



# (COP 2) POLICY AND IMPLEMENTATION

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## A *Definition and applicability*

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A **policy** is a statement of principles and intentions.

Source:

- ISO14001 and ISO14004  
[www.iso14000-iso14001-environmental-management.com/](http://www.iso14000-iso14001-environmental-management.com/)

The **Policy and Implementation** section of the COP is applicable to all Members.

## B *Issue background*

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A policy is a very common way for a business to:

- Demonstrate commitment from the top;
- Demonstrate corporate responsibility and governance of key risks and issues;
- Set the platform for more detailed company procedures and practices;
- Communicate publicly to stakeholders on principles and intentions.

The policy required under the Code of Practices supports implementing and improving responsible business practices as a Member of the RJC. Members should document their policy and communicate it to all persons working for, or on behalf of the business. This can be achieved through formal awareness sessions, public newsletters, via the internet or publications in newspapers.

Changes frequently occur within businesses, and in the broader context in which they operate. It is therefore important to review implementation of the policy and identify any gaps where improvements are needed, on at least an annual basis.

## C *Key regulations*

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### INTERNATIONAL STANDARDS

Many standards initiatives require developing a policy as a formal demonstration of the business' commitment to the issue/ program, along with regularly reviewing that implementation is effective throughout the business.

## D *Suggested implementation approach*

The Suggested implementation approach provides general guidance for implementing the mandatory requirements of the Code of Practices. The guidance is not normative and should be seen as a starting point for information and support.

### **COP 2.1: WRITTEN POLICY:**

**Members shall adopt a policy/ies that documents the Member's commitment to responsible business practices, is endorsed by senior management, communicated to Employees and made publicly available.**

#### **Points to consider:**

- The policy/ies may refer specifically to the RJC Code of Practices, or may make a more general commitment to responsible business practices, including those covered by the Code of Practices. The policy/ies may be stand-alone, or part of a broader policy statement.
- Check that the policy is applicable to all parts of the Member's business covered by the Certification Scope and is formally endorsed by senior management.
- Check those who work for or on behalf of the company are made aware of the policy. Awareness raising and capacity building will help staff to embed the policy in their own work and procedures.
- The policy/ies must be available to the public, such as by posting it on the company website. If the company does not have a website, consider how to make it available on request or visible to visitors to the premises.
- Consider appending the policy/ies to company contracts, where relevant, to raise awareness of the policy commitment with business partners, service providers and suppliers.

An example policy statement for RJC Members that expresses commitment to achievement of the RJC Code of Practices is included at the end of this chapter. Members are also free to develop their own policy statement/s on responsible business practices as best suits their business.

### **COP 2.2: POLICY IMPLEMENTATION REVIEW:**

**Senior management shall conduct, at least annually, reviews to assess the ongoing suitability and adequacy of the Member's business practices in achieving the policy, and implement improvements to address any gaps.**

#### **Points to consider:**

- Appoint a member of senior management to monitor and take note of potentially relevant performance issues as they arise.
- Check that the policy is reflected in operational policies and procedures necessary to embed it throughout the business enterprise.
- Hold a discussion among senior management at least annually to identify potential gaps between the policy and actual business practices, and document the results of the discussion.
- Implement action plans to address any gaps and document the results.
- Coordinate with the results of recent RJC audits if applicable.

## D *Suggested implementation approach (cont)*

### SMALL BUSINESS

Even small businesses can benefit from discussions about its ongoing commitment to responsible business practices and RJC conformance. These can take place as part of the Self Assessment process leading up to the certification audit, as well as after Certification. An annual discussion among senior management can be an opportunity to review any non-conformance issues, and check on progress against corrective action plans. Where non-conformances have all been addressed, discuss whether there are any improvement opportunities either within the business or in communication of the policy to key stakeholders. Brief minutes of such meetings can serve as objective evidence of conformance with this provision.

### CHECK

- Do you have a written policy or policies that commit to responsible business practices?
- Is it available on the company website or by other means?
- Do you review the policy and how it is being achieved, at least annually? Use this as an opportunity to identify and make improvements.

### RJC POLICY – EXAMPLE TEMPLATE

The following draft could be modified or adapted to suit the Member's business/es.

#### **Responsible Jewellery Council Policy**

[INSERT MEMBER NAME] is a [BRIEF DESCRIPTION OF THE COMPANY].

We have [X] sites located [Y] and employ [Z] personnel.

[MEMBER NAME] is a Member of the Responsible Jewellery Council (RJC).

The RJC is a standards-setting organisation that has been established to advance responsible ethical, human rights, social and environmental practices throughout the diamond, gold and platinum group metals jewellery supply chain.

The RJC has developed a benchmark standard for the jewellery supply chain and credible mechanisms for verifying responsible business practices through third party auditing.

As an RJC Member / Certified Member [select as appropriate], we commit to operating our business in accordance with the RJC Code of Practices. We commit to integrating ethical, human rights, social and environmental considerations into our day-to-day operations, business planning activities and decision making processes.

[Add any additional business-specific commitments as appropriate]

Signed/endorsed:

Date of effect:

## E *Further information*

The following website has further information on the RJC's Code of Practices:

- Responsible Jewellery Council (RJC) - Certification  
[www.responsiblejewellery.com/certification/](http://www.responsiblejewellery.com/certification/)