



## **RJC Code of Practices 2013**

## **Provenance Claims**

**Training Module Update November 2014** 



## **Introduction and Agenda**

#### Introduction to the Provenance Claims Provision

- i. Summary of the provision
- ii. When is it applicable?

#### Provenance Claims as part of the COP audit:

- vii. Bolt-on Module and Making claims Post-certification
- viii. Provenance Claims on the RJC Certification document

#### In-depth:

- xi. Conflict-free Claims
- xii. Synthetic-free Claims

#### Answers to Frequently Asked Questions:

- xi. Manufacturing
- xii. Conflict-free Gold
- xiii. Level of detail required

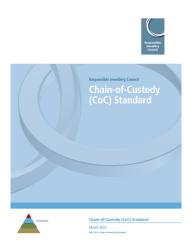




New provision, part of the Responsible Supply Chains & Human Rights section of the Code of Practices

Consultations during the 2012–13 COP Review raised concerns about lack of a provision addressing the validity of claims about provenance, where these are outside of the Chain of Custody Standard.











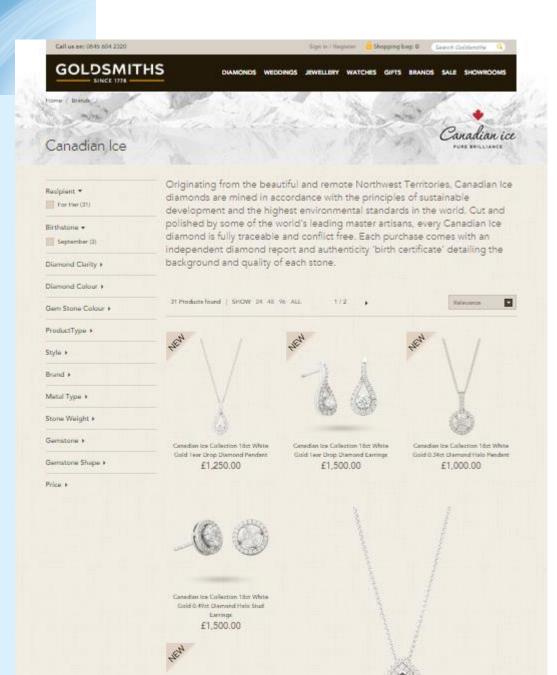
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#### Definitions and applicability

A **Provenance Claim** is a documented claim, made through the use of descriptions or symbols, relating to Diamonds, Synthetics, Gold and/or Platinum Group Metals that are offered for sale, whether as stand-alone materials or set in jewellery, and specifically relate to their:

- Origin Geographical origin of material, for example country, region, mine or corporate ownership of the Mining Facility/ies; and/or
- Source Type of source, for example recycled, mined, artisanally mined, or date of production; and/or
- Practices Specific practices applied in the supply chain relevant to the Code of Practices, including but not limited to, standards applicable to extraction, processing or manufacturing, conflict-free status, or due diligence towards sources.











www.responsiblejewellery.com



## **Provision Requirements**

#### 12. Provenance Claims

- 12.1 Members that make a Provenance Claim(s) shall have systems in place to ensure that the Provenance Claim(s) is valid and supported by evidence. The systems shall include:
- a)Documented criteria or requirements that are compatible with the Provenance Claim(s);
- b)Procedures for record keeping and verification that the criteria or requirements are met;
- c)Controls to maintain the integrity of the materials covered by the Provenance Claim(s);
- d)Training to ensure that employees who are responsible for responding to product inquiries understand the Provenance Claim(s) and can explain them accurately;
- e)A complaints or grievance mechanism appropriate to the nature, scale and impact of the business, to allow interested parties to voice concerns about the veracity of the Provenance Claim(s).





## Objective

Claims made about provenance are backed up with evidence

## Scope

 Required for all Members who make Provenance Claims

## Types of Claims

• Must be about origin, source or practices

## Implementatior

• Flexible - Member sets own criteria and process

#### Audit

 Auditor verifies systems are in place and compatible with the claim

## Reporting

 Applicability of the provision noted by the RJC in the Certification Information



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## **Provenance Claims, Post-Certification**

How does having your Provenance Claims audited for the RJC address the

- Signet Responsible Sourcing Protocol SRSP
- De Beers Best Practice Principles BPP

Understanding Bolt-ons and making a Provenance Claim after an audit

'Bolt-on' approach



## **Auditor Report to the RJC and Publication of Information**

Information on Provenance Claims (if applicable to the Member)	
Auditor Summary Report	Status of the information
1. Type of material (Gold, Diamonds, Synthetics, or Platinum Group Metals)	Part of the Member's Certification information on the RJC website
2. Type of claim (Origin, Source or Practices)	
3. Summary description of the criteria / requirements and the verification system used to support the claim	CONFIDENTIAL to the RJC



Responsible **Jewellery** Council

Responsible Jewelley Council

- Members - Aurum Holdings Ltd (Goldsmiths, Mappin & Webb, Watches of Switzerland)

## Aurum Holdings Ltd (Goldsmiths, Mappin & Webb, Watches of Switzerland) Bate Joined: 1,107 2009

http://www.aurumholdings.co.uk Website:

Head Office Location; Leicester, United Kingdom Membership Forum: Jewidlery retailer

#### Member Certificat on Information

#### Current Certification

Audit and Certification Scope Information: Download PDF Certification Number: 0000.0360

Certification Period: 30/05/2014 - 30/05/2017

#### Provious Certification

Audit and Certification Scope Information: Download PDF Certification Number: 0000 0011

**Certification Period:** 81/06/2011 - 81/06/2014

Press Releases: AURUM HOLDINGS LTD RE-CERTIFIED AGAINST NEW RJC CODE OF PRACTICES

#### Stope Sectors Raddo Wat fire Glexield With-Ward Wigston fari Shilton

#### Mempers

RETAILER

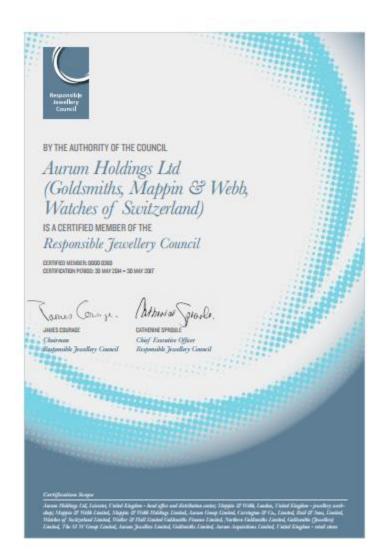
- · Diamond, gold and/or platinum group metals producer
- Diamond trader and/or cutter and polisher
- Gold and/or platinum group metals trader, refiner, hedger
- . Jewellery Manufacturer or Wholesaler
- · Josephery Statailor
- Service Industries
- Trade Associations

#### Supporters

RXC Supporters.

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RJC CERTIFICATION INFORMATION - CODE OF PRACTICES Summary  Responsible several processing to the country of the	
Certified Member	Aurum Holdings Ltd (Goldsmiths, Mappin & Webb, Watches of Switzerland)
Membership Forum	Jewellery Rotalier
Certification Number for this Certification	0000 0360
Certification Period	30 May 2014 – 30 May 2017
Audit Date	22-23 April 2014
Audit Type	Re-Certification
Previous Certifications	1
Applicable Standard	Code of Practices 2013
Accredited Auditor	SGS United Kingdom Limited Lead Auditor: Peter Warbrick Roshini Wickramasinghe
Certification Scope	Aurum Hoklings Ltd, Leicester, United Kingdom - head office and distribution contre; Mappin & Webb, London, United Kingdom - jewellery workshop; Mappin & Webb Limited, Mappin & Webb Holdings Limited, Aurum Group Limited, Carrington & Co., Limited, Reid & Sons, Limited, Watches of Switzerland Limited, Walker & Hall Limited Goldsmiths Finance Limited, Northern Goldsmiths Limited, Goldsmiths (levellers) Limited, The M W Group Limited, Aurum Jewellers Limited, Goldsmiths Limited, Aurum Acquisitions Limited, United Kingdom - retail stores



#### Applicable Provisions

- 1. General Requirements: 1-4
- 2. Responsible Supply Chains and Human Rights: 5, 6, 8-12
- 3. Labour Rights and Working Conditions: 13-20
- 4. Health, Safety and Environment: 21-25
- 5. Diamonds, Gold and Platinum Group Metals Products: 26, 27
- 6. Responsible Mining Sector:

#### Provenance Claims

The provenance claim of the exclusive "Canadian Ice" range for the Diamonds being fully traceable to the source mine has been verified. The provenance claim also includes the gold used for the rings within this range being fully traceable to the source mine, and this has been verified. However all other items in the range such as necklace chains and earrings are not included in the gold claim and the Member should ensure this information is reflected in the "Struck card" point of sale literature.

## Auditor Statement of Conformance

Based on the scope and findings of the Audit, the sites visited and the available information provided by the Member:



The Member has demonstrated a conformance level consistent with a 3 year Certification Period.



The Member has demonstrated a conformance level consistent with the transitional 1 year Certification Period for 1 year.



The Member is not eligible for RJC Certification due to having four consecutive 1 year Certification outcomes.



Critical breaches have been identified and the RJC Management Team should initiate disciplinary procedures.



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#### **Product Disclosure vs Provenance Claims**

#### **Product Disclosure**

- Applies to disclosure of factual information about the product that should be known by the seller
- Requirement under the COP for any product representations

#### **Provenance Claims**

- Applies to information established through Member or supplier claims and/or supply chain due diligence
- Requirement only if Members choose to make provenance claims



## **Provenance Claims and Due Diligence**

A Provenance Claim may involve the absence of certain attributes or conditions in the supply chain, such as:

- Conflict-Free Gold
- Synthetic-Free Diamonds

Verification of such claims will require supply chain Due Diligence

The Provenance Claims provision reduces the risks to the Member of making these types of claims by requiring the due diligence systems to be documented and audited



#### **Claims about Conflict-Free Gold**

- Broad, international concerns about the use of gold to fund conflict
- Several industry standard / initiatives in place aimed at due diligence systems for conflict-free assurance
- Requirements and verification systems will depend on where the company sits in the supply chain and the complexity of the supply chain
- Risk-based due diligence



## Conflict-Free Gold Claims, Implementation of Systems

#### Documented Criteria

• Define the verifiable criteria / requirements - e.g. supplies only from participants in certain recognized industry initiatives, refined before a certain date, known mines in non-conflict areas, etc.

#### **Procedures**

- Conduct risk-based due diligence of relevant suppliers
- Document how the verifications are carried out and by whom, and what happens if there are non-conformances

#### Controls

Document how the covered Gold is tracked while in inventory

#### Other

- Document training materials and maintain a register
- Establish a mechanism for parties to voice concerns about the claim and how complaints are investigated



## Provenance Claims, Due Diligence and Product Disclosure

'Natural diamonds' claims are not Provenance Claims: this is specifically excluded in the Standards Guidance.

- This can be considered 'factual' information that is 'known' through a confidence in the supply chain (like Product Disclosure)
- So examples of statement on invoices of 'natural and untreated' would not trigger a Provenance Claims audit for a Member

'Synthetic-free' type claims are emerging because of an erosion of confidence, hence more proactive screening processes etc being developed to check for deceptive mixing of goods.

- This can be considered 'information established through due diligence'. The Member is opting to (or being required to by a business partner) to carry out this due diligence
- So examples of statements such as 'no synthetic diamonds' would trigger a Provenance Claims audit under the COP. It is a positive claim based on testing of stones/parcels



## Claims about Natural vs Synthetic Diamonds

- Increasing threats / concerns in the trade about Synthetic
   Diamonds being passed off as natural Diamonds
- Natural Diamonds are not considered a Provenance Claim under the Code of Practices, however...
- The option is available for Members to make a "Synthetics-Free" claim and request that it be included in their Certification Scope
- The nature of the Provenance Claim will be included in the Member's Certification information on the RJC website
- Statement could be added to invoices that the claim conforms with the Provenance Claims provision of the RJC Code of Practices



## **Synthetic-Free Claims, Implementation of Systems**

#### Documented Criteria

- Claim must apply to 100% of covered Diamonds no mixed claims
- Define the verifiable requirements used to ensure the Diamonds are free of Synthetics

#### **Procedures**

- Conduct risk-based due diligence of relevant suppliers
- Document how the verifications are carried out and by whom, and what happens if there are non-conformances
- Records of results to be available for RJC auditor

#### Controls

- Document how the covered Diamonds are tracked while in inventory
- Formal procedures required if handled by contractors

#### Other

- Document training materials and maintain a register
- Establish a mechanism for parties to voice concerns about the claim and how complaints are investigated



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# Are manufacturing details included in the provision?



'All our jewellery is manufactured in Switzerland. Is this a Provenance Claim?'

If the claim is only about the jewellery design/manufacturing (including manufacturing location), then it's not a Provenance Claim under the RJC COP.

If the claim is or includes a claim about the gold itself coming from a specific area, then yes it's a Provenance Claim under the RJC COP.



## FAQs Recycled Gold

'We source recycled, as well as non-recycled gold. Can we make a recycled gold provenance claim?'

Yes, though you must be clear what is recycled and what is not, as well as clarify the percentage of recycled gold that is sourced, if known. In other words, if all gold comes from recycled sources and this is verifiable and auditable, then the claim is clear. If only a portion of the Member's gold is from recycled sources, this must be made clear in the claim to clients.



## FAQs How much detail is required?

'Would sourcing of conflict-free gold be considered a Provenance Claim?'

Yes, however it is useful to supply more information about the Provenance Claim, such as 'Sourcing of conflict-free gold from LBMA and RJC CoC refiners' or 'Sourcing of conflict-free gold according to the OECD Due Diligence Guidance', or 'Sourcing of conflict-free gold according to the Signet Responsible Sourcing Protocol' (or whatever applies).



#### Thank you for your attention

Any questions please contact: **training@responsiblejewellery.com** or visit our website at **http://www.responsiblejewellery.com/** 

