



## OECD Annual Reporting

<b>Company Name:</b>	Leo Wolleman, Inc.
<b>Date:</b>	April 4, 2024
<b>Reporting period:</b>	Jan-April 2024
<b>OECD Due Diligence Guidance</b>	<b>Action taken</b>
<b>Step 1: Establish strong company management systems</b>	
<b>1.A</b> 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.
<b>1.B</b> Structure internal management systems to support supply chain due diligence.	David Stein and Ken Gurny manage the internal supply chain and make final decisions if any issues have arisen.
<b>1.C</b> Establish a system of controls and transparency over the minerals supply chain.	All suppliers must complete and KYC and also list sourcing origins for product supplied to Leo Wolleman, 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.
<b>1.D</b> 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.
<b>1.E</b> 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.
<b>Step 2: Identify and assess risk in the supply chain</b>	
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 CVD's from suppliers who sell natural and CVD's.
<b>Step 3: Design and implement a strategy to respond to identified risks (if applicable)</b>	
Report findings of the supply chain risk assessment to the designated senior management of the company.	David Stein and Ken Gurny are 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.
<b>OPTIONAL INFORMATION ON Step 4: Carry out independent third-party audit</b>	
RJC COP audit	COP 19 audit to take place in June 2024 for initial certification.
Grievances and remediation	No grievances reported.