GEMFAIR™

GemFair Response to SGS's 2026 Independent Third-Party Assessment

Context

In February 2026, GemFair engaged SGS United Kingdom Limited to conduct an independent third-party limited assurance assessment of GemFair's due diligence management system against the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. The assessment covered the period from 1 April 2025 to 31 March 2026 and followed GemFair's previous third-party assessment, which concluded in April 2025.

The assessment examined how GemFair's management system supports the principles and five-step framework of the OECD Due Diligence Guidance. This included:

- reviewing GemFair's due diligence management system self-assessment, screening reports, internal memoranda, policies and procedures, and mine-site corrective action plans;
- reviewing documentation and visiting a sample of Active and Relicensing GemFair ASM Member sites, including sites that had joined the programme since the previous assessment and any other sites of interest identified by GemFair or SGS;
- consulting GemFair buying, operations and management personnel about their roles, their understanding of the GemFair ASM Assurance Programme, and any implementation challenges; and
- reporting on the alignment of GemFair's management system with the OECD five-step due diligence framework and identifying opportunities for further improvement.

SGS concluded that, in all material respects, GemFair's Assurance Programme demonstrates alignment with the OECD five-step due diligence framework and represents a credible approach to responsible sourcing from the artisanal and small-scale mining sector in Sierra Leone.

The assessment recognised strengths in GemFair's approach to risk identification and management, traceability, mine-site monitoring and community engagement. It also noted that GemFair's controls identified red-flag indicators during the assessment period, which were managed through suspension, termination and corrective action processes in accordance with the programme's requirements.

One specific opportunity for improvement was identified relating to the consistency and level of detail captured through incident and accident reporting. SGS recommended strengthening the structure and consistency of data capture to support better analysis of trends, contributing factors and the effectiveness of existing controls. GemFair's response and planned actions are set out below.

IMPROVEMENT OPPORTUNITY	AUDITOR'S RECOMMENDATION	GEMFAIR RESPONSE
Incident and accident reporting processes		
Incident and accident reporting processes	While reporting processes are in place, the level of detail recorded is variable. Strengthening the structure and consistency of data capture would support improved analysis of trends and effectiveness of controls.	GemFair acknowledges the observation regarding variability in the level of detail recorded through incident and accident reporting processes. GemFair's ASM Standard requires Members to maintain site-level logbooks, including the recording of safety-related incidents, injuries and remedial actions. These records are reviewed during GemFair site visits and form part of GemFair's ongoing monitoring and assessment processes. GemFair also requires Members to establish and communicate basic accident and emergency procedures on-site and promotes a Safety-First culture through training and regular field engagement. Recognising the operational realities of artisanal and small-scale mining, GemFair applies a proportionate and risk-based approach to data collection and monitoring. In response to the auditor's observation, GemFair will strengthen the consistency of incident and accident data capture within existing logbook and site-monitoring processes, with an initial focus on Core Member sites where oversight and engagement are strongest. GemFair will also reinforce incident-reporting requirements through Standards training and ongoing field engagement. These actions will support more consistent recordings of incidents, contributing factors and remedial actions, helping GemFair to identify trends and assess the effectiveness of existing controls while maintaining an approach appropriate to the ASM operating context.