	If sourcing diamonds, gold or platinum group metals directly from conflicted areas, the business has formally assessed the heightened human rights risks.		Not Known	Establish an action plan to gather more information about whether this Human Rights issue is relevant to the business.	Not Applicable	Not Applicable	The company is not operating in conflicted area.
Conflict-Affected Areas (COP 6.2) <ul style="list-style-type: none"> • 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 	13	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.		Not Applicable	Please document the reason for the Not Applicable Response.	Not Applicable	Not Applicable	The company is not operating in conflicted area.
Sourcing from Artisanal and Small-Scale Mining (ASM) (COP 7) <ul style="list-style-type: none"> • 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 • Abolition of forced labour 	14	If sourcing diamonds, gold or platinum group metals directly from ASM, the business checks that the ASM: <ul style="list-style-type: none"> • has controls to prevent the use of forced labour and worst forms of child labour • has work place health & safety practices which protect the wellbeing of its employees and contractors <ul style="list-style-type: none"> • uses mercury in a controlled, safe and environmentally acceptable manner • controls for other significant environmental impacts 		Not Applicable	Please document the reason for the Not Applicable Response.	Not Applicable	Not Applicable	The company is not operating in conflicted area.

Sourcing from Artisanal and Small-Scale Mining (ASM) (COP 7) <ul style="list-style-type: none"> • 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 • Abolition of forced labour 	15	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.		Not Applicable	Please document the reason for the Not Applicable Response.	Not Applicable	Not Applicable	The company is not operating in conflicte affected area.
Security (COP 11) <ul style="list-style-type: none"> • Right to privacy • Right to life, liberty and security of the person • Freedom from degrading treatment • Right of peaceful assembly • Right to non-discrimination 	16	If the Member uses security service providers, respect for human rights is expected and supported in accordance with the Code of Practices.		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.	RJC Policy and Procedure document (Doc. No. RAG-RJC-001)	03-Mar-25	Low Risk
Supply chain-specific risks	17	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.		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.	RJC Policy and Procedure document (Doc. No. RAG-RJC-001)	03-Mar-25	Low Risk
Consider how well human rights considerations have been integrated in business systems.								
Legal Compliance (COP 1)	18	Systems for awareness and compliance with Applicable Law include coverage of human rights areas in this Toolkit.		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.	RJC Policy and Procedure document (Doc. No. RAG-RJC-001)	03-Mar-25	Low Risk
Policy and Implementation (COP 2)	19	Senior management's review of the ongoing suitability and adequacy of the Member's business practices includes consideration of human rights risks .		Broadly managed		RJC Policy and Procedure document (Doc. No. RAG-RJC-001)	03-Mar-25	Low Risk
Reporting (COP 3)	20	Communication to stakeholders includes reference to your general approach to addressing human rights 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.	RJC Policy and Procedure document (Doc. No. RAG-RJC-001)	03-Mar-25	Low Risk