



GRIEVANCE MECHANISM

Effective September 26, 2025

Omega Jewelry Casting LLC has established this grievance procedure to hear concerns about circumstances in the supply chain involving precious metals from conflict-affected and high-risk areas.

This mechanism aims to ensure that both internal (employee-related) and external (interested party-related) grievances are addressed promptly, fairly, and transparently, while safeguarding the rights and confidentiality of the complainant.

RJC Compliance Officer is responsible for implementing and reviewing this procedure. Concerns can be raised by interested parties via email or telephone to:

Name	Anthony Platania
Telephone	+1 (516) 497-8683
Email address	Anthony@omegajc.com

Grievance Handling Process

Upon receiving a complaint, the company will:

1. Receive and Register Complaint

- Log the complaint in the **Grievance Register**.
- Assign a unique grievance number.
- Acknowledge receipt within **3 working days**.

2. Understand and Clarify

- Obtain an accurate and complete report of the complaint.
- Explain the grievance procedure to the complainant.
- Ask how the complainant would prefer the grievance to be handled or resolved.

3. Eligibility and Responsibility Assessment

- Assess whether the grievance is within the scope of the company's control and responsibility.



- If the grievance cannot be addressed internally (e.g. the company is too far removed from the issue), it will be redirected to a more appropriate party, such as a relevant supplier, partner, or industry body.
- If it falls within our scope, assign it to the **Grievance Committee** for investigation.

4. Investigation and Fact-Finding

- Gather further information where necessary.
- Hear all parties involved in the matter, maintaining neutrality and confidentiality.
- Identify and document any required corrective or preventive actions.
- Monitor the situation as needed to prevent recurrence.

5. Resolution and Communication

- Decide on resolution actions within **30 working days**, where feasible.
- Communicate the decision and rationale to the complainant.
- Offer an appeal option if the complainant is unsatisfied with the outcome.

6. Documentation and Monitoring

- Maintain detailed records of the complaint, investigation process, actions taken, and resolution.
- Records shall be stored securely and retained for at least **five years**.
- Review grievance trends periodically to strengthen internal systems and practices.

Grievance Committee

The company shall form a **Grievance Committee** responsible for internal grievance redressal and major external issues. It shall include:

- **Chairperson** – Senior Management
- **HR** – Internal process management
- **Legal/Compliance Officer** – Regulatory or external complaint handling
- **Neutral Member** – From another department



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- **External Member** – Optional for high-risk or sensitive matters

The committee must uphold impartiality, fairness, and gender diversity.

Appeals Process

If dissatisfied with the outcome, the complainant may appeal in writing within **7 working days**. The appeal will be reviewed by senior management or an external reviewer (if needed), with a final decision provided within **15 working days**.