

RJC 2019 Code of Practices Frequently Asked Questions 24 April 2019

From July 2017 to January 2019 the Responsible Jewellery Council (RJC) undertook a major review of the Code of Practices (COP), the standard against which all RJC members must demonstrate independently verified conformance to achieve certification.

The **2019 COP Standard** and **2019 COP Guidance** have now been published. This document provides more information on what this means for members and other FAQs.

In December 2009, the RJC formally launched its COP for responsible business practices in the

jewellery supply chain. A second version of the COP was published in November 2013. The 2019 COP is the third and most recent version.

Q: How much has the COP changed?

A: The core structure and requirements of the COP have not fundamentally changed. The 6 sections remain the same: (1) general requirements, (2) responsible supply chains, (3) labour, (4) health safety and environment, (5) products, and (6) responsible mining. Changes have been made on most of the provisions to strengthen and update the requirement and/or to clarify the text. More and updated information



has been added to the COP Guidance and, on certain topics, detailed guidance has been developed for assessing conformance.

Q: What are the most significant changes?

A: The biggest changes are:

- Expanding the material scope of the COP to include coloured gemstones (rubies, emeralds, sapphires) and silver
- Aligning COP due diligence requirements with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the 'OECD Guidance')
- New requirements for detection of undisclosed synthetic diamonds
- New guidance for assessing conformance with requirements on working hours which allows for seasonal variations in overtime in alignment with International Labour Organisation (ILO) standards
- More guidance on human rights in alignment with the UN Guiding Principles on Business and Human Rights
- Stronger requirements and guidance on environmental issues like climate change, water use, and waste, and for mining, on tailings, biodiversity and cumulative and indirect impacts.
- Better inclusion of gender and vulnerable groups throughout the COP.

Q: When can I start using the 2019 COP?

A: Straight away. The 2019 COP and 2019 COP Guidance are now final and supersede previous versions. The Self-Assessment Workbook, Assessment Manual and supporting auditor and member training will be published 1 July 2019.

Q: Quand est-ce que le COP sera disponible en français? Quando sarà disponibile in italiano? A: Le 1 juillet / 1 luglio 2019



Q: When will I get audited against the 2019 COP?

A: Member certification deadlines will not change, and all existing COP certificates remain valid till their expiration dates.

A 1-year transition period from 23 April 2019 to 22 April 2020 applies for audits as follows:

- For existing members, the RJC will accept new certifications and re-certifications against either the 2013 or the 2019 COP during the transition year. Note that auditor accreditation for the 2019 COP will only be available after 1 July 2019 and is required for these audits.
- Members certified against the 2013 COP will not have silver and/or coloured gemstones included in their certification scope; members certified against the 2019 COP will.
- New members that join the RJC from 1 July 2019 must use the 2019 COP.
- Members with only silver and/or coloured gemstones in scope must use the 2019 COP.
- Any audits against the 2013 COP must be completed before 22 April 2020.
- From 22 April 2020 onwards the RJC will only accept new certifications and recertifications against the 2019 COP.

Q: I just completed my 2013 audit and I deal in silver and/ or coloured gemstones, can I bolt-on the silver/coloured gemstones requirements to my 2013 certification?

A: No. The requirements for silver and coloured gemstones are integral to the 2019 COP and a bolton audit would require re-checking the entire 2019 COP scope.

Q: What's changed on due diligence?

A: Due diligence requirements which were part of the previous COP (under COP 6.2) have been reworked into a separate requirement (now COP 7) which aligns with the OECD Guidance. Detailed guidance has been developed in two parts: a section on diamonds and coloured gemstones (stones) and a section on gold, silver and platinum group metals (metals). This includes templates and checklists for companies to use.

Q: Do I have to implement the due diligence requirements straight away? How will this be assessed during the audit?

A: Yes, RJC members need to establish and start implementing their due diligence systems straight away. We will be developing and piloting a Due Diligence Toolkit to support members in the diamond and/or coloured gemstones value chain to implement this requirement.

During the pilot period, COP conformance shall be phased-in. Members scheduled for COP certification or recertification:

- Between 23 April 2019 and 22 April 2020: shall have the option to use the 2013 or 2019 version of the COP for auditing (as per the defined transition period). If choosing to certify against the 2019 COP, members shall be assessed for conformance with the following elements of Step 1 of the OECD Guidance:
 - having a supply chain policy; and
 - assigning responsibility to someone who will lead the development of relevant management systems.
- Between 23 April 2020 and 22 April 2021: shall be assessed for conformance with the following elements of Step 1, Step 2, and Step 5 of the OECD Guidance:
 - having a supply chain policy and responsible person (as above);
 - o preliminary supply chain mapping and scoping efforts; and
 - publicly reporting progress on due diligence efforts covering all elements above.
- Between 23 April 2021 and 22 April 2022: the findings of the pilot projects will be used to evaluate the COP, guidance, audit approach and related RJC tools as necessary. At the conclusion of the review and release of updated RJC documents, members undergoing



certification and recertification audits shall be assessed for conformance with Steps 1–5 of the OECD Guidance.

Q: Why doesn't the new COP cover all coloured gemstones?

A: Given the complexity and diversity of the coloured gemstone supply chains, the RJC is following a staged approach. We will work with 'early adopter' members dealing in rubies, emeralds and sapphires in order to learn from implementation and refine the COP. This is very similar to what we did when initially establishing the COP with the diamond and gold supply chains. It is our intention to expand the scope of materials beyond rubies, emeralds and sapphires, and we will review the scope of coloured gemstones by 2021.

Q: Will my membership fee calculation change?

A: No. Membership fee rates remain the same and fees will still be calculated as a percentage (0.004% or 0.006%) of a member's Annual Relevant Sales (ARS), depending on their membership forum. Some members may experience an increase in their membership fees related to the expansion of the materials in a company's ARS calculation. Membership fees do not include the cost of the independent, third party audit that is required to achieve certification.

Q: When will the COP next be reviewed?

A: RJC is committed to developing credible and effective standards and continually improving its systems. In accordance with the Iseal Alliance Standards Setting Code, we commit to a full review of the COP at least every five years. We may review sections, or all of the COP, earlier as needed. Sign up to the <u>RJC communications mailing list</u> to make sure you get alerted.

Q: How did these changes get decided?

A: The COP is reviewed in alignment with the ISEAL code through gap analysis, research and stakeholder consultation. The review involved speaking with more than 300 people during 12 workshops around the world. All decisions on the COP revisions are taken by the multi-stakeholder Standards Committee through a consensus seeking approach. The entire process is highly transparent and all the proposed changes, comments received and responses are documented on the <u>RJC website</u>.

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