

Cross-recognition policy

RMI, LBMA, RJC

In 2012, the Responsible Jewellery Council (RJC), the London Bullion Market Association (LBMA), the Responsible Minerals Initiative (RMI, formerly CFSI) announced their mutual cross-recognition of their independent, third party audits of gold refiners. The agreement aims to reduce audit duplication for refiners, and to support their efforts in implementing the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Due Diligence Guidance) and complying with responsible sourcing legislation.

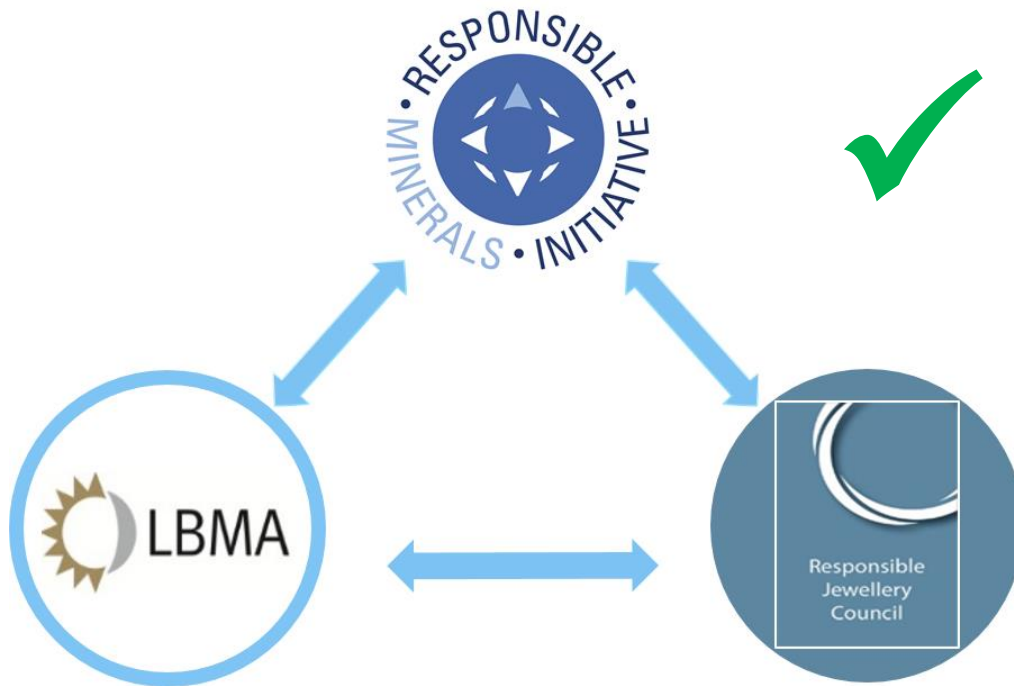
In 2017 RMI, LBMA and RJC completed alignment assessment against the OECD Due Diligence Guidance and updated their audit standards, in part to address recommendations from the assessment. Following this process, the programs also updated the cross-recognition policy to reflect changes in the standards.

All three programs have developed programs that audit refiner's due diligence and responsible sourcing practices in gold supply chains for their respective sectors. Specifically, the following schemes are covered under this cross-recognition policy:

- RMI Responsible Minerals Assurance Process (RMAP) Gold Standard
 - o Country of Origin data from LBMA and RJC audited refiners is needed for cross-recognition under the new standard (effective June 1, 2018)
 - o Cross-recognition agreement excludes LBMA Associate refiners, since LBMA does not validate those audit results
- LBMA Responsible Gold Guidance (RGG)
 - o LBMA requires a "top-off" audit to be performed for refiners that have undergone RMI or RJC audits to evaluate whether all of the of the Responsible Gold Guidance (RGG) requirements are met or if any RGG elements should be further assessed
 - o The "top-off" audits must be performed by an auditor on LBMA's approved third party service providers list
- RJC Chain-of-Custody (CoC) Standard
 - o Cross-recognition for CoC standard provision 1 only

Each scheme reserves the right to request further information or documentation prior to honouring the cross-recognition and awarding their respective certification or compliance determination.

In accordance with this cross-recognition policy, an audit conducted under one scheme can be recognised by the other two schemes as fulfilling **some or all** of the requirements of their audits, therefore eliminating the need for these requirements to be re-audited. However, this process of recognition by the two schemes must be completed directly with the scheme who conducted the audit of the gold refiner. For example, both the RJC and RMI can individually recognise the LBMA audit as fulfilling their some or all of their standard requirements, if done directly with the LBMA:



Indirect cross-recognition is not permitted within this policy, meaning that one scheme cannot cross-recognise another scheme's audit via an intermediary scheme. For example, the RJC cannot recognise an LBMA audit via the RMI's cross-listing of that audit:



Individual schemes may establish other cross-recognitions outside of this agreement, however no de-facto cross-recognitions may occur with the other schemes in the agreement, unless otherwise agreed.