



K's Jewellery & Co.®

100% EXPORT ORIENTED UNIT
MANUFACTURERS & EXPORTERS OF FINE JEWELLERY

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Gold Management Procedure

Summary

This procedure describes how K's Jewellery & Co. is tracking the gold for the provenance claim about non-conflict gold and that the jewelry complies with the requirements of the Dodd Frank Act for Conflict Free Gold

1. Objective

The goal of this procedure is to ensure that the gold is tracked through the company from procurement to Jewellery dispatch and there is no mix up in non-conflict gold with any other gold.

2. Principle

Conflict-Free Gold

Products are considered "conflict-free" under Dodd-Frank Act and SRSP if they do not contain minerals that directly or indirectly finance or benefit armed groups in the "covered countries:" the Democratic Republic of the Congo, Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.

3. Purpose

To ensure that the gold used in the jewelry is conflict-free / complies to Dodd Fran Act and it is Conflict-Free.

4. Documents

Dodd Frank Act

5.0 Procedure

The procedure for tracking and managing gold and jewellery through the company's manufacture and refining processes.

5.1 Gold

The gold bars are procured from Banks & RBI Nominated Agency for supply of Gold to Manufactures ie. Diamond India Limited. At the time of purchase, it should be ensured that the gold Bullion is from a Refinery that is on the LBMA Good Delivery list. Obtain a certificate from the Bank selling the Gold Bullion that the gold is conflict free.

5.2 Gold Control

The gold control shall receive the gold from the bank and record the stocks. The records of the gold issued and received from different departments like Casting, Production and Refiners shall be maintained to ensure that the quantity of the gold on system and the physical quantity always Tallies



5.3 Casting

The casting department shall give the gold account to the gold control for the conflict free gold received and the addition of alloys as well as the casting, sprue and the dust weight. Casting department shall not add any other gold from any other source.

5.4 Production

The production department must ensure that they use the gold castings and other gold wires etc. that are supplied by the Gold Control. No outside gold shall be used in the production process

5.5 Solder and Wires

All the solder and wires shall be drawn from the non-conflict gold and it shall be recorded in the gold control.

5.6 Findings

All the findings procured shall be from conflict free gold and the Purchase Invoice shall bear the declaration of Conflict-Free Gold as required by Dodd Frank Act

5.7 Refinery

All the gold dust received by the refinery shall be recorded and the gold after refining the dust shall be returned to Gold Control. The alloys, sprue and rejected castings received for refining shall be returned to Gold Control. No gold from any other source shall be taken and mixed during the refining.

5.8 Sale of Jewelry

The jewellery sold by the company shall be made from conflict-free gold as per this procedure and the gold tracking through the factory. The sales invoice shall have the provenance claim declaration of Conflict-free gold

5.9 General Conditions

All the gold used in the manufacturing process is from Banks only. SEEPZ is a Controlled area and no other gold from any other source is mixed in the Gold Bullion that is received from Banks and is Conflict-free.

5.10 Statement on Provenance Claim

- To our best knowledge, and/or written assurance from our suppliers, The Seller states that diamonds have not been obtained in violation and / or sanctions by the US departments of Treasuries office of foreign assets control (OFAC) and have not been originated from the MBADA and Marange resources of Zimbabwe.
- To the Best of our knowledge and / or written assurance from our suppliers, we state that Diamonds are in compliance with the relevant WFDB charter. The Seller has synthetic diamond testing technology and all the diamonds are checked in the testing machines for the surety of natural diamonds.



- The Seller warrants that any products containing Gold have been supplied in compliance with Conflict free Minerals Sourcing Protocols as per the Wall Street Reform and Consumer Protection (Dodd-Frank) Act, 2011.
- Recycled Gold Jewellery supplied by K's Jewellery & Co. is made from recycled gold sourced directly from suppliers.

5.10 Recycled Gold

- All recycled gold is purchased from recycled gold refiner ie. Sam Precious Metals (**Diamond India Limited**) with proper COC transfer documents.
- The company maintained the traceability of recycled gold jewellery manufactured.



The London Bullion Market Association Refiners

LBMA accredited gold refiners who are on the current Good Delivery List.

Allgemeine Gold - und Silberscheideanstalt AG

First Listing of Refinery: 08/04/2008

Refinery Location: Pforzheim

Almalyk Mining and Metallurgical Complex (AMMC)

First Listing of Refinery: 28/10/1997

Refinery Location: Almalyk

AngloGold Ashanti Mineração Ltda

First Listing of Refinery: 21/03/1986

Refinery Location: Nova Lima

Argor-Heraeus SA

First Listing of Refinery: 28/08/1961

Refinery Location: Mendrisio

Asahi Pretec Corp

First Listing of Refinery: 12/09/2008

Refinery Location: Kobe City

Atasay Kuyumculuk Sanayi Ve Ticaret A.S.

First Listing of Refinery: 07/05/2010

Refinery Location: Istanbul

Aurubis AG (formerly Norddeutsche Affinerie AG)

First Listing of Refinery: Pre 1934

Refinery Location: Hamburg



Bangko Sentral ng Pilipinas (Central Bank of the Philippines)

First Listing of Refinery: 06/09/1979

Refinery Location: Quezon City

Boliden Commercial AB

First Listing of Refinery: 01/01/1984

Refinery Location: Skelleftehamn

C. Hafner GmbH + Co. KG

First Listing of Refinery: 08/03/2013

Refinery Location: Pforzheim 3

CCR Refinery - Glencore Canada Corporation

First Listing of Refinery: ~1956

Refinery Location: Montreal

Cendres + Métaux SA

First Listing of Refinery: 20/05/1981

Refinery Location: Biel-Bienne

Chimet S.p.A.

First Listing of Refinery: 27/07/1996

Refinery Location: Arezzo

Great Wall Precious Metals Co., LTD. of CBPM

First Listing of Refinery: 02/10/1961

Refinery Location: Chengdu

Heimerle + Meule GmbH

First Listing of Refinery: 03/06/2014

Refinery Location: Pforzheim

Heraeus Ltd Hong Kong

First Listing of Refinery: 23/01/2006

Refinery Location: Fanling



Heraeus Precious Metals GmbH & Co. KG

First Listing of Refinery: 15/07/1958

Refinery Location: Hanau

Inner Mongolia Qiankun Gold and Silver Refinery Share Company Ltd

First Listing of Refinery: 01/12/1999

Refinery Location: Huhhot

Ishifuku Metal Industry Co Ltd

First Listing of Refinery: 30/06/1982

Refinery Location: Soka Saitama

Istanbul Gold Refinery

First Listing of Refinery: 08/12/2011

Refinery Location: Kuyumcukent

Japan Mint

First Listing of Refinery: 13/12/2007

Refinery Location: Osaka

Jiangxi Copper Company Ltd

First Listing of Refinery: 30/09/2005

Refinery Location: Guixi City

Johnson Matthey Gold and Silver Refining Inc.

First Listing of Refinery: 23/05/1989

Refinery Location: Salt Lake City

Johnson Matthey Ltd

First Listing of Refinery: 15/06/1961

Refinery Location: Brampton



JSC 'Ekaterinburg Non-Ferrous Metals Processing Plant'

First Listing of Refinery: 11/01/1999

Refinery Location: Verkhnyaya Pyshma2

JSC Uralelectromed

First Listing of Refinery: 30/06/2006

Refinery Location: Verkhnyaya Pyshma

JX Nippon Mining & Metals Co., Ltd

First Listing of Refinery: 03/05/2000

Refinery Location: Saganoseki

Kazzinc Ltd

First Listing of Refinery: 20/06/1996

Refinery Location: Ust-Kamenogorsk

Kennecott Utah Copper LLC

First Listing of Refinery: 22/04/2014

Refinery Location: Magna

Kyrgyzaltyn JSC

First Listing of Refinery: 27/10/1999

Refinery Location: Karabalta

L'azurde Company for Jewelry

First Listing of Refinery: 01/06/2010

Refinery Location: Riyadh

LS Nikko Copper Inc

First Listing of Refinery: 20/05/1994

Refinery Location: Onsan (1)



Matsuda Sangyo Co., Ltd

First Listing of Refinery: 11/01/2000

Refinery Location: Iruma

Metalor Technologies (Hong Kong) Ltd

First Listing of Refinery: 15/08/2001

Refinery Location: Kwai Chung

Metalor Technologies SA

First Listing of Refinery: Pre 1934

Refinery Location: Marin

Metalor Technologies Singapore Pte Ltd

First Listing of Refinery: 17/07/2014

Refinery Location: Singapore City

Metalor USA Refining Corp.

First Listing of Refinery: 01/01/1987

Refinery Location: North Attleboro

METALÚRGICA MET-MEX PEÑALES, S.A. DE C.V

First Listing of Refinery: 22/11/1991

Refinery Location: Torreon

Mitsubishi Materials Corp.

First Listing of Refinery: 20/05/1981

Refinery Location: Naoshima

Mitsui Mining & Smelting Co., Ltd

First Listing of Refinery: 20/05/1981

Refinery Location: Takehara



MMTC-PAMP India Pvt. Ltd

First Listing of Refinery: 16/05/2014

Refinery Location: Mewat

Moscow Special Alloys Processing Plant

First Listing of Refinery: 11/05/2007

Refinery Location: Moscow

Nadir Metal Rafineri San. Ve Tic. A.Ş.

First Listing of Refinery: 08/12/2011

Refinery Location: Bahçelievler

Navoi Mining and Metallurgical Combinat (NMMC)

First Listing of Refinery: 17/10/1994

Refinery Location: Navoi

Nihon Material Co., Ltd

First Listing of Refinery: 19/12/2013

Refinery Location: Noda-City

Ohio Precious Metals, LLC

First Listing of Refinery: 19/12/2013

Refinery Location: Jackson

OJSC Kolyma Refinery

First Listing of Refinery: 17/09/2004

Refinery Location: Khasyn

OJSC Krastsvetmet

First Listing of Refinery: 29/11/1999

Refinery Location: Krasnoyarsk



OJSC Novosibirsk Refinery

First Listing of Refinery: 11/01/1999

Refinery Location: Novosibirsk

Pamp SA

First Listing of Refinery: 10/06/1987

Refinery Location: Castel San Pietro

Prioksky Plant of Non-Ferrous Metals

First Listing of Refinery: 29/11/1999

Refinery Location: Kasimov

PT Aneka Tambang (Persero) Tbk (Logam Mulia)

First Listing of Refinery: 01/01/1999

Refinery Location: Jakarta

PX Précinox SA

First Listing of Refinery: 24/01/2012

Refinery Location: La Chaux-de-Fonds

Rand Refinery (Pty) Ltd

First Listing of Refinery: ~1921

Refinery Location: Germiston

Republic Metals Corporation

First Listing of Refinery: 17/02/2014

Refinery Location: Miami

Royal Canadian Mint

First Listing of Refinery: ~1919

Refinery Location: Ottawa



Schöne Edelmetaal B.V.

First Listing of Refinery: Pre 1934

Refinery Location: Amsterdam

Sempsa Joyeria Plateria SA

First Listing of Refinery: 01/01/1984

Refinery Location: Madrid

Shandong Zhaojin Gold and Silver Refinery Co. Ltd

First Listing of Refinery: 31/12/2007

Refinery Location: Zhaoyuan City

Sichuan Tianze Precious Metals Co., Ltd

First Listing of Refinery: 26/03/2013

Refinery Location: Chengdu 2

SOE Shyolkovsky Factory of Secondary Precious Metals

First Listing of Refinery: 27/10/1999

Refinery Location: Shyolkovo

Solar Applied Materials Technology Corp.

First Listing of Refinery: 25/02/2010

Refinery Location: Danong Village

Sumitomo Metal Mining Co., Ltd

First Listing of Refinery: 17/06/1981

Refinery Location: Toyo, Saijo

T.C.A S.p.A

First Listing of Refinery: 12/08/2014

Refinery Location: Capolona



Tanaka Kikinzoku Kogyo K.K.

First Listing of Refinery: 07/09/1978

Refinery Location: Hiratsuka

The Refinery of Shandong Gold Mining Co., Ltd

First Listing of Refinery: 14/01/2010

Refinery Location: Laizhou City

Tokuriki Honten Co., Ltd

First Listing of Refinery: 02/07/1981

Refinery Location: Kuki

Umicore Brasil Ltda

First Listing of Refinery: 11/12/1992

Refinery Location: Guarulhos

Umicore SA Business Unit Precious Metals Refining

First Listing of Refinery: ~1930

Refinery Location: Hoboken

Valcambi S.A.

First Listing of Refinery: 20/05/1968

Refinery Location: Balerna

Western Australian Mint (T/a The Perth Mint)

First Listing of Refinery: 24/01/2003

Refinery Location: Newburn

Zhongyuan Gold Smelter of Zhongjin Gold Corporation

First Listing of Refinery: 28/03/2006

Refinery Location: Sanmenxia City



Zijin Mining Group Co. Ltd

First Listing of Refinery: 31/03/2006

Refinery Location: Shanghang

For K'S JEWELLERY & CO.

Agnes A
Partner

Man

