

## STANDARD GUIDANCE

### (COP 2) Policy and Implementation

#### A. Definition and applicability

A **policy** is a statement of principles and intentions.

*Source:*

- *ISO14001 and ISO14004*  
*www.iso14000-iso14001-environmental-management.com/*

The **Policy and Implementation** section of the COP is applicable to all Members.

#### B. Issue background

A policy is a statement by a business of its intentions and principles in relation to its overall performance. A policy:

- Demonstrates commitment from the top;
- Demonstrates corporate responsibility and governance;
- Is consistent with other management policies and practices;
- Is a public document – it can be used by stakeholders to judge the members performance.

The policy required under the Code of Practices supports implementing and improving responsible business practices as a Member of the RJC. Members should document their policy and communicate it to all persons working for, or on behalf of the business. This can be achieved through formal awareness sessions, public newsletters, via the internet or publications in newspapers. Members should review implementation of the policy in their business and identify any gaps where improvements are needed, on at least an annual basis.

#### C. Key regulations

##### ***International Standards***

Many standards initiatives recommend developing a policy as a formal demonstration of the business' commitment to the issue/program, and regularly reviewing that implementation is effective throughout the business enterprise.

#### D. Suggested implementation approach

- ***COP 2.1: Written policy:*** *Members shall adopt a policy/ies that documents the Member's commitment to responsible business practices, is endorsed by senior management, communicated to Employees and made publicly available.*

##### **Points to consider:**

- The policy/ies may refer specifically to the RJC Code of Practices, or may make a more general commitment to responsible business practices, including those covered by the Code of Practices. The policy/ies may be stand-alone, or part of a broader policy statement.
- Ensure the policy is applicable to all parts of the Member's business covered by the Certification Scope and is formally endorsed by senior management.
- Ensure those who work for or on behalf of the company are made aware of the policy. Awareness raising and capacity building will help staff to embed the policy in their own work and procedures.

- The policy/ies must be available to the public, such as by posting it on the company website. If the company does not have a website, consider how to make it available on request or visible to visitors to the premises.
- Consider appending the policy/ies to company contracts, where relevant, to raise awareness of the policy commitment with business partners, service providers and suppliers.

An example policy statement for RJC Members that expresses commitment to achievement of the RJC Code of Practices is included in Appendix X. Members are also free to develop their own policy statement/s on responsible business practices as best suits their business.

- **COP 2.2: Policy implementation review:** *Senior management shall conduct, at least annually, reviews to assess the ongoing suitability and adequacy of the Member's business practices in achieving the policy, and implement improvements to address any gaps.*

**Points to consider:**

- Appoint a member of senior management to monitor and take note of potentially relevant performance issues as they arise.
- Check that the policy is reflected in operational policies and procedures necessary to embed it throughout the business enterprise.
- Hold a discussion among senior management at least annually to identify potential gaps between the policy and actual business practices, and document the results of the discussion.
- Implement action plans to address any gaps and document the results.
- Coordinate with the results of recent RJC audits if applicable.

**Box X: Small business**

Even small businesses can benefit from discussions about ongoing its commitment to responsible business practices, and conformance with the Code of Practices. These can take place as part of the Self Assessment process leading up the certification audit, as well as after Certification. An annual discussion among senior management can be an opportunity to review any non-conformance issues, and check on progress against corrective action plans. Where non-conformances have all been addressed, discuss whether there are any improvement opportunities either within the business or in communication of the policy to key stakeholders. Brief minutes of such meetings can serve as objective evidence of conformance with this provision.

**Check:**

- ✓ Do you have a written policy or policies that commit to responsible business practices?
- ✓ Is it available on the company website or by other means?
- ✓ Do you review the policy and how it is being achieved, at least annually? Use this as an opportunity to identify and make improvements.

**E. Further information**

The following website has further information on the RJC's Code of Practices:

- Responsible Jewellery Council (RJC) - Certification  
[www.responsiblejewellery.com/certification/](http://www.responsiblejewellery.com/certification/)