



Responsible
Jewellery
Council

BY THE AUTHORITY OF THE COUNCIL

Promotion SpA

IS A CERTIFIED MEMBER OF THE
Responsible Jewellery Council

CERTIFIED MEMBER: 0000 0716

CERTIFICATION PERIOD: 16 FEBRUARY 2016 – 16 FEBRUARY 2019

CHARLES CHAUSSEPIED

Interim Chairman

Responsible Jewellery Council

ANDREW BONE

Executive Director

Responsible Jewellery Council

Certification Scope

Promotion SpA, Vicentina, Italy - Wholesale facility.

RJC CERTIFICATION INFORMATION – CODE OF PRACTICES

Summary



Responsible
Jewellery
Council

Certified Member Promotion SpA

Membership Forum Jewellery Manufacturer and/or Wholesaler

*Certification Number
for this Certification* 0000 0716

Certification Period 16 February 2016 – 16 February 2019

Audit Date 16 December 2015

Audit Type First Certification

*Previous
Certifications* 0

Applicable Standard Code of Practices 2013

Accredited Auditor Bureau Veritas Italia
Lead Auditor: Bruna Gariglio

Certification Scope Promotion SpA, Vicentina, Italy - Wholesale facility.

Applicable Provisions

- 1. General Requirements:** 1-4, except 3.2
- 2. Responsible Supply Chains and Human Rights:** 5-12, except 7, 9.3, 11.3-4 and 12
- 3. Labour Rights and Working Conditions:** 13-20, except 17.3 and 19.3
- 4. Health, Safety and Environment:** 21-25, except 21.10
- 5. Diamonds, Gold and Platinum Group Metals Products:** 26-28, except 28
- 6. Responsible Mining Sector:** Not applicable

Provenance Claims

Not applicable

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.

Mid-Term Review

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

- A. The Member will not require a Mid-Term Review because:**
- No anticipated changes to the Certification Scope during the Certification Period.
- Member has < 25 full time equivalent personnel.
- Low risks of changes to current conformance levels and strong management controls.

- B. The Member will require a desktop Mid-Term Review during the 3 year Certification Period to review progress on corrective action against non-conformances within 12-24 months, but a site visit is not required because:**
- The actions can be verified remotely; or
- No risk to Critical Provisions; or
- There are parallel audit programs for equivalent recognised schemes (e.g. De Beers BPP, SA8000, OHSAS 18001, ISO14001)

- C. The Member will require a Mid-Term Review during the 3 year Certification Period that will include the need for site visits because:**
- Known and anticipated changes to Certification Scope during the Certification Period
 - Certification Audit identified >2 Minor NCs for Critical Provisions; or > 4 Minor NCs in total
 - New systems and controls for Critical Provisions that could not be tested at the Certification Audit
 - Facilities with risk of non-conformances against Critical Provisions
 - Other compelling reason presented by the Lead Auditor.

Confirmation

The Auditors confirm that:

- The information provided by the Member is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- The findings are based on verified Objective Evidence relevant to the time period for the assessment, traceable and unambiguous.
- The scope of the assessment and the method used are sufficient to establish confidence that the findings are indicative of the performance of the Member's defined Certification Scope.
- The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

Auditor Signature

On file

Code of Practices Certification Scope

RJC Members must achieve Certification against the Code of Practices within two years of joining the RJC. The Certification Scope must include those Entities, Facilities and Business Activities under the Member's Control that activity contribute to the Diamond, Gold and/or Platinum Group Metals Jewellery supply chain. This includes the following sectors, where applicable:

- Exploration and Mining
- Diamond Trading, Cutting and Polishing
- Precious Metals Refining, Trading and Hedging
- Jewellery Manufacturing and Wholesaling
- Jewellery Retailing
- Service Industries, including grading, assaying, appraising, secure transport providers and others.

Steps in the Certification Process



Audit methodology

The RJC Code of Practices documentation is comprehensive and includes an auditable standard, detailed Standards Guidance and Assessment Manual, handbook for certification and assessment tools for businesses and auditors. These are all publicly available and can be downloaded at:

<http://www.responsiblejewellery.com/rjc-certification/code-of-practices-certification13/>

Independent third-party audits are conducted by RJC Accredited Auditors to verify that a Member's business performance and its systems and processes conform to the requirements specified in the RJC Standard. The audit process is a management systems audit aligned with ISO19011. Auditors use the triangulation method of management and employee interviews, documentation review and facility observations to verify an Entity's performance against the applicable standards.

Auditor Accreditation

Third party auditors carrying out RJC Certification audits must be accredited by the RJC, a process which involves assessment of competence, independence and internal quality systems of the auditing firm. RJC also provides mandatory training on its standards for accredited auditors. Auditor accreditation information can be found at:

<http://www.responsiblejewellery.com/auditors/>

RJC Complaints Mechanism

The RJC aims to ensure the fair, timely and objective resolution of complaints relating to potential non-conformance with RJC Certification or RJC's own policies and procedures. Where complaints arise, it is a condition of participation in RJC activities for RJC Members and Accredited Auditors to submit to the RJC Complaints Mechanism and to be bound by the decisions of the RJC. However this does not replace or limit access to judicial remedies.

Full documentation supporting the RJC Complaints Mechanism can be downloaded from:

<http://www.responsiblejewellery.com/contact-us/rjc-complaints-mechanism/>

Disclaimer

No guarantee, warranty or representation is made as to the accuracy or completeness of this information. Compliance with RJC's standards and procedures is neither intended to, nor does it create, establish, or recognise any legally enforceable obligations or rights of, or against, the RJC and/or its Members or signatories.