

# OECD and Due Diligence

## Annual Report

2025

### Company Detail

<b>Name</b>	Ten Fingers Factory and Design Co., Ltd.
<b>Location</b>	287/35-38 Surawong Road Suriyawong Bangrak Bangkok Thailand 10500
<b>Reporting Date</b>	12 September 2025
<b>Reporting Period</b>	January to August 2025

**Ten Fingers Factory and Design Co., Ltd.** is committed to conducting business responsibly and sustainably in accordance with the highest international standards of the jewelry industry. This report has been prepared to demonstrate our dedication to fully and transparently implementing the Responsible Jewellery Council (RJC) Code of Practices 2025.

We believe that business growth must go hand in hand with creating positive impacts on society, the environment, and good governance. In this report, you will find details of the measures we have implemented across various areas, aligned with the core provisions of the RJC Code of Practices. This ensures that every step of our operations adheres to principles of responsibility and ethics.

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## **Step 1: Establish Strong Company Management Systems**

**Ten Fingers Factory and Design Co., Ltd.** has adopted a formal policy on due diligence for supply chains of diamonds, rubies, sapphires, emeralds, platinum group metals (PGMs), silver, and gold. This policy is aligned with the model set out in Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains. It reflects the company's commitment to responsible sourcing and the avoidance of materials associated with human rights abuses, illegal trade, or conflict financing.

To support the implementation of this policy, the company has established an internal management structure. Company is appointed Compliance Officer and Manager, has been appointed to oversee the due diligence process. She reports directly to the company's director, ensuring that due diligence activities are integrated into the company's overall governance framework and are conducted with full management oversight.

The company has also established an internal system of controls and transparency to manage and monitor its supply chains. This includes maintaining full documentation before proceeding with any transactions involving the listed minerals and gemstones. Supplier due diligence is conducted to ensure that business partners operate transparently and meet ethical standards. Traceability is ensured through verification processes and documentation that track materials and identify upstream suppliers. The company's Supply Chain Policy and Code of Conduct are communicated to all suppliers, who are required to acknowledge and comply with them.

The company maintains active engagement with its suppliers. Written agreements with suppliers include clauses referencing compliance with the company's Supply Chain Policy. The company also verifies the authenticity of documents submitted by suppliers regarding the origin of materials and follows up with suppliers annually as part of its ongoing due diligence and risk monitoring efforts.

In addition to supplier engagement, the company has developed a company-wide communication system to encourage employee participation in identifying potential risks.

Employees are informed about supply chain risks and due diligence expectations through internal communication channels. They are encouraged to report any concerns or observations related to supply chain integrity directly to management or via the grievance mechanism.

## **Step 2: Identify and Assess Risks in the Supply Chain**

The company has established a structured process to identify and assess risks within its supply chain, in alignment with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. The company has documented its risk assessment procedures and criteria based on OECD guidance, and these are applied systematically to all suppliers involved in the sourcing of diamonds, rubies, sapphires, emeralds, PGMs, silver, and gold.

Due diligence is conducted prior to entering into any business relationship to ensure that sourced materials are conflict-free and legally obtained. Throughout the duration of the relationship, the company continues to perform scrutiny and monitoring of supplier transactions to detect any potential risk signals. The company's risk assessment framework allows it to evaluate the origin of materials, the transparency of the supply chain, and compliance with relevant international standards, such as the Kimberley Process Certification Scheme and the Responsible Jewellery Council (RJC) Code of Practices.

All suppliers are required to provide proper documentation and information concerning the origin and legitimacy of their materials. This includes details necessary to verify that the diamonds, colored stones, precious metals, and other materials supplied are ethically sourced and do not contribute to human rights violations or conflict financing.

As of the latest review, no red flags have been identified, and none of the company's suppliers are currently classified as high-risk. The company maintains continuous monitoring to ensure that any emerging risk factors can be promptly addressed through established due diligence and mitigation mechanisms.

## **Step 3: Design and Implement a Strategy to Respond to Identified Risks**

The company's risk assessment process is formally reviewed and approved by senior management to ensure it reflects both ethical commitments and legal compliance requirements.

When a red flag is identified, such as a high-risk supplier, unclear origin of materials, or potential human rights violations, the company follows a structured management system to respond effectively. This system includes a documented action plan describing the steps for risk mitigation, engagement with the supplier to request clarification or corrective action, temporary suspension of transactions where necessary, and termination of business relationships in cases of serious or unresolved violations.

The company's approach follows the OECD Due Diligence Guidance and is designed to promote continuous improvement, transparency, and responsible decision-making across the supply chain.

#### **Step 4: Carry Out an Independent Third-Party Audit of Due Diligence**

At present, the company has not arranged for an independent third-party audit of our supply chain due diligence. This is because no red flags have been identified, and none of our suppliers have been classified as high-risk based on the results of our internal risk assessments. The company continues to monitor supplier activities closely and maintains readiness to commission an external audit should any risks emerge or if stakeholder expectations or customer requirements change in the future.

#### **Step 5: Publicly Report on Supply Chain Due Diligence**

The company promotes transparency by making its supply chain due diligence report accessible to all interested stakeholders. The report is published on the company's website and can also be shared directly via email with business partners, clients, and certification bodies upon request.

**For additional comments or feedback regarding this report, stakeholders may contact:**

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