



CLYDE DUNEIER

BRILLIANT SINCE 1910

50 West 47th St. Suite 310, New York, NY 10036 | 212-398-1122

OECD Annual Reporting

Company Name:	Clyde Duneier, Inc.
Date:	January 25, 2024
Reporting period:	2024
OECD Due Diligence Guidance	Action taken
Step 1: Establish strong company management 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.	Supply chain policy sent to all suppliers and customers, as well as posted on company website. Policy includes all regulations dealing with OECD's and CAHRA's.
1.B Structure internal management systems to support supply chain due diligence.	Jemma Kim manages the internal supply chain and makes final decisions if any issues have arisen.
1.C Establish a system of controls and transparency over the minerals supply chain.	All suppliers must complete a KYC and also list sourcing origins for product supplied to Clyde Duneier, Inc. In addition, suppliers must complete Supplier conformance documents, following RJC guidelines, thereby supplier agrees to required sourcing protocols. Diamond invoices must contain System of Warranties.
1.D Strengthen company engagement with suppliers.	Supplier pamphlet recommends our suppliers continue up the supply chain to have their suppliers agree and establish similar protocols that we have established based on RJC. Our supply chain protocols include ability to work with any suppliers with infractions to adjust to our standards. RJC certification is on our emails and website, promoting the ideals of RJC.
1.E Establish a company-level, or industry wide, grievance mechanism as an early warning risk-awareness system.	Grievance mechanism has been established and is posted online and in the office.
Step 2: Identify and assess risk in the supply chain	
Identify and assess risks in the supply chain and assess risks of adverse impacts.	Risk reviews have been conducted on our supply chain relating to all aspects of the business model. No red flags have been identified this year. Precautions are in place to identify any LGD's from suppliers who sell natural and LGD's.
Step 3: Design and implement a strategy to respond to identified risks (if applicable)	

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Report findings of the supply chain risk assessment to the designated senior management of the company.	Jemma Kim is responsible for dealing with any red flags in our risk assessments. No red flags identified.
Devise and adopt a risk management plan.	Risk protocols are documented to identify any red flags and what would happen if red flags are found.
Implement the risk management plan and monitor performance of risk mitigation efforts.	No red flags found at this time.
Internal training	Staff training was conducted on Supply chain procedures and establishing new suppliers.
Communications	Yearly report sent to stakeholders and posted online to update on policies and if any red flags have been identified that have not been corrected.
OPTIONAL INFORMATION ON Step 4: Carry out independent third-party audit	
RJC COP audit	COP audits were conducted in 2016 & 2019 and received full three-year certifications. COP 19 audit took place January 2023 and a full 3-year certification was received.
Grievances and remediation	No grievances reported.

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