

Cross-recognition policy

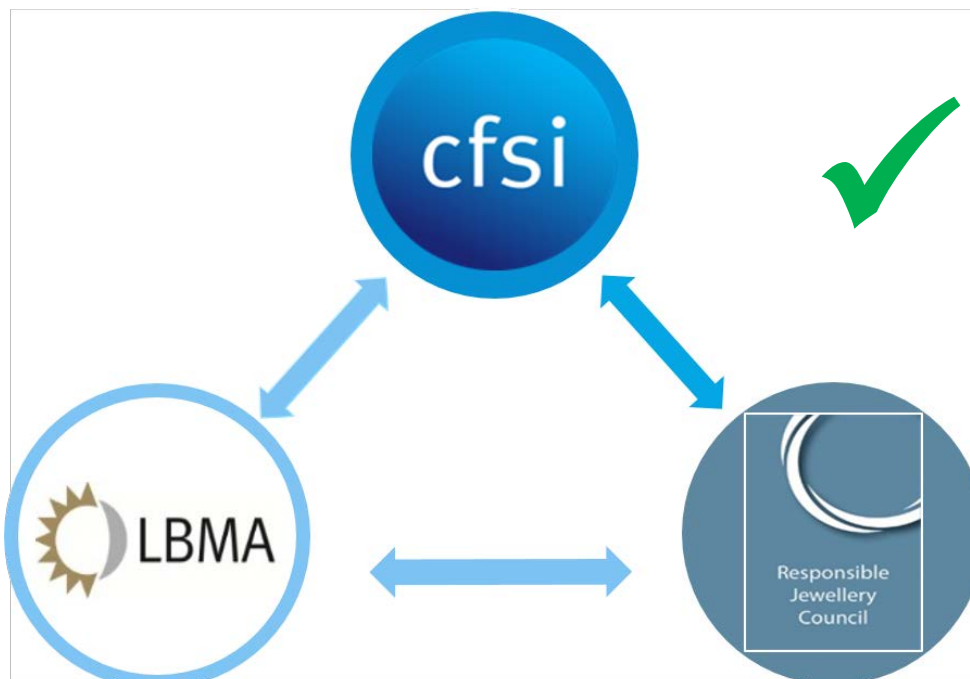
CFSI, LBMA, RJC

In 2012, the Responsible Jewellery Council (RJC), the London Bullion Market Association (LBMA), the Conflict Free Smelter Initiative (CFSI) announced their mutual cross-recognition of their independent, third party audits of gold refiners. The agreement aims to reduce audit duplication for refiners, and to support their efforts in implementing the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Due Diligence Guidance) and complying with responsible sourcing legislation.

All three organisations have developed programs that audit refiners' conflict-sensitive due diligence and responsible sourcing practices in gold supply chains for their respective sectors. Specifically, the following schemes are covered under this cross-recognition policy:

- LBMA Responsible Gold Guidance
- CFSI Conflict Free Smelter Program (CFSP) Gold Protocol
- RJC Chain-of-Custody (CoC) Standard (provision 10 only)

In accordance with this cross-recognition policy, an audit conducted under one scheme can be recognised by the other two schemes as fulfilling some or all of the conflict-sensitive sourcing requirements of their audits, therefore eliminating the need for these requirements to be re-audited. However, this process of recognition by the two schemes must be completed directly with the scheme who conducted the audit of the gold refiner. For example, both the RJC and CFSI can individually recognise the LBMA audit as fulfilling their conflict sensitive sourcing audit requirements, if done directly with the LBMA:



Each scheme reserves the right to request further information or documentation prior to honouring the cross-recognition and awarding their respective certification or compliance determination.

Indirect cross-recognition is not permitted within this policy, meaning that one scheme cannot cross-recognise another scheme's audit via an intermediary scheme. For example, the RJC cannot recognise an LBMA audit via the CFSI's cross-listing of that audit:



Individual schemes may establish other cross-recognitions outside of this agreement, however no de-facto cross-recognitions may occur with the other schemes in the agreement, unless otherwise agreed.