



OECD Due diligence reporting 2022

Company Name:	Moragen Co.,Ltd.
Date:	28 November 2022
Reporting period:	March 2022 to November 2022

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.	The company set up RJC – COP manual which the written of OECD steps and all of policies that RJC-COP required. This policies are communicate to supplier by e-mail and manual with the KYC process. All policies and OECD steps in this manual are adopted by the Managing Director of Moragen Co.,Ltd.
1.B Structure internal management systems to support supply chain due diligence.	The company assigned Ms.Pooncharat Puntong as responsible person for the due diligence process such as sending the KYC form, Evaluate the suppliers for risk assessment and consider for red-flag suppliers. But in this period they are no red-flag suppliers.
1.C Establish a system of controls and transparency over the minerals supply chain.	In the manual, all of our suppliers will identifying them self (KYC). They should not sourcing materials such a gold, silver, PGM, Diamonds, Gemstone from conflict affected and high risk area. They should have all original guarantee. All of data that the supplier sending is use to for evaluate the risk in due diligence process and keeping.
1.D Strengthen company engagement with suppliers.	The company sending the letters to suppliers ask the suppliers to engage with Moragen Co.,Ltd. to promote RJC that they accepted and request them to fill in KYC form and give the company the essential data of sourcing material and the human rights respect issued.
1.E Establish a company-level, or industry wide, grievance mechanism as an early warning risk-awareness system.	The company having grievance mechanism process we sending it to suppliers and all stakeholder. That ware Ms.Pooncharat Puntong is a responsible person.



MORAGEN CO.,LTD.

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Step 2: Identify and assess risk in the supply chain

Identify and assess risks in the supply chain and assess risks of adverse impacts.

We have the KYC to identify the suppliers to be legitimate. The suppliers the give the data for all of policies in COP-RJC. And the sourcing come from many country. All sourcing data are answer as the questionnaire. And All the data will having risk assessment by the scoring system. Opportunity and Impact would be consider for the risk level in high or low risk or critical risk. After that they will checked the country origin and supplier name not in the list of Anti Money Laundry Organization. (AMLO-Thailand) which is the high risks.

Step 3: Design and implement a strategy to respond to identified risks (if applicable)

Report findings of the supply chain risk assessment to the designated senior management of the company.

Managing Director.

Devise and adopt a risk management plan.

If they have low risk we should development the relations to promote RJC. If there is a high risk the company should ask the supplier for mitigate and remedy process. But If they is a critical high risk the company should give the supplier red-flag. That mean no transactions with them. This all are policies and adopted.

Implement the risk management plan and monitor performance of risk mitigation efforts.

We have grievance mechanism that all stakeholder can rise up the issued for company to consider and monitor performance of risk mitigation.

Internal training

All of the employee are trained about the COP-RJC.

Communications

We advised the suppliers and other stakeholders that we are the membership of RJC and communicate the information all issued of COP-RJC to all stakeholder.

OPTIONAL INFORMATION ON Step 4: Carry out independent third-party audit

RJC COP audit

The company during the RJC-COP audit.

Grievances and remediation

We have grievance mechanism for all stakeholder if they have concern, they should complaint by the grievance mechanism process.

Ref.

<https://www.amlo.go.th/dpl/>

<https://www.amlo.go.th/index.php/th/2016-05-04-04-48-38/risk-countrie>

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