



BY THE AUTHORITY OF THE COUNCIL

Neri Romualdo S.p.A.

IS A CERTIFIED MEMBER OF THE
Responsible Jewellery Council

CERTIFIED MEMBER: 0000 I266

CERTIFICATION PERIOD: 31 MARCH 2018 – 31 MARCH 2021

Handwritten signature of David Bouffard in black ink.

DAVID BOUFFARD

Chairman

Responsible Jewellery Council

Handwritten signature of Andrew Bone in black ink.

ANDREW BONE

Executive Director

Responsible Jewellery Council

Certification Scope

Neri Romualdo S.p.A., Arezzo, Italy - Production and commercial facility.

RJC CERTIFICATION INFORMATION CODE OF PRACTICES

Summary



Responsible
Jewellery
Council

<i>Certified member</i>	Neri Romualdo S.p.A.
<i>Membership forum</i>	Jewellery Manufacturer and/or Wholesaler
<i>Certification number</i>	0000 1266
<i>Certification period</i>	31 March 2018 – 31 March 2021
<i>Audit date</i>	8 February 2018
<i>Audit type</i>	Re-Certification
<i>Previous certifications</i>	1
<i>Applicable standard</i>	Code of Practices 2013
<i>Accredited auditor</i>	Bureau Veritas Italia Lead Auditor: Simone Olmo
<i>Certification scope</i>	Neri Romualdo S.p.A., Arezzo, Italy - Production and commercial facility.

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 and 11.2-4
- 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 27 and 28
- 6. Responsible mining sector:** Not applicable

Provenance claims

Neri Romualdo SpA only accepts conflict free gold traceable from refiners on the current LBMA good delivery list or from RJC COC certified refiners or according to OECD Due Diligence Guidance for Responsible Supply Chains for Minerals from Conflict-Affected and High-Risk Areas on KYC and Due diligence.

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/

This certificate can be authenticated by visiting: www.responsiblejewellery.com/members/certified-members/

If you have any questions about RJC certifications, please contact: 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/

Disclaimer

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