



BY THE AUTHORITY OF THE COUNCIL

*Sur Gems*

IS A CERTIFIED MEMBER OF THE  
*Responsible Jewellery Council*

CERTIFIED MEMBER: 0000 1628

CERTIFICATION PERIOD: 15 MAY 2019 – 15 MAY 2022

Handwritten signature of David Bouffard in black ink.

DAVID BOUFFARD  
*Chairman*  
*Responsible Jewellery Council*

Handwritten signature of Iris van der Veken in black ink.

IRIS VAN DER VEKEN  
*Executive Director*  
*Responsible Jewellery Council*

*Certification Scope*

*Sur Gems, Mumbai, India - Rough and Polished Sales/buying office, Assortment, Accounts and Administration.*

# RJC CERTIFICATION INFORMATION CODE OF PRACTICES

## *Summary*



Responsible  
Jewellery  
Council

<i>Certified member</i>	Sur Gems
<i>Membership forum</i>	Diamond Trader and/or Cutter and Polisher
<i>Certification number</i>	0000 1628
<i>Certification period</i>	15 May 2019 – 15 May 2022
<i>Audit date</i>	26 March 2019
<i>Audit type</i>	First Certification
<i>Previous certifications</i>	0
<i>Applicable standard</i>	Code of Practices 2013
<i>Accredited auditor</i>	ISOQAR India Private Limited Lead Auditor: Manish Doshi
<i>Certification scope</i>	Sur Gems, Mumbai, India - Rough and Polished Sales/buying office, Assortment, Accounts and Administration.

### *Applicable provisions*

- 1. General requirements:** 1-4, except 3.2
- 2. Responsible supply chains and human rights:** 5-12, except 6.2, 7.1, 9.3 & 11.3-4
- 3. Labour rights and working conditions:** 13-20, except 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*

To the best of our knowledge, implemented policies/procedures and/or written assurance from our suppliers, Sur Gems that the diamonds have not been obtained in violation and / or sanctions by the US departments of Treasury's office of foreign assets control (OFAC) and have not been originated from the MBADA and Marange resources of Zimbabwe; Sur Gems, states that the diamonds are exclusively of natural origin and untreated based on personal knowledge and/or written guarantees provided by the supplier of these diamonds. As per the implemented policies/procedures Sur Gems, test all the diamonds in the diamond testing technology for the surety of the natural diamonds and to check that the diamonds are not synthetic; Sur Gems, warrants that these diamonds have been supplied in compliance with the Signet Responsible Sourcing Protocols ('SRSP')

### *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, OHSAS18001, 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*

This certification is issued in accordance with RJC's Assessment Manual. The standard, supporting documentation, and assessment manual, can be downloaded at: [www.responsiblejewellery.com/rjc-certification/code-of-practices-certification13-2/](http://www.responsiblejewellery.com/rjc-certification/code-of-practices-certification13-2/)

This certificate can be authenticated by visiting: [www.responsiblejewellery.com/members/certified-members/](http://www.responsiblejewellery.com/members/certified-members/)

If you have any questions about RJC certifications, please contact: [certification@responsiblejewellery.com](mailto:certification@responsiblejewellery.com)

The RJC aims to ensure the fair, timely and objective resolution of complaints relating to potential non-conformance with RJC certification or policies and procedures. The complaints mechanism and contact details can be accessed downloaded from: [www.responsiblejewellery.com/contact-us/rjc-complaints-mechanism/](http://www.responsiblejewellery.com/contact-us/rjc-complaints-mechanism/)

#### Disclaimer

No guarantee, warranty or representation is made by the RJC as to the accuracy or completeness of the information in this CoC certificate, and no advice or information, whether oral or written, obtained from the RJC or elsewhere, will create any warranty, guarantee or representation in respect of this CoC certificate. 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. To the fullest extent permitted by law, the RJC does not accept or assume responsibility to anyone for the audit process, for the member, for the entity, for the auditor, for CoC certification, or for the decision to grant CoC certification.