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1 Management System and Responsibilities			
1.1 The Entity shall have a Management System/s that addresses all applicable requirements of the Standard, in all Facilities under the Control of the Entity that have Custody of CoC Material.	Verify that the Member has established and is implementing a Management System/s which addresses all applicable requirements of the CoC Standard.	Systems have been developed that meet the Standard in all relevant parts of the business, subject to availability of Eligible/ CoC material.	All relevant parts of the business are operating in conformance with all applicable provisions of the Standard.
	Verify that the Management System/s applies in all Facilities under the Control of the Entity and that have Custody of CoC Material.	<p>Examples of evidence:</p> <ul style="list-style-type: none"> • Policies and procedures including a documented manual that describes the scope and details of the management system • Records such as meeting minutes, evidence of internal audits and management reviews • Personnel trained to understand relevant requirements • Interviews with management and relevant employees to demonstrate understanding and implementation of the system • Observations of practices and controls. 	<p>Policies and procedures have been developed and are being implemented for all relevant requirements.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Policies and procedures including a documented manual that describes the scope and details of the management system • Records such as meeting minutes, evidence of internal audits and management reviews • Personnel trained to understand relevant requirements • Interviews with management and relevant employees to demonstrate understanding and implementation of the system • Observations of practices and controls.
1.2 The Entity shall nominate a management representative as having overall responsibility and authority for the Entity's compliance with	Verify that the Entity has nominated a management representative as having overall responsibility and authority for the Entity's compliance with all applicable requirements of the Standard.	<p>Management representative has been nominated with overall responsibility and authority.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Interviews with management and relevant employees 	<p>Management representative has been nominated and overall responsibility and authority is demonstrated in implementation.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Interviews with management and

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all applicable requirements of the Standard.		<ul style="list-style-type: none"> • Job description containing this responsibility and authority. 	<ul style="list-style-type: none"> • relevant employees • Job description containing this responsibility and authority. •
1.3 The Entity shall establish and implement communications and training measures that make relevant personnel aware of and competent in their responsibilities under the Standard.	Determine whether the Entity has identified personnel with roles and responsibilities relevant to the CoC Standard.	All relevant personnel have been identified have received training and are aware of and competent in their responsibilities under the Standard.	All relevant personnel have been identified, have received training and are aware of and competent in their responsibilities under the Standard.
	Verify that the Entity has effective communication and training measures that make relevant personnel aware of and competent in their responsibilities under the Standard.	<p>Communications programs have been developed and/or implemented.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • List of relevant personnel • Job descriptions for relevant personnel • Communications plan and materials issued • Training materials and records • Interviews with managers, buyers, contracting personnel and other relevant staff to confirm awareness and competence. 	<p>Communications programs have been implemented.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • List of relevant personnel • Job descriptions for relevant personnel • Communications plan and materials issued • Training materials and records • Interviews with managers, buyers, contracting personnel and other relevant staff to confirm awareness and competence.
1.4 The Entity shall maintain records covering all applicable requirements of the Standard and shall retain them for a minimum of five (5) years.	Verify that Entity has a system in place for identifying, retrieving, storing and maintaining records generated by this Standard and that the system ensures records are maintained for a minimum of 5 years.	<p>A record keeping system has been developed.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Procedures specifying data retention periods, and processes for record storage, retrieval and maintenance • Security systems for retaining records • Interviews with relevant personnel. 	<p>Record keeping system is in place and is performing in conformance with the provision.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Procedures specifying data retention periods, and processes for record storage, retrieval and maintenance • Security systems for retaining records • Sample of records including Transfer Documents • Interviews with relevant personnel.

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1.5 The Entity shall have systems in place to enable it to respond to reasonable requests for verification of CoC Transfer Documents issued by the Entity.	Verify that Entity has a system in place that enables it to respond to reasonable requests for verification of CoC Transfer Documents issued by the Entity.	<p>System is in place to respond to verification requests.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> Procedures for completing requests that ensures requests are appropriate and correctly completed Record keeping system Responsible person designated <p>Responses to grievances or complaints relating to the CoC Transfer Documents.</p>	<p>System is in place to respond to verification requests and is operating in conformance with the provision.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> Procedures for completing requests that ensures requests are appropriate and correctly completed Record keeping system Responsible person designated Transfer Documents Demonstrations of process Responses to grievances or complaints relating to the CoC Transfer Documents.
1.6 The Entity seeking CoC Certification shall be an RJC Member, or under the Control of an RJC Member, in good standing, thereby committing to uphold responsible business practices as defined in RJC's Code of Practices.	Determine if the Entity seeking CoC Certification is an RJC Member, or under the Control of an RJC Member, in good standing.	<p>Records are available to show the Entity is an RJC Member, or under the Control of an RJC Member, in good standing.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> Check RJC Member list on website If required, review evidence to demonstrate Control of the Entity by an RJC Member. 	<p>Records are available to show the Entity is an RJC Member, or under the Control of an RJC Member, in good standing.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> Check RJC Member list on website If required, review evidence to demonstrate Control of the Entity by an RJC Member.
2 Internal Material Controls			
2.1 Each point where there is an opportunity for Eligible and/or CoC Material in the Custody of an Entity to become mixed with non-Eligible and/or non-CoC Material shall be identified and controls	Determine that the Entity has identified all points where there is an opportunity for Eligible and/or CoC Material in the Custody of an Entity to become mixed with non-Eligible and/or non-CoC Material.	<p>All points of possible mixing have been identified.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> Procedure for identification and documentation of all points Interviews with management/responsible persons Observation of possible mixing points. 	<p>All points of possible mixing have been identified.</p> <p>Example of evidence:</p> <ul style="list-style-type: none"> Procedure for identification and documentation of all points Evidence that the procedure has been applied during operation Interviews with management/

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put in place to ensure segregation.			<p>responsible persons</p> <ul style="list-style-type: none"> • Observation of possible mixing points.
	Verify that there are controls put in place to ensure segregation of Eligible and/or CoC Material from non-Eligible and/or non-CoC Material.	<p>Controls are in place to ensure segregation.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Documentation of relevant controls • Specifications of segregation systems (electronic or paper based) • Policies and procedures • Job descriptions • Training system • Risk assessment • Interviews • Observation of possible mixing points and controls to mitigate risks. 	<p>Controls to ensure segregation are in place and are operating in conformance with the provision.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Documentation of relevant controls • Specifications of segregation systems (electronic or paper based)Policies and procedures • Job descriptions • Training system • Risk assessment • Interviews • Reconciliations (ref question 2.2) • Observation of possible mixing points and controls to mitigate risks.
2.2 The Entity's internal systems shall be able to reconcile the total weight of Eligible and/or CoC Material for which it has Custody with movements in and out of the inventory over a given time period. If the Entity has Custody of Jewellery Products containing CoC Material, reconciliation may be by item count rather than weight.	Determine that the total weight or count* of Eligible and/or CoC Material for which the entity has Custody can be reconciled with movements in and out of the inventory over a given time period. (*Note that if the Entity has Custody of Jewellery Products containing CoC Material, then Entity may use count rather than weight as the unit of measure.)	<p>System is in place to enable movements of CoC Material in and out of inventory to be reconciled over a given time period.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Specifications of reconciliation systems (electronic or paper based) Training system • Reconciliation records • Demonstration of reconciliation process • Interviews. 	<p>System is in place and operating to enable movements of CoC Material in and out of inventory to be reconciled over a given time period.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Software specifications • Training system • Reconciliation records • Demonstration of reconciliation process • Interviews.
2.3 If the Entity issues a	If the Entity intends to issue a CoC Transfer	System is in place for segregation and	System is in place and performing in

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CoC Transfer Document for CoC Material identified as having a certain Provenance or other characteristic, the Entity's internal systems shall ensure that the requirements for segregation and reconciliation as set out in provisions 2.1 and 2.2 apply to support the segregation of that CoC Material.	Document for CoC Material identified as having a certain Provenance or other characteristic, verify that the Entity has a system in place to ensure that the requirements for segregation and reconciliation as set out in provisions 2.1 and 2.2 apply to that CoC Material.	<p>reconciliation of such CoC Material, if applicable.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • All points where mixing may occur of materials of different Provenance have been identified and documented • Documentation of relevant controls • Policies and procedures • Job descriptions • Interviews with relevant personnel • Training system • Risk assessment • Training system • Results of system tests and reviews. 	<p>conformance with the provision for segregation and reconciliation of such CoC Material, if applicable.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • All points where mixing may occur of materials of different Provenance have been identified and documented • Documentation of relevant controls • Policies and procedures • Job descriptions • Interviews with relevant personnel • Training system • Risk assessment • Training system • Results of system tests and reviews.
2.4 The Entity's internal systems shall verify and document that the contents of each shipment of CoC Material received from, and/or dispatched to other Certified Entities, Outsourcing Contractors or Service Companies are accurately described by the applicable CoC Transfer Document for each such shipment. If an error is discovered after CoC Material has been shipped, the Entity and the other party	Confirm that the Entity's internal systems verify and document that the contents of each shipment of CoC Material received from, and/or dispatched to other Certified Entities, Outsourcing Contractors or Service Companies are accurately described by the applicable CoC Transfer Document for each such shipment.	<p>System is in place to ensure shipments will be verified and documented.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Procedures and controls • Training • Demonstrations of steps that would be taken. 	<p>System to verify and document all shipments is in place and performing in conformance with the provision.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Procedures are being followed and controls are effective • Sampling of CoC Transfer Documents and other records • Physical inspection of CoC material on site and reconciliation with CoC Transfer Documents. • Interviews.
	Determine that the Entity has a system in place to document errors discovered after CoC Material has been shipped and that the system incorporates corrective actions involving other parties affected by the error.	<p>System is in place to document and correct errors.</p> <p>Examples of evidence:</p>	<p>System to document and correct errors is in place and performing in conformance with the provision.</p> <p>Examples of evidence:</p>

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shall document the error and the agreed steps taken to correct it.		<ul style="list-style-type: none"> • Procedures and/or process description. • Software specifications • Demonstration of steps that would be taken. 	<ul style="list-style-type: none"> • Procedures and/or process description. • Software specifications • Observation of controls in place including evidence that steps that have been taken to document and correct errors, if any.
3 Outsourcing Contractors and Service Companies			
<p>3.1 The Entity shall not transfer CoC Material to an Outsourcing Contractor or Service Company unless the following conditions have been met:</p> <p>a. The Entity shall have, and not relinquish, legal ownership of any CoC Material transferred to Outsourcing Contractors or Service Companies.</p> <p>b. The Entity shall assess the risk of potential non-conformance with this Standard resulting from the engagement of each Outsourcing Contractor or Service Company taking Custody of CoC Material owned by the Entity, and determine, based on the risk assessment, that the risk is</p>	<p>Verify that the Entity has systems in place to ensure CoC Material is not transferred to an Outsourcing Contractor or Service Company unless it:</p> <ul style="list-style-type: none"> • retains legal ownership of the material; • has assessed the risk of non-conformance with this Standard and determined that the risk is acceptable; • confirm all Outsourcing Contractor or Service Companies that will have custody of CoC Material are included in RJC CoC Certification Scope and a worksheet has been completed for provision 2; • ensures the Outsourcing Contractor or Service Company has its own systems that conform with Provision 2 (Internal Material Control) of the Standard; and • ensures the Outsourcing Contractor or Service Company does not outsource processing of the CoC material to any other contractor. 	<p>Procedures to identify all relevant Outsourcing Contractors and Service Companies.</p> <p>Confirmation that all Outsourcing Contractors and Service Companies included in the Certification Scope, or a sample of Outsourcing Contractors and Service Companies at the auditor's discretion, have been audited for conformance with provision 2, and have no major non-conformances (Note that audits for Self Assessments may be either 1st, 2nd or 3rd party. For a Certification Audit, Outsourcing Contractors must be audited by the RJC Accredited Auditor).</p> <p>Evidence that legal ownership of CoC Material is not relinquished to any Outsourcing Contractor or Service Company, or if transferred, is no longer CoC Material.</p> <p>Risk assessment completed for each Outsourcing Contractor and Service Company.</p>	<p>Outsourcing Contractors and Service Companies included in the Certification Scope are operating in conformance with provision (Note that audits for Self Assessments may be 1st, 2nd or 3rd party. For a Re-Certification Audit, Outsourcing Contractors must be audited by the RJC Accredited Auditor).</p> <p>Evidence consistent with provision 2 for the Entity applies to each Outsourcing Contractors and Service Companies, subject to sampling at the auditor's discretion.</p> <p>Evidence that ensure legal ownership of CoC Material is not relinquished to any Outsourcing Contractor or Service Company, or if transferred, is no longer CoC Material.</p> <p>Risk assessment completed for each Outsourcing Contractor and Service Company.</p> <p>System to ensure CoC Material will not be</p>

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<p>acceptable.</p> <p>c. Any Outsourcing Contractor that takes Custody of an Entity's CoC Material shall be included in the Entity's Certification Scope and shall have a Management System in place that conforms with provision 2 (Internal Material Control) of this Standard.</p> <p>d. Any Outsourcing Contractor included in an Entity's Certification Scope shall not outsource any processing of CoC Material to any other contractor.</p>		<p>System is in place to ensure CoC Material will not be transferred to any other contractor, or if transferred, is no longer CoC Material.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Certification Scope includes Outsourcing Contractors being used for CoC Material • Contract documents and specifications • Risk assessment • Invoices for work carried out by Outsourcing Contractor • Interviews with relevant personnel • Evidence of audits on Outsourcing Contractors. 	<p>transferred to any other contractor, or if transferred is no longer CoC Material, is in place and operational.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Certification Scope includes Outsourcing Contractors being used for CoC Material • Contract documents and specifications • Risk assessment for activities conducted by Outsourcing Contractor • CoC Transfer Documents and other records • Invoices for work carried out by Outsourcing Contractor • Interviews with relevant personnel • Evidence of audits on Outsourcing Contractors.
<p>3.2 For the return of CoC Material from an Outsourcing Contractor or Service Company:</p> <p>a. The Entity shall verify and record that each transfer received by the Entity for the return of CoC Material is consistent with the CoC Transfer Document issued by the Entity for the CoC Material when</p>	<p>Determine that the Entity has internal checks and controls that verify the CoC Material returned from an Outsourcing Contractor or Service Company is the same Material as identified in the CoC Transfer Document, subject to any changes to the CoC Material expected to occur as a result of the processing or manufacturing activities carried out by the Outsourcing Contractor.</p>	<p>Checks and controls have been established to ensure returned shipments will be verified and confirmed to be within expected changes.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Procedures for checking and accepting shipments of CoC Material • Documentation of tolerances and controls • Training • Interviews. 	<p>Checks and controls to ensure returned shipments are verified and confirmed to be within expected changes are in place and performing in conformance with the provision.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Procedures for checking and accepting shipments of CoC Material are being followed • Documentation of tolerances and controls • Sampling of CoC Transfer Documents

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<p>shipped to the Outsourcing Contractor or Service Company, subject to any changes to the CoC Material expected to occur as a result of the processing or manufacturing activities carried out by the Outsourcing Contractor.</p> <p>b. If there are inconsistencies, the Entity shall not issue any subsequent CoC Transfer Documents for that Material.</p>			<p>and other records</p> <ul style="list-style-type: none"> • Sampling of controls • Training • Interviews.
	<p>Verify that the Entity has processes to ensure any Materials returned from an Outsourcing Contractor or Service Company that have inconsistencies with the CoC Transfer Documents are not included in any subsequent CoC Transfer Documents.</p>	<p>System is in place to ensure that any Materials returned from an Outsourcing Contractor or Service Company that have inconsistencies with the CoC Transfer Documents are not included in any subsequent CoC Transfer Documents.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Procedures for checking and accepting shipments of CoC Material • Procedure describing action to be taken when inconsistencies are identified • Training • Interviews. 	<p>System is in place to ensure that any Materials returned from an Outsourcing Contractor or Service Company that have inconsistencies with the CoC Transfer Documents are not included in any subsequent CoC Transfer Documents.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Procedures for checking and accepting shipments of CoC Material • Procedure describing action to be taken when inconsistencies are identified • Training • Interviews • Sampling of CoC Transfer Documents and other records.
4. Eligible Mined Materials			
<p>4.1 An Entity shall have systems in place to ensure that Mined Material for which the Entity issues an Eligible Material Declaration is sourced only from one or more of the following:</p> <p>a. Mining Facilities that are within its CoC Certification Scope;</p>	<p>Verify the Entity has systems in place to ensure that Mined Material for which the Entity issues an Eligible Material Declaration is sourced only from one or more of the following:</p> <p>a. Mining Facilities that are within its CoC Certification Scope;</p> <p>b. Mining Facilities in which it holds a legal interest and are within the CoC Certification Scope of another CoC Certified Entity;</p> <p>c. Mines or producers certified under a</p>	<p>Systems are in place to ensure that Mined Material for which the Entity intends to issue Eligible Material Declarations is sourced only from one or more of those sources listed in the provision.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • CoC Certification Scope (including of another CoC Certified Entity where relevant) contains mining facilities. • Interviews • Documentation confirming 	<p>Systems are in place and performing in conformance with the provision to ensure that Mined Material for which the Entity intends to issue Eligible Material Declarations is sourced only from one or more of those sources listed in the provision.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • CoC Certification Scope (including of another CoC Certified Entity where relevant) contains mining facilities.

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<p>b. Mining Facilities in which it holds a legal interest and are within the CoC Certification Scope of another CoC Certified Entity;</p> <p>c. Mines or producers certified under a Recognised Responsible Mining Standard, with documented Due Diligence that confirms that the Material comes from such producer’s mining operations;</p> <p>d. ASM producers operating on the Entity’s Mining Facility concessions that have participated in initiatives that enable the professionalisation and formalisation of ASM, and with documented Due Diligence that confirms that the Material comes from such producer’s mining operations on the Entity’s Mining Facility concession and not from Illegitimate Sources;</p> <p>e. Processing residues that contain trace Precious Metals from which Mining Byproduct can be extracted, (for which an Eligible Material Declaration may only be issued by the Refiner).</p>	<p>Recognised Responsible Mining Standard, with documented Due Diligence that confirms that the Material comes from such producer’s mining operations;</p> <p>d. ASM producers operating on the Entity’s Mining Facility concessions that have participated in initiatives that enable the professionalisation and formalisation of ASM, and with documented Due Diligence that confirms that the Material comes from such producer’s mining operations on the Entity’s Mining Facility concession and not from Illegitimate Sources;</p> <p>e. Processing residues that contain trace Precious Metals from which Mining Byproduct can be extracted, (for which an Eligible Material Declaration may only be issued by the Refiner).</p>	<p>source/certification under a Recognised Responsible Mining Standard (*Note: list of Standards maintained on RJC website. Also consult the website of the Standard Owners)</p> <ul style="list-style-type: none"> • Due diligence assessments addressing risk of conflict and Illegitimate Sources (See Implementation of Risk-Based Due Diligence, table 3, RJC CoC Standard Guidance • For on-concession ASM, information on professionalisation and formalisation initiatives • For Refiners and Mining Byproduct: evidence that processing residues are sourced from a processor of other mined metals eg copper, nickel, where precious metals are a trace constituent • Inventory records. 	<ul style="list-style-type: none"> • Interviews • Documentation confirming source/certification under a Recognised Responsible Mining Standard (*Note: list of Standards maintained on RJC website. Also consult the website of the Standard Owners) • Due diligence assessments addressing risk of conflict and Illegitimate Sources (See Implementation of Risk-Based Due Diligence, table 3, RJC CoC Standard Guidance • For on-concession ASM, information on professionalisation and formalisation initiatives • For Refiners and Mining Byproduct: evidence that processing residues are sourced from a processor of other mined metals eg copper, nickel, where precious metals are a trace constituent • Inventory records • Eligible Material Declarations in CoC Transfer Documents.

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Precious Metals from which Mining Byproduct can be extracted, for which an Eligible Material Declaration may only be issued by the Refiner.			
4.2 An Entity issuing an Eligible Material Declaration for Mined Material shall have documented Due Diligence that is able to confirm one of the following: a. The mine or mines from which the Mined Material is produced, and/or the transportation routes for the Mined Material, are not located in Conflict-Affected Areas; or b. The mine or mines from which the Mined Material is produced and/or the transportation routes for the Mined Material are located in Conflict-Affected Areas, and the production, processing and transportation of the Material did not	Determine that an Entity issuing Eligible Material Declarations for Mined Material has conducted documented Due Diligence to confirm that the: <ul style="list-style-type: none"> The mine or mines from which the Mined Material is produced, and/or the transportation routes for the Mined Material, are not located in Conflict Affected Areas; or The mine or mines from which the Mined Material is produced and/or the transportation routes for the Mined Material are located in Conflict Affected Areas, and the production, processing and transportation of the Material did not directly or indirectly finance or benefit Illegal Armed Groups through the provision of payments, logistical assistance or equipment to such Illegal Armed Groups or their affiliates; or The Material is Mining Byproduct with suppliers screened according to the Know Your Customer systems and procedures described in provisions 5.1a,b,c,d and 5.2a,b,c. 	Systems are in place to provide documented Due Diligence Reports, in conformance with the provision, for all relevant sources of Mined Material for which Eligible Material Declarations are expected to be issued. <u>Miners:</u> System is in place to ensure any relevant mine is not located in Conflict Affected Areas or did not finance or benefit Illegal Armed Groups. Examples of evidence: <ul style="list-style-type: none"> Implementation of Risk-Based Due Diligence, table 3, RJC CoC Standard Guidance Responsible person designated Individuals involved in preparing Due Diligence are knowledgeable of local conditions Due diligence carried out by mining companies in accordance with the World Gold Council Conflict-Free Standard Access to third party information about Conflict-Affected Areas Any relevant Illegal Armed Groups have been identified Procedures for screening recipients 	Systems are in place to provide documented Due Diligence Reports, in conformance with the provision, for all relevant sources of Mined Material for which Eligible Material Declarations have been issued, or are expected to be issued. <u>Miners:</u> System is in place to ensure any relevant mine is not located in Conflict Affected Areas or did not finance or benefit Illegal Armed Groups. Examples of evidence: <ul style="list-style-type: none"> Implementation of Risk-Based Due Diligence, table 3, RJC CoC Standard Guidance Responsible person designated Individuals involved in preparing Due Diligence are knowledgeable of local conditions Due diligence carried out by mining companies in accordance with the World Gold Council Conflict-Free Standard Access to third party information about Conflict-Affected Areas Any relevant Illegal Armed

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<p>directly or indirectly finance or benefit Illegal Armed Groups through the provision of payments, logistical assistance or equipment to such Illegal Armed Groups or their affiliates; or</p> <p>c. The Material is Mining Byproduct with suppliers screened according to the Know Your Customer systems and procedures described in provisions 5.1a,b,c,d and 5.2a,b,c.</p>		<p>of payments, logistical assistance or equipment</p> <ul style="list-style-type: none"> • Controls over the use of equipment including aircraft • Controls over the use of cash payments. <p>(Note: consult the RJC CoC Standards Guidance document for further guidance on Due Diligence).</p> <p><u>Refiners</u>: System is in place to ensure that any Eligible Mining Byproduct will be sourced from suppliers screened according to the Know Your Customer systems and procedures described in provisions 5.1a,b,c,d and 5.2a,b,c.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Inventory records • Due diligence assessments • Interviews • Documentation confirming source • Production/process information • Material transfer or transport records. 	<p>Groups have been identified</p> <ul style="list-style-type: none"> • Procedures for screening recipients of payments, logistical assistance or equipment • Controls over the use of equipment including aircraft • Controls over the use of cash payments. <p>(Note: consult the RJC CoC Standards Guidance document for further guidance on Due Diligence).</p> <p><u>Refiners</u>: System is in place and operating to ensure that any Eligible Mining Byproduct is sourced only from suppliers screened according to the Know Your Customer systems and procedures described in provisions 5.1a,b,c,d and 5.2a,b,c.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Inventory records • Due diligence assessments • Interviews • Documentation confirming source • Correspondence records • Material transfer or transport records.
5. Eligible Recycled Materials			
5.1 An Entity shall ensure that any Eligible Recycled Material for which the Entity issues	Verify that an Entity only sources Recyclable Materials for which the Entity issues Eligible Material Declarations according to Know Your Customer principles and procedures.	System is in place to ensure relevant Recyclable Materials are sourced according to Know Your Customer principles and procedures.	System is in place and performing in conformance with the provision to ensure relevant Recyclable Materials are sourced according to Know Your

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<p>an Eligible Material Declaration is produced is produced only from Recyclable Materials sourced according to the following Know Your Customer systems and procedures:</p> <p>a. The Entity shall document a Know Your Customer policy and procedures;</p> <p>b. The Entity shall nominate a Compliance Officer who shall be responsible for implementation of the Entity's Know Your Customer policy and procedures to ensure they are up to date and appropriate;</p> <p>c. The Entity shall carry out a regular internal review of its Know Your Customer policy and procedures;</p> <p>d. The Entity shall monitor relevant transactions for unusual or suspicious activity and report suspicious transactions to the relevant authorities.</p>	<p>The Entity's procedures must include:</p> <ul style="list-style-type: none"> • a Know Your Customer policy and procedures; • a nominated Compliance Officer responsible for implementation of the Entity's Know Your Customer policy and procedures; • the conduct of regular internal review of its Know Your Customer policy and procedures to ensure they are up to date and appropriate; • methods for monitoring relevant transactions for unusual or suspicious activity and reporting of suspicious transactions to the relevant authorities. 	<p>Examples of evidence:</p> <ul style="list-style-type: none"> • Know Your Customer Policy and procedures • Position description and/or appointment letter of a Compliance Officer • Interviews • Documented review/s of policy and procedures • Documentation or observation of monitoring methods • Monitoring records of transactions • Compliance meeting minutes. 	<p>Customer principles and procedures.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Know Your Customer Policy and procedures • Position description and/or appointment letter of a Compliance Officer • Interviews • Documented review/s of policy and procedures • Documentation or observation of monitoring methods • Monitoring records of transactions • Compliance meeting minutes.
5.2 For Recyclable	For Recyclable Precious Metals sourced from	Documented criteria for acceptable sources	Documented criteria for acceptable

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<p>Precious Metals sourced from commercial suppliers:</p> <p>a. The Entity shall provide a documented description of criteria for acceptable sources and types of Precious Metals to:</p> <p>i. Companies seeking approval to become suppliers to the Entity; and</p> <p>ii. CoC Certified customers purchasing CoC Material from the Entity.</p> <p>b. The Entity shall have documented procedures for approval of new commercial suppliers which shall include:</p> <p>i. Establishing the applicant's identity, beneficial ownership and principals;</p> <p>ii. Describing the applicant company's business, its finances, and its source(s) of Precious Metals;</p> <p>iii. Verifying the applicant is engaged in the described business;</p>	<p>commercial suppliers, verify that the Entity provides a documented description of criteria for acceptable sources and types of Eligible Recyclable Precious Metals to any companies seeking approval to become suppliers of Recyclable Precious Metals to the Entity, and any CoC Certified customers purchasing CoC Material from the Entity.</p>	<p>and types of Eligible Recyclable Precious Metals.</p> <p>Procedures for ensuring documented criteria are provided to companies seeking approval.</p>	<p>sources and types of Eligible Recyclable Precious Metals.</p> <p>Procedures are in place and being followed to ensure documented criteria are provided to companies seeking approval.</p>
	<p>Verify that the Entity has documented procedures for approval of new commercial suppliers which include provisions for:</p> <ul style="list-style-type: none"> establishing the applicant's identity, beneficial ownership and principals; information about the applicant company's business, its finances, and its source(s) of Precious Metals; verification that the applicant is engaged in the described business; denying the applicant if information acquired through the approval process provides reasonable evidence to suspect the legitimacy of the supplier and/or its sources. 	<p>Documented procedures are in place and operating.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> Procedures for gathering and verifying information about commercial suppliers. Policies and procedures for denying applicants Records of commercial suppliers' identification details Description of commercial suppliers' business, finances and sources of Precious Metals Records of company checks such as company references and internet research. 	<p>Documented procedures are in place and operating.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> Procedures for gathering and verifying information about commercial suppliers Policies and procedures for denying applicants Records of commercial suppliers' identification details Description of commercial suppliers' business, finances and sources of Precious Metals Records of company checks such as company references and internet research.
	<p>Verify the Entity has documented procedures for monitoring commercial suppliers include:</p> <ul style="list-style-type: none"> maintaining records of existing commercial suppliers' identity, beneficial ownership and principals; maintaining an understanding of the nature of each supplier's business circumstances; and 	<p>Documented procedures are in place and operating to monitor suppliers and update information.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> Records of commercial suppliers' identification details Description of commercial suppliers' business, finances and sources of 	<p>Documented procedures are in place and operating to monitor suppliers and update information.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> Records of commercial suppliers' identification details Description of commercial suppliers' business, finances and sources of

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<p>iv. Denying the applicant if information acquired through the approval process provides reasonable evidence to suspect the legitimacy of the supplier and/or its sources.</p> <p>c. The Entity shall have documented procedures for monitoring commercial suppliers which shall include:</p> <p>i. Maintaining records of existing commercial suppliers' identity, beneficial ownership and principals;</p> <p>ii. Maintaining an understanding of the nature of each supplier's business circumstances;</p> <p>iii. Acting upon information about possible links between the supplier and Illegitimate Sources; and</p> <p>iv. Excluding the supplier from the production of any CoC Material if the</p>	<ul style="list-style-type: none"> • acting upon information about possible links between the supplier and Illegitimate Sources • excluding the supplier from the production of any Eligible Recycled Material if the monitoring procedures identify unusual or suspicious transactions, activities or associations by a supplier, and upon investigation those transactions cannot be cleared of suspicion use. 	<p>Precious Metals</p> <ul style="list-style-type: none"> • Records to confirm descriptions have been updated • Interviews to determine how suppliers are monitored • Incident report form or the equivalent to show the exclusion of suppliers from the production of any Eligible Recycled Material under certain unusual/suspicious circumstances which cannot be cleared via investigation (if has occurred). 	<p>Precious Metals</p> <ul style="list-style-type: none"> • Records to confirm descriptions have been updated • Interviews to determine how suppliers are monitored • Incident report form or the equivalent to show the exclusion of suppliers from the production of any Eligible Recycled Material under certain unusual/suspicious circumstances which cannot be cleared via investigation (if has occurred).

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monitoring procedures identify unusual or suspicious transactions, activities or associations by a supplier, and upon investigation those transactions cannot be cleared of suspicion.			
5.3 For Recyclable Materials for which the Entity issues an Eligible Material Declaration in the form of Jewellery or other products containing Precious Metals supplied directly to the Entity by individuals or estates, the Entity shall apply the following Know Your Customer procedures: a. The Entity shall obtain and record proof of the identity of the seller and record an identification of the Jewellery Product or other product containing Recyclable Materials; b. The Entity shall undertake reasonable steps and inquiry to ensure the Recyclable Materials are not from	Determine that the Entity undertakes reasonable steps and inquiry to ensure the Recyclable Materials supplied directly to the Entity by individuals or estates are not from an Illegitimate Source. Verify that the Entity has systems in place to establish proof of the identity of the seller and record an identification of the Jewellery Product or other product containing Recyclable Materials supplied directly to the Entity by individuals or estates.	System is in place and operational. Examples of evidence: <ul style="list-style-type: none"> Records of identification details of suppliers and of products purchased Procedures for determining individuals and estates are legitimate and products are from legitimate sources Training system and materials Interviews with responsible personnel Records such as images of the item with a date stamp. 	System is in place and operational. Examples of evidence: <ul style="list-style-type: none"> Records of identification details of suppliers and of products purchased Procedures for determining individuals and estates are legitimate and products are from legitimate sources Training system and materials Interviews with responsible personnel Records such as images of the item with a date stamp.

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an Illegitimate Source.			
6. Eligible Grandfathered Materials			
6.1 The Entity issuing an Eligible Material Declaration for Grandfathered Material shall have systems in place to ensure that the information necessary to make the Declaration is recorded, and that the Entity can verify the information on request.	Determine that the Entity issuing an Eligible Material Declaration for Grandfathered Material has systems in place to ensure that the information necessary to make the Declaration is recorded, and that the Entity can verify the information on request.	<p>Record keeping system is in place and operational.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Demonstrations that declarations are accurately and properly stated • Interviews • Procedures for recording dates and Marks by inventory item • Samples of records matched to a serial number or Mark • Procedures for responding to requests. 	<p>Record keeping system is in place and operational.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Demonstrations that declarations are accurately and properly stated • Interviews • Procedures for recording dates and Marks by inventory item • Samples of records matched to a serial number or Mark • Procedures for responding to requests • Procedures and examples of records where the Entity has verified the information on request.
6.2 If the refining date does not appear as a permanent part of the item of Eligible Grandfathered Material, the Entity shall ensure it obtains documented evidence of the year the item was produced or minted based on records matched to a serial number or Refiner's Mark stamped on the item or to some other permanent mark or physical	If the refining date does not appear as a permanent part of an item of Eligible Grandfathered Material, determine that the Entity obtains documented evidence of the year the item was produced or minted based on records matched to a serial number or Refiner's Mark stamped on the item or to some other permanent mark or physical characteristic.	<p>System is in place for obtaining documented evidence when required.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Procedures • Inspection of Marks other permanent mark or physical characteristic – either directly or via records • Interviews • Training. 	<p>System in place and operational for obtaining documented evidence when required.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Test procedures • Inspection of Marks other permanent mark or physical characteristic – either directly or via records • Interviews • Training • Records confirming dates for any Material that does not have a date stamp.

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characteristic.			
7. Eligible Material Declarations			
7.1 The Entity issuing an Eligible Material Declaration in a CoC Transfer Document shall document the Eligible Material as one of the following: a. Mined, in conformance with provision 4 of this Standard; or b. Recycled, in conformance with provision 5 of this Standard; or c. Grandfathered, in conformance with provision 6 of this Standard; or d. Mix of Mined, Recycled and/or Grandfathered, each in conformance with the applicable provisions of this Standard.	Verify that systems to generate CoC Transfer Documents will record the type of Eligible Material being transferred as one of the following:- <ul style="list-style-type: none"> • Mined or Mining Byproduct, in conformance with provision 4 of this Standard; or • Recycled, in conformance with provision 5 of this Standard; or • Grandfathered, in conformance with provision 6 of this Standard; or • Mix of Mined, Recycled and/or Grandfathered, each in conformance with the applicable provisions of this Standard. 	System is in place to accurately record the type of Eligible Material in all CoC Transfer Documents. Examples of evidence: <ul style="list-style-type: none"> • Procedures and controls • Documentation of sources • Interviews • Training • Records of compliance with other relevant initiatives, such as EICC Free Smelter/Refiner Validation the LBMA Responsible Gold Guidance. 	System is in place to accurately record the type of Eligible Material in all CoC Transfer Documents and is performing in conformance with the provision. Examples of evidence: <ul style="list-style-type: none"> • Test procedures and controls to ensure accuracy of the material type that has been declared on transfer document • Documentation of sources • Interviews • Training • Sample of CoC Transfer Documents • Records of compliance with other relevant initiatives, such as EICC Free Smelter/Refiner Validation the LBMA Responsible Gold Guidance.
7.2 For Eligible Mined Material, the Entity shall include in the CoC Transfer Document: a. A Conflict-Free Declaration that identifies if 4.2.a, 4.2.b	Verify that systems to generate CoC Transfer Documents for Eligible Mined Material include: <ul style="list-style-type: none"> • A Conflict-Free Declaration that identifies if 4.2.a, 4.2.b of 4.2.c applies. 	System is in place to ensure the required information will be included in all CoC Transfer Documents. Examples of evidence: <ul style="list-style-type: none"> • Procedures • Documentation of sources 	System is in place to ensure the required information is included in all CoC Transfer Documents and is performing in conformance with the provision. Examples of evidence: <ul style="list-style-type: none"> • Test procedures

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<p>of 4.2.c applies.</p> <p>b. The country or countries where the Mined Material was extracted for 4.2.a or 4.2.b.</p> <p>c. The country or countries where the Mining Byproduct was refined for 4.2c</p> <p>d. If 4.2.b applies, the Entity shall append to the CoC Transfer Document a summary of its Due Diligence for that Material.</p>	<ul style="list-style-type: none"> • The country or countries where the Mined Material was extracted for 4.2.a or 4.2.b. • The country or countries where the Mining Byproduct was refined for 4.2c. • A summary of the due diligence for that that Material appended to the Transfer Document, where 4.2 b applies. 	<ul style="list-style-type: none"> • Interviews • Training • Transfer Document template • Due diligence summary if 4.2b applies • Records of compliance with other relevant initiatives, such as EICC Free Smelter/Refiner Validation the LBMA Responsible Gold Guidance. 	<ul style="list-style-type: none"> • Documentation of sources • Interviews • Training • Due diligence summary if 4.2b applies • Sample of Transfer Documents • Records of compliance with other relevant initiatives, such as EICC Free Smelter/Refiner Validation the LBMA Responsible Gold Guidance.
<p>7.3 When <u>initiating</u> a Chain-of-Custody for Material that will be <u>mixed</u> with existing CoC Material prior to a transfer to another Entity, the Entity shall record an Eligible Material Declaration in an Internal CoC Transfer Document.</p>	<p>Verify that the systems for generating Eligible Material Declarations ensure that an Internal CoC Transfer Document for Eligible Material is recorded where Eligible material is mixed with CoC Material prior to a transfer to another Entity.</p>	<p>System is in place to ensure an Internal CoC Transfer Document for Eligible Material is recorded where Eligible material is mixed with CoC Material prior to a transfer to another Entity.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Procedures and controls • Interviews • Training • Transfer Document template • Records of compliance with other relevant initiatives, such as EICC Free Smelter/Refiner Validation the LBMA Responsible Gold Guidance. 	<p>System is in place and performing in conformance with the provision to ensure an Internal CoC Transfer Document for Eligible Material is recorded where Eligible material is mixed with CoC Material prior to a transfer to another Entity.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Test procedures and controls that ensure an internal transfer document is completed where required • Interviews • Training • Transfer Document template • Records of compliance with other relevant initiatives, such as EICC Free Smelter/Refiner Validation the LBMA Responsible Gold Guidance.

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8. Chain-of-Custody (CoC) Transfer Documents			
8.1 The Entity shall ensure that a CoC Transfer Document accompanies, and wherever possible is physically attached to, each shipment or transfer of CoC Material dispatched to other Certified Entities, Outsourcing Contractors or Service Companies.	Determine that the Entity ensures that a CoC Transfer Document accompanies, and wherever possible is physically attached to, each shipment or transfer of CoC Material dispatched to other Certified Entities, Outsourcing Contractors or Service Companies.	<p>System is in place to ensure a CoC Transfer Document will accompany and where possible will be attached to each shipment of CoC Material.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Procedures and controls • Interviews • Training • Transfer Document template • Demonstrations. 	<p>System is in place to ensure a CoC Transfer Document will accompany and where possible is attached to each shipment of CoC Material, and is operating in conformance with the provision.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Test procedures and controls that ensure a transfer document accompanies each shipment or transfer of material • Interviews • Training • Sample of Transfer Documents • Demonstrations.
8.2 The Entity shall ensure that CoC Transfer Documents include all of the required information outlined in the template in Appendix 1 of this Standard.	Verify that CoC Transfer Documents include all required and accurate information.	<p>System is in place to ensure all required information will be included in CoC Transfer Documents in accordance with Appendix 1 and the Certification Scope.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Procedures and controls • Interviews • Records of second party audits • Training • Transfer Document template • Mock examples. 	<p>System is in place to ensure all required information is included in CoC Transfer Documents in accordance with Appendix 1 and the Certification Scope, and is operating in conformance with the provision.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Test procedures and controls that ensure all CoC documents include all required and accurate information • Interviews • Records of second party audits • Training • Sample of Transfer Documents.
8.3 If the CoC Transfer Document includes supplementary	Verify the entity has systems to ensure that any supplementary information about the Entity, the Eligible Material, or its	System is in place to ensure any supplementary information accompanying the CoC Transfer Document will be accurate	System is in place to ensure any supplementary information accompanying the CoC Transfer

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information about the Entity, the Eligible Material, or its Provenance, the Entity shall ensure the supplementary information can be supported by objective evidence.	Provenance, accompanying the CoC Transfer Document is correct and accurate and supported by objective evidence.	and supported by objective evidence. Examples of evidence: <ul style="list-style-type: none"> • Procedures and controls • Interviews • Training • Transfer Document template • Records of supplementary information. 	Document is accurate and supported by objective evidence, and is operating in conformance with the provision. Examples of evidence: <ul style="list-style-type: none"> • Test procedures and controls • Interviews • Training • Sample of Transfer Documents • Records of supplementary information.
9. Consumer claims and Intellectual Property			
9.1 If the Entity makes claims or representations about CoC Material in a Jewellery Product to consumers, the claims or representations shall be described in written form and made available to consumers at the point of sale, and shall not include information that is inconsistent with the CoC Transfer Document(s) supplying the CoC Material.	If the Entity will make claims or representations about CoC Material in a Jewellery Product to consumers, determine that the claims or representations are described in written form and made available to consumers at the point of sale. Verify that the claims or representations do not include information that is inconsistent with the CoC Transfer Document(s) supplying the CoC Material.	System is in place to ensure any claims to consumers about CoC Material will be available in written form at the point of sale and will not include information that is inconsistent with the CoC Transfer Document(s) supplying the CoC Material. Examples of evidence: <ul style="list-style-type: none"> • Procedures, including approvals of consumer claims • Interviews • Training • Mock examples • Review of customer complaint records. 	System is in place to ensure any claims to consumers about CoC Material is available in written form at the point of sale and does not include information that is inconsistent with the CoC Transfer Document(s) supplying the CoC Material. Examples of evidence: <ul style="list-style-type: none"> • Procedures, including approvals of consumer claims • Interviews • Training of personnel making consumer claims • Samples of written materials, checked against Transfer Documents • Review of customer complaint records.
9.2 The Entity shall have systems in place to ensure all relevant employees, including sales associates, do not make verbal claims or	Verify that systems are in place to ensure personnel dealing with consumers (such as sales associates) only make verbal claims about CoC Material that are consistent with the claims or representations described in written form.	System is in place to ensure any verbal claims made to consumers will not be inconsistent with the claims or representations described in written form. Examples of evidence:	System is in place to ensure any verbal claims made to consumers are not inconsistent with the claims or representations described in written form.

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representations to consumers about CoC Material that are inconsistent with the claims or representations described in written form.		<ul style="list-style-type: none"> • Procedures and controls • Interviews • Training. 	<p>Examples of evidence:</p> <ul style="list-style-type: none"> • Test procedures and controls • Interviews • Training • Observation.
9.3 If the Entity uses the RJC logo, it shall ensure that it abides by the Rules for Use of the Responsible Jewellery Council Logo, Trademarks and Intellectual Property. If the Entity uses the RJC logo and/or CoC Certification stamps in association with Jewellery Products containing CoC Material, it shall ensure that their use clearly applies only to the CoC Material.	Verify that the Entity conforms with the Rules for Use of Responsible Jewellery Council Logo, Trademarks and Intellectual Property (IP).	<p>System is in place to ensure conformance with the RJC Rules.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Policies • Interviews • Records of use of RJC IP. 	<p>System is in place to ensure conformance with the RJC Rules.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Policies • Interviews • Records of use of RJC IP.
	If the Entity uses the RJC logo and/or CoC Certification stamps in association with Jewellery Products containing CoC Material, determine by observation whether its use of the logo clearly applies only to the CoC Material.	<p>System is in place to ensure any use of the RJC logo and/or CoC Certification stamps in association with Jewellery Products containing CoC Material applies only to CoC Material.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Procedures • Interviews. 	<p>System is in place to ensure any use of the RJC logo and/or CoC Certification stamps in association with Jewellery Products containing CoC Material applies only to CoC Material.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Procedures • Interviews • Observation.
10. Conflict-Sensitive Sourcing			
10.1 The Entity shall adopt and communicate to suppliers of Materials and the public a policy for the supply chain of Materials from Conflict Affected Areas.	Verify that the Entity has a policy regarding the supply chain of Materials from Conflict Affected Areas, which is communicated to suppliers of Materials and is publically available.	<p>Entity has a policy regarding the supply chain of Materials from Conflict Affected Areas, and the policy is communicated to suppliers of Materials and is publically available.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Documented policy that conforms with the provision 	<p>Entity has a policy regarding the supply chain of Materials from Conflict Affected Areas, and the policy is communicated to suppliers of Materials and is publically available.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Documented policy that conforms

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		<ul style="list-style-type: none"> List of relevant suppliers Records demonstrating the policy has been communicated to all suppliers List of suppliers Evidence demonstrating the policy is publicly available (or can be made available if Entity has no website). EICC Conflict-Free Smelter/Refiner Validation is considered equivalent. A third-party audit within the previous 12 months verifying compliance with the LBMA Responsible Gold Guidance is considered substantially equivalent. 	<p>with the provision</p> <ul style="list-style-type: none"> List of relevant suppliers Records demonstrating the policy has been communicated to all suppliers List of suppliers Evidence demonstrating the policy is publicly available (or can be made available if Entity has no website). EICC Conflict-Free Smelter/Refiner Validation is considered equivalent. A third-party audit within the previous 12 months verifying compliance with the LBMA Responsible Gold Guidance is considered substantially equivalent. Evidence that policy is periodically reviewed for relevance and suitability.
10.2 If the Entity purchases Materials, it shall assess the risks of non-compliance with its supply chain policy by its suppliers of Materials, and take action to prevent or mitigate the risks.	Verify that the Entity periodically assesses the risks of non-compliance with its supply chain policy by its suppliers of Materials, and has systems in place to take action to prevent or mitigate the risks.	<p>Risks of non-compliance with its supply chain policy by its suppliers of Materials have been assessed and systems are in place to take action to prevent or mitigate the risks.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> Policy and procedures Risk assessments Interviews Examples of actions taken EICC Conflict-Free Smelter/Refiner Validation is considered substantially equivalent. A third-party audit within the previous 12 months verifying compliance with the LBMA Responsible Gold Guidance is considered substantially equivalent. 	<p>Risks of non-compliance with its supply chain policy by its suppliers of Materials have been assessed and systems are in place to take action to prevent or mitigate the risks.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> Policy and procedures Risk assessments Interviews Examples of actions taken EICC Conflict-Free Smelter/Refiner Validation is considered substantially equivalent. A third-party audit within the previous 12 months verifying compliance with the LBMA

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			Responsible Gold Guidance is considered substantially equivalent.
10.3 The Entity shall establish a complaints or grievance mechanism appropriate to the nature, scale and impact of the business, to allow interested parties to voice concerns about circumstances in its supply chain involving Eligible and/or CoC Materials from Conflict Affected Areas.	Determine that the Entity has an effective and appropriate complaints or grievance mechanism that allows interested parties to voice concerns about circumstances in the supply chain involving Eligible and/or CoC Materials from Conflict Affected Areas.	<p>Complaints or grievance mechanism is in place that conforms to the provision.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Policies and procedures • Communications • Training • Records of complaints • Records of remedial actions taken. 	<p>Complaints or grievance mechanism is in place that conforms to the provision.</p> <p>Examples of evidence:</p> <ul style="list-style-type: none"> • Policies and procedures • Communications • Training • Records of complaints • Records of remedial actions taken.

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<p>10.4 If the Entity is a Gold Refiner, it shall apply the following Conflict-Sensitive Due Diligence practices:</p> <p>a. The Refiner shall source all Gold inputs according to the Know Your Customer systems and procedures described in provisions 5.1a,b,c,d and 5.2a,b,c.</p> <p>b. The Refiner shall conduct Due Diligence to confirm that the conditions described in provision 4.2 apply to all of its inputs of Mined Gold. In conducting the Due Diligence, the Refiner may, subject to provision 10.4a, rely on information provided by suppliers of Mined Gold.</p>	<p>Verify the Gold Refiner applies the following Conflict-Sensitive Due Diligence practices:</p> <p>a. all of its Gold inputs are sourced according to the Know Your Customer systems and procedures described in provisions 5.1a,b,c,d and 5.2a,b,c</p> <p>b. Due Diligence is conducted to confirm that the conditions described in provision 4.2 apply to all of its inputs of Mined Gold. In conducting the Due Diligence, the Refiner may, subject to provision 10.4a, rely on information provided by suppliers of Mined Gold.</p>	<p>Evidence of conformance with provisions 5.1a,b,c,d and 5.2a,b,c applies to all Gold inputs.</p> <p>Evidence of conformance with provision 4.2 applies to all inputs of Mined Gold.</p> <p>Examples of evidence of Due Diligence, which may include evidence provided by suppliers of Mined Gold:</p> <ul style="list-style-type: none"> • Implementation of Risk-Based Due Diligence, see table 3, RJC CoC Standard Guidance • Responsible person designated • Access to third party information about Conflict-Affected Areas • Individuals involved in preparing Due Diligence are knowledgeable of local conditions • Any relevant Illegal Armed Groups have been identified • Procedures for screening recipients of payments, logistical assistance or equipment • Controls over the use of equipment including aircraft • Controls over the use of cash payments <p>(Note: consult the RJC CoC Standards Guidance document for further guidance on Due Diligence).</p> <p>EICC Conflict-Free Smelter/Refiner Validation is considered substantially equivalent.</p>	<p>Evidence of conformance with provisions 5.1a,b,c,d and 5.2a,b,c applies to all Gold inputs.</p> <p>Evidence of conformance with provision 4.2 applies to all inputs of Mined Gold.</p> <p>Examples of evidence of Due Diligence, which may include evidence provided by suppliers of Mined Gold:</p> <ul style="list-style-type: none"> • Implementation of Risk-Based Due Diligence, see table 3, RJC CoC Standard Guidance • Responsible person designated • Access to third party information about Conflict-Affected Areas • Individuals involved in preparing Due Diligence are knowledgeable of local conditions • Any relevant Illegal Armed Groups have been identified • Procedures for screening recipients of payments, logistical assistance or equipment • Controls over the use of equipment including aircraft • Controls over the use of cash payments <p>(Note: consult the RJC CoC Standards Guidance document for further guidance on Due Diligence).</p> <p>EICC Conflict-Free Smelter/Refiner Validation is considered substantially</p>

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		A third-party audit within the previous 12 months verifying compliance with the LBMA Responsible Gold Guidance is considered substantially equivalent.	equivalent. A third-party audit within the previous 12 months verifying compliance with the LBMA Responsible Gold Guidance is considered substantially equivalent.