

## Frequently Asked Questions (FAQ's)

### Responsible Jewellery Council

### RJC Member Certification Code of Practices

Please contact  
[training@responsiblejewellery.com](mailto:training@responsiblejewellery.com)  
if you have any questions. [Click here](#)  
for the RJC Team Contacts on our  
website



Responsible  
Jewellery  
Council

Standards Guidance Document
<p>When working through the Code of Practices we recommend referring to the Standards Guidance Document. This will provide you with background information on each of the provisions in the Code of Practices and a Suggested Management Approach which provides suggestions on how to implement each of the provisions in the Code. You might also like to use these Suggested Management Approaches to review the current systems you have in place. The Standards Guidance Document is referred to frequently throughout this document and it can be downloaded here: <a href="http://www.responsiblejewellery.com/quick-downloads/rjc-certification-system-documents/">http://www.responsiblejewellery.com/quick-downloads/rjc-certification-system-documents/</a></p>
What is Applicable Law?
<p>This is the relevant national and/or state and/or local laws of the country or countries in which the Member operates. Compliance with the law is a fundamental requirement of RJC certification.</p>
Where can I find more information on the provisions of the Code of Practices?
<p>The RJC Standards Guidance document is like a library and provides general information and advice about each of the standards in the Code of Practices. This includes a suggested management approach to support conformance with each of the standards. The suggested approach generally includes:</p> <ul style="list-style-type: none"><li>• Risk assessment;</li><li>• Roles and Responsibilities;</li><li>• Written policies and procedures;</li><li>• Record keeping;</li><li>• Training.</li></ul> <p>These are only suggestions and Members may of course adopt different management approaches, appropriate to their own business and circumstances. The key is to have an effective approach in place. Auditors will look for evidence that that the approach used by the business can consistently deliver the requirement of the standard.</p>
What do I do if I'm not clear on what a provision means?
<p>The Standards Guidance should be the first point of reference. Where interpretations must be made because the Code and Guidance is not clear, Members and Auditors should take guidance from:</p> <ul style="list-style-type: none"><li>• The RJC's Principles, and other provisions of the Code covering similar subjects;</li><li>• The Self Assessment Workbook which consists of questions to determine conformance with the requirement and examples of typical evidence ;</li><li>• Other recognised ethical, social and human rights standards (SA 8000, OHSAS, ILO Conventions etc.);</li><li>• Widely recognised and accepted responsible business practices.</li></ul>

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The Responsible Jewellery Council is the trading name of the Council for Responsible Jewellery Practices Ltd, The Council for Responsible Jewellery Practices Ltd, First Floor, Dudley House 34-38 Southampton Street, London, United Kingdom WC2E 7HF. The Council for Responsible Jewellery Practices is registered in England and Wales with company number 05449042.

The provisions of the Code must not be re-interpreted, either through guidance provided from external sources, or through determinations made by auditors, in a manner that affects whether there is a non-conformance. Accepted industry practices, and practices that may be accepted under other similar compliance standards covering similar subjects, don't override what would be a non-conformance under the Code of Practices.

For further assistance you can also attend the RJC Training or contact the RJC to discuss any questions. Email: [training@responsiblejewellery.com](mailto:training@responsiblejewellery.com)

To what extent do we need to ensure that facilities that we subcontract to are in compliance with the Code of Practices?

Facilities that aren't owned or controlled by RJC Members are not within the Certification Scope. In other words, these facilities are not included in the Self Assessment or visited during the Verification Assessment.

However the Code of Practices does require Members to consider the risks of their Business Partners, including sub-contractors. Based on this risk assessment, Members are required to use best endeavours to promote responsible business practices among their Business Partners. Auditors will look for evidence of a review of the risks related to business ethics, human rights social and environmental performance of significant business partners, and what the Member has done to promote responsible practices.

What are the requirements of the Kimberley Process?

The Code of Practices audits Members' compliance with the Kimberley Process Certification Scheme, which applies to imports and exports of rough diamonds. The Kimberley Process is a joint government, international diamond industry and civil society initiative to stem the flow of conflict diamonds. Countries have agreed that they will only allow for the import and export of rough diamonds if those rough diamonds come from or are being exported to another Kimberley Process participant. Exported rough diamonds must be accompanied by Kimberley Process Certificates, and the flow of certificates is usually overseen by authorised government agencies. More detail on Kimberley Process requirements are set out in participating countries' legislation.

The Code of Practices requires that Members must:

- Not knowingly buy or sell Conflict Diamonds or assist others to do so
- Apply the controls established in Kimberley Process Certification Scheme for the import and export of rough diamonds. This includes independent audits.
- Have systems in place so that all invoices for diamonds contain the World Diamond Council Warranty Statement
- Inform all Employees that buy or sell Diamonds about government restrictions, the Kimberley Process Certification Scheme and World Diamond Council Warranty Statement

Any Major Non-conformance of the Kimberley Process provisions is a Critical Breach against the RJC Code of Practices.

What is the World Diamond Council System of Warranties Statement and does it need to be word for word on invoices?

The World Diamond Council (WDC) System of Warranties (SoW) requires that all consignments of diamonds, whether rough, polished or set in jewellery (including watches), be accompanied by a written warranty on all invoices through the supply chain. This applies each time the diamonds change hands and extends down to retail jewellers. For manufacturers, all invoices for diamond purchases and for sales to businesses down-stream have to contain the WDC statement (or Kimberley Process Certificates, if applicable to imports of rough diamonds).

For retailers this statement must be on all business to business transactions (but not to end-consumers). Minor variations from the exact wording of the Warranty Statement should not result in a non-conformance providing the changes have no effect on the terms and meaning of the Warranty Statement. The Warranty Statement is:

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*“The diamonds herein invoiced have been purchased from legitimate sources not involved in funding conflict and in compliance with United Nations resolutions. The seller hereby guarantees that these diamonds are conflict free, based on personal knowledge and/or written guarantees provided by the supplier of these diamonds.”*

There are many ways for a Member to ensure invoices contain the warranty statement. Some examples of how it can be done include:

- Have invoices and consignment dockets to be printed with the warranty statement in much the same way these invoices and dockets contain the company logo, address and contact information
- Use of a stamp applied to all invoices and dockets
- Including the warranty statement in the electronic template used to print invoices and dockets.

Members need to determine the most appropriate and adequate method that suits its business. In all cases, a Member whether a supplier or a purchaser of diamonds, whether rough, polished or set in jewellery (including watches), needs to have processes in place to ensure the warranty statement is included in all consignment documentation.

Please refer to Page 12 of the Standards Guidance for further information.

Does a Small Business need to have to have a financial audit?

The Code requires Members to maintain financial accounts where required by Applicable Law and in accordance with national or international accounting standards. The Code also requires that these accounts are independently certified and/or audited by a properly qualified auditor, and that the selection process appoints an auditor that is free of any bias or influence.

For smaller organisations, this provision still applies. Having the accounts reviewed by an accountant that has no potential conflict of interest with the Member (i.e. not an employee, part owner, investor, or relative) would suffice.

Do we need to have a health & safety officer?

No, the RJC Code of Practices does not specifically require a health and safety officer. The Code requires Members to provide safe and healthy working conditions for all employees in accordance with Applicable Law. The aim of health and safety provisions is to prevent accidents and injury to personal wellbeing occurring in the course of work. In some businesses, a dedicated health and safety officer may be employed to oversee relevant programs; in other businesses these responsibilities may be integrated into other functions.

Where can we find information on international named hazardous substances/chemicals?

Please refer to COP3.2 Hazardous Substances on Page 74 of the Standards Guidance. The background, key regulations, suggested management approach and links to further sources of information are provided here.

Further information on managing wastes is provided on page 78 of the Standards Guidance for COP 3.3 Waste and Emissions

How should we dispose of batteries?

Please refer to COP3.2 Hazardous Substances and COP3.3 Waste and Emissions in the Standards Guidance and the Assessment Questions. Most countries have legislation and regulation regarding the proper handling, management, use and disposal of hazardous substances. Many national and state jurisdictions require additional specific conditions for businesses that need to be met especially in storage and handling of hazardous substances, such as lead-acid batteries.

With regards to the disposal of batteries we recommend that you review the applicable law and guidelines issued in your jurisdictions, and make use of available battery recycling and disposal services. You may also find that your battery supplier can provide you with additional guidance.

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Will the RJC provide guidance on calculating working hours? Is a seasonal average ok and what about piece rates?

The RJC will develop further guidance on these issues for the revised Code of Practices, expected to be released in late 2013.

Until then, Members need to be able to provide evidence of how working hours are calculated, including the use of piece rates or other schemes. The Code requires that working hours comply with the Applicable Law (or in the absence of Applicable Law, with ILO Convention 1). Whether seasonal averaging is acceptable would depend on whether it is permitted under the Applicable Law. Regardless however, the Code requires that any overtime be limited to a maximum of 12 hours per week, unless special circumstances apply (such as fly-in fly-out sites).

What do I need to do with regards to Product Integrity?

The Product Integrity provisions concern proper and accurate disclosure of all relevant information about diamond, treated diamond, synthetic (laboratory-grown) diamonds, simulants, and gold products.

Misinformation about articles sold, at any level of the supply chain through to the end consumer, poses a significant risk to the reputation of individual companies and the industry as a whole. Selling diamond and/or gold jewellery articles without disclosing full and accurate information about the product or providing misleading information, even unknowingly, is illegal under most jurisdictions. RJC Members therefore must at all times comply with relevant trading standards legislation and, where they exist, specific national and/or local regulations applicable to Diamond and Gold Jewellery products. Where legislation does not exist, take all reasonable efforts to disclose all relevant information and not make any misrepresentations.

Members and Auditors should look for evidence of records and conduct interviews with relevant employees to confirm:

- Management is knowledgeable of legal requirements
- Any use of simulants and treatments is rigorously tracked and identified
- Gold quality Marks are applied in a manner authorised by Applicable Law
- System is in place to ensure proper disclosure occurs
- Sales invoices and materials provide proper disclosure.

For further information refer to Page 17 in the Standards Guidance Document - COP1.5 Product Integrity.

If black diamonds are not communicated as treated then would this be a major or a minor non conformance?

Black Diamonds are invariably treated but may not always be described as such. They might only be described as "Black Diamonds" as within the industry it is understood they are treated, however consumers are often not aware. Under the Code of Practices all treatments need to be disclosed, so not doing so is a non-conformance and corrective action will be required. In deciding whether it is a major or minor non-conformance, consideration should be given to whether this is a lapse for Black Diamonds only, and whether proper disclosures are being made for other diamonds.

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