Introduction
The provenance claim provision (provision 12), introduced into the RJC Code of Practices (COP) in 2013, was designed to reduce risks involving RJC members’ statements about their supply chains and sourcing practices. The provision requires those members making claims about the provenance of the materials they supply, to have them audited as part of their RJC audit, to check if they are truthful and supported by appropriate systems and verifiable evidence.

The provision was also designed to provide flexibility to members to define their own claims. However, with over three years’ implementation experience, we recognise the need to provide further guidance to both members and auditors on the parameters for making and auditing acceptable claims. Using real examples, we hope this guidance will strengthen the claims being made and consequently how they are audited.

The purpose of this document is to provide guidance to auditors on how to audit the provenance claims’ provision 12, as part of the RJC COP audit. This note supplements the chapter on provenance claims in the COP Standards Guidance document. Please note that our guidance on how to make provenance claims is evolving as we gain more experience in certifying claims, and to align with emerging best practice and industry norms. It may be such that the acceptance of claims may change over time.

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1 We’ve updated our provenance claims provision page on our website for members with the same examples:
What is a claim?
A claim in this guidance is understood as the provenance claim audited in the RJC audit, and that appears on the members’ RJC certificate. Members may replicate the claim on invoices and/or marketing materials to communicate to customers. While claims that are audited by you and certified by the RJC should include reference to how they are implemented/verified as explained below, this does not mean that members must use the wording exactly as written on their certificate, every time the claim is made or referred to.

What claims can be made
A provenance claim is a documented claim made by a member to a customer or consumer, about diamonds, gold and/or platinum group metals (rhodium and platinum) 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; 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 conflict-free status, or due diligence towards sources, including sourcing according to the Signet Responsible Sourcing Protocols (SRSPs), the Melee Assurance Protocol from the De Beers Best Practice Principles, or by using the OECD Due Diligence Guidance for Responsible Supply Chains for Minerals from Conflict-Affected and High-Risk Areas.

Claims cannot be made for materials which are not in the scope of the Code of Practices including:
- coloured stones
- silver
- tin
- tungsten
- tantalum.

Requirements for claims - Clear claims that reference the system and/or criteria used
When provenance claims are audited under provision 12 of the COP, these appear on the member’s public COP certificate. To improve transparency, we require that claims include a reference to defined criteria and/or systems. Where possible, the referenced criteria should be publicly available, or made available to interested stakeholders on request. Below are examples designed to show practically how claims should be written.

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2 Coloured stones will be included in RJC scope by the end of 2018.
3 Silver will be included in RJC scope, though when is still to be confirmed. Signet have a SRSP covering silver released in 2017, but silver is not yet included in RJC’s scope – as and when this will be communicated.
4 Signet have a SRSP covering the 3Ts, however RJC does not currently cover these materials in scope, and have no plans to in the future.
Examples of acceptable claims

Here are some examples of acceptable claims, with the system and/or criteria behind the claim underlined and further explanation given as necessary:

1. “We source conflict-free gold (and/or diamonds) in accordance with the Signet Responsible Sourcing Protocol.” – the definition of conflict-free is clear in the SRSP and by referencing this publicly available protocol, external stakeholders can easily understand the parameters of the claim. The scope of the audit will need to cover the requirements of the SRSP, as well as the requirements of COP provision 12 to ensure the member has systems in place to maintain compliance with the SRSP requirements for the length of their RJC certification. For more information on auditing the SRSPs, please see the relevant section below.

2. "Based on written assurance from our suppliers, our diamonds have not originated from the Mbada and Marange regions of Zimbabwe" – the extent of the system should be clear so as not to mislead external stakeholders on the level of assurance offered by the claim. Other examples of accepted provenance claims of this type include: “The diamonds herein invoiced are exclusively of natural origin based on personal knowledge and/or written guarantees provided by the supplier of these diamonds.” – please note this claim is a requirement for diamond suppliers to Signet, to make as part of the D-SRSP; “To seller’s best knowledge, diamonds supplied under this invoice were not obtained from the Democratic Republic of Congo. This Warranty is given under Diamond Source Warranty Protocol, Release Number 1.0”

3. "Our special jewellery line is sourced using at least 40% gold responsibly from only LBMA Good Delivery List refiners.” – When a claim is made, it should be valid over the length of the certification (usually three years). In this case, when only part of the materials a member sells are included in the claim, and the percentage may fluctuate, the use of the words ‘at least’ allows the claims’ to be valid over the length of certification. All refiners on the LBMA Good Delivery List have been audited to demonstrate compliance with its Responsible Gold Guidance – LBMA’s responsible sourcing programme. This claim clearly describes the sourcing approach and proportion of material covered by the claim. The current list of LBMA Good Delivery List refiners is available online.

4. “We source conflict-free gold in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains for Minerals from Conflict-Affected and High-Risk Areas.” – the OECD Guidance is a publicly available document. This claim may be more time-consuming for you to audit than others, as auditing compliance to the OECD Due Diligence Guidance (DDG) is very detailed and thorough. Please note we have an auditor training module (Module 4) on due diligence for gold refiners, which covers the main aspects of the OECD Guidance and must be completed before auditing OECD due diligence claims. Auditors who are accredited to audit members in the gold and/or platinum group...
metals trader, refiner, hedger forum are also required to complete the training. A video recording can be accessed here, while the assessment component can be accessed here.

5. “All our diamonds are natural, all having been checked in a synthetic diamond testing machine to ensure this.” – claims related to the synthetic-free/natural only diamond supplies are becoming more prevalent with increased awareness of undisclosed synthetic/laboratory-grown diamonds across the industry. In this example, the member tests 100% of its stones. If the member only checks higher-risk sources (ie not all stones), this should be identified in the claim, eg, using the Melee Assurance Protocol from the De Beers Best Practice Principles (BPP).

6. “All our diamonds are sourced from Canada, as part of the CanadaMark program which tracks the diamonds from the mine of origin.” Members are permitted to reference other sourcing/traceability schemes in the RJC provenance claim. Auditors may use existing certifications and audit reports of such schemes as evidence of compliance with an external system, however the requirements of COP provision 12 will need to be covered.

7. “We comply with the WDFC Charter on Disclosure of Synthetic, Treated Natural and Natural Diamonds.” The WFDB Charter is publicly available for reference of the criteria behind this claim. Several statements on invoices are made by diamond traders, and we encourage provenance claims to specifically cite the WFDB.

Examples of not accepted claims

These are some examples of claims that are not considered to be acceptable provenance claims:

1. "All our diamonds comply with the Kimberley Process Certification Scheme and World Diamond Council System of Warranties" - these requirements are covered under a separate COP provision (Kimberley Process Certification Scope and World Diamond Council System of Warranties, provision 27) and so are not considered to be a valid provenance claim.

2. "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" - these requirements are covered under a separate provision (Kimberley Process Certification Scope and World Diamond Council System of Warranties, provision 27) and so is not considered to be a valid provenance claim. Please note Signet suppliers may ask for this to be added as a claim as part of the D-SRSP requirements – if so, you can direct them to the RJC website where we identify that this claim is out of scope for the provenance claim provision as it’s covered elsewhere in the COP.
3. “The seller warrants that any product containing gold or diamonds is not sourced from DRC (Democratic Republic of Congo) and is procured from legitimate sources.” – This claim does not communicate how the member does not source from the DRC and would need to be supplemented by this information to be accepted

4. "Our jewellery is made to the best quality on the market" - this relates to product quality which is not a claim about origin, source or practice, therefore is not considered to be a claim about provenance. Another example of such a claim would be “ethically processed” as this relates to the manufacturing process

5. "Our watches are made in France" - Origin claims can only be made about the geographical origin of material, for example country, region, mine of where the material was mined, but not the location of manufacture, therefore is not considered to be a valid claim about provenance

6. “We source all our materials responsibly.” – Terms such as ‘ethically sourced’ and ‘sourced responsibly’ can encompass several various aspects, and are too broad a claim and open to interpretation by different stakeholders. We no longer accept such claims.

Auditing claims
As outlined above, the claims made by members must reflect a management system: this is because claims are designed to be statements of how a member sources their materials on an ongoing basis. You will need to verify the claim you’re auditing through documented criteria and procedures, and their effective implementation. You’ll need to ensure that the member has adequate systems in place for meeting their claim for the length of the certification recommendation, which is a maximum of three years.

COP provision 12 outlines five management system requirements members must meet to make valid provenance claims. Here is an outline of how you would approach auditing a member who makes a provenance claim that their diamonds are synthetic-free:

<table>
<thead>
<tr>
<th>“Provision 12: 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:”</th>
<th>Verify that the member’s management systems are robust and provide reasonable assurance that the system will continue to function as intended for the duration of the RJC COP certificate, which could be valid up to 3 years.</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Documented criteria or requirements that are compatible with the Provenance Claim(s);</td>
<td>How does the member ensure the diamonds are synthetic-free? If this is testing all stones, how do they test the stones, what machines do they use? Is this done in-house or sent to a laboratory? Do they check all stones or do they use a risk approach to decide which ones to test?</td>
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<td>Procedures for record keeping and verification that the criteria or requirements are met</td>
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<td>c.</td>
<td>Controls to maintain the integrity of the materials covered by the Provenance Claim(s)</td>
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<td>d.</td>
<td>Training to ensure that employees who are responsible for responding to product inquiries understand the Provenance Claim(s) and can explain them accurately</td>
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<td>e.</td>
<td>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)</td>
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**Auditing the SRSPs:**

Only audit firms that are accredited by Signet to audit the SRSP’s (as indicated on the RJC website) can audit provenance claims on SRSP compliance.

Before auditing members on their compliance with the SRSPs, auditors must review the following material on the SRSP website (http://www.signetresponsible sourcing.com):

- Read the SRSPs themselves – under ‘Signet documents’
- Read the audit guidance documents and the annual SRSP compliance report – also under ‘Signet documents’
- Listen to the Signet auditor training webinars – under ‘Signet webinars’.

**Please note:** During the audit please use the latest annual SRSP compliance report the member sends to Signet as the first element for review as part of the provenance claim audit.
Please note: The SRSP team requires auditors to advise them immediately of any major non-conformances, especially those which relate to SRSP provenance claim audits. This means contacting the Signet Responsible Sourcing team on info@signetsrsp.com.

Please note: The Signet Responsible Sourcing team may request copies of any SRSP provenance claim audit, which RJC members should allow upon request.

How bolt-on audits work:

RJC encourages members to include provenance claims within the scope of their certification whenever feasible. Recognising that some members will want to add provenance claims to the scope of existing RJC Certificates (‘bolt-on’ claims) after their COP audit has been completed and certificate issued, this will be possible with the following requirements:

a. The provenance claim audit must be carried out using the general RJC audit approach by an RJC accredited auditor using RJC definitions of non-conformances and types of evidence, etc. RJC encourages members to use the same audit firm for RJC Certification audit and ‘bolt-on’ provenance claims audits. However, a different RJC accredited audit firm can be used if a full copy of the previous RJC Certification audit report is provided to the new audit firm conducting the ‘bolt-on’ audit – this is done by the member

b. As part of the provenance claim ‘bolt-on’ audit, members will need to demonstrate compliance with the requirements of provision 12 of the RJC COP, and any other criteria referenced in the provenance claim such as the SRSP

c. The provenance claim audit findings must be presented to RJC regarding the last RJC audit so that provenance claim audit findings are considered within the broader context of the RJC certification, as the outcomes of the bolt-on audit may impact the overall certification (ie the need for a mid-term review). This can take the form of an update of the previous RJC audit report with additions/changes clearly outlines, or as a stand-alone report or addendum, which references the previous report if conducted by another audit firm (see a above). Please clearly note the name of the auditor and the date of the provenance claim bolt-on, as these are included on the certificate (see e below)

d. Provenance claim bolt-on audits can be carried out at any time during the certification period. The due date of the next RJC audit will not alter because of the bolt-on audit, and going forward the provenance claim audit will be incorporated into the scope of the normal cycle of the RJC re-certification audits

e. RJC Certificates will clearly state the date of any additional audits for bolt-on provenance claims, as well as the name of the audit firm and audit team (if different to those who conducted the RJC Certification audit).

Under normal circumstances, independently audited provenance claims such as the SRSP cannot be automatically recognised in later RJC certification audits. Such provenance claims
will need to be re-audited by the RJC certification auditor during the RJC certification audit to ensure the claims meet the requirements of provision 12 of the COP.

What information is required in the audit report

Our Sample COP Audit Report available on our website has information on what is required in the audit report more generally. The audit report needs to include:

- the material covered by the claim
- the type of claim it is - origin, practices, source
- the wording of the claim for the certificate - written on the publicly available certificate when issued
- an explanation about the systems and criteria that sit behind the claim, covering how you audited this.

Note on review of the provision:

Please note that as part of the review of the Code of Practices, further clarifications and changes may be introduced to the provenance claims provision and guidance

Still have questions? Please get in touch if you have any doubts or concerns of how to audit this provision – training@responsiblejewellery.com