

Appendix 3 – Criteria for Determining Provisions to be Assessed during COP/LGMS Surveillance Audits

CRITERIA FOR DETERMINING PROVISIONS TO BE ASSESSED DURING COP/ LGMS SURVEILLANCE AUDITS

For COP/LGMS, the certification body shall conduct a surveillance audit (see Section 22, Surveillance Audit Format And Scope in the RJC Certification Process Requirements document) of certified members to assess continuing conformity with critical provisions or where there are known risks to conformity due to the entities'/facilities' activities or geographic presence, as per the criteria below, regardless of whether there are, and in addition to, any minor nonconformities with implemented corrective actions to assess. Note that the activities relate to the relevant entities/facilities and not to the declared member forum.

TABLE A3.1. CRITERIA FOR DETERMINING PROVISIONS TO BE ASSESSED DURING COP/LGMS SURVEILLANCE AUDITS

ENTITIES/ FACILITIES ACTIVITIES	REFERENCE			PROVISION	INSTRUCTION FOR AUDITORS
	COP 2019	COP 2024	LGMS 2025		
All	1	1	1	Legal Compliance	Review of any changes since last audit.
	3	3	3	Reporting	Check that reporting has been completed and made publicly available.
	6	6	6	Human Rights	Review of any changes to policies in response to international activity; information received; and activity against procedures and actions taken if issues have been uncovered. Review any grievances/ allegations in the public domain and how these are being addressed.
	7	7	7	Due Diligence for Responsible Sourcing, Including from Conflict-Affected and High-Risk Areas	Review of any changes to policies in response to international activity; changes to supply chain and due diligence conducted; and updates to any risk assessments.
	12	12	10	Know Your Counterparty (KYC): Money Laundering and Financing of Terrorism	Review of any changes to policies, questionnaires, implementation, etc. Confirm process is being actively used for any new counterparties.
	14	14	12	Claims	Review any changes to any relevant existing claims or any new claims.
If diamond trading, also include:	29	30	28	Kimberley Process Certification Scheme and World Diamond Council System of Warranties	Sample documents and reconciliation reports.

Appendix 3 - Criteria for Determining Provisions to be Assessed during COP/LGMS Surveillance Audits

ENTITIES/ FACILITIES ACTIVITIES	REFERENCE			PROVISION	INSTRUCTION FOR AUDITORS
	COP 2019	COP 2024	LGMS 2025		
If mining, also include:	33	34	N/A	Indigenous Peoples and Free, Prior and Informed Consent (FPIC)	Review any change to policies and discuss any outreach and communications since the last audit.
	38	39	N/A	Biodiversity	Check for any grievances or issues raised since the last audit.
	39	40	N/A	Tailings and Waste Rock	Check for any grievances or issues raised since the last audit.
If mining/LGM producer/ refining/cutting and polishing/ jewellery and watch manufacturing, also include:	16	16	14	Working Hours	Review of two months' simple sample of working hours records since certification audit and simple sample of individuals' records.
	17	17	15	Remuneration	Review of two months' simple sample of working hours records since certification audit and simple sample of individuals' records.
	18	18	16	Harassment, Discipline, Grievance Procedures and Non-Retaliation	Review any reported grievances, reviews and outcomes since the last audit and review a sample of disciplinary cases for the same period.
	19	19	17	Child Labour	Check sample of new recruits since the certification audit; sample records of young workers to ensure working hours and health checks conform to any legal requirements.
	20	20	18	Forced Labour	Check sample of contracts of new recruits since the certification audit; sample records of leavers since the last audit to verify ability to leave employment and conformity with legal requirements.

Appendix 3 - Criteria for Determining Provisions to be Assessed during COP/LGMS Surveillance Audits

ENTITIES/ FACILITIES ACTIVITIES	REFERENCE			PROVISION	INSTRUCTION FOR AUDITORS
	COP 2019	COP 2024	LGMS 2025		
If mining/LGM producer/ refining/cutting and polishing/ jewellery and watch manufacturing/ laboratories, also include:	23	24	22	Health and Safety	Review any accidents and near misses; review investigations of accidents and implementation of improvements identified; conduct a general site tour.
	25	26	24	Hazardous Substances	Review risk assessment and onboarding of new substances; compliance requirements for banned substances, as applicable; and storage and handling.
	26	27	25	Wastes and Emissions	Check for any local authority inspections and actions since the last audit and any grievances or issues raised. Check for any scope 1 and 2 reports and how they were verified.

