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**NOTE: design this cover as per your own company guidelines**

**INSERT YOUR COMPANY NAME HERE**

**REPORTING REQUIREMENTS**

**FOR COP 7**

**ABOUT THIS TEMPLATE**

This reporting template is designed for RJC members\* to fulfil the annual reporting requirements for COP 7 Due Diligence within the RJC Code of Practices 2019.

\*This template is designed to fulfil all reporting requirements for non-mining RJC members, all members are welcome to use the templates provided but there are additional reporting requirements for mining members.

**HOW TO USE THIS TEMPLATE**

1. Complete contact information at the top of each section.
2. Using the reporting Requirement and Tip tables as a guide, complete the sections as applicable to your business, do this for each reporting template that you wish to use.
3. Once you have completed all required sections you need to prepare the report for publishing by removing the Requirement and Tip tables.
4. Once you have deleted the guidance ables you will be left with your final report.

##### COP 7: DUE DILIGENCE

Contact Information

COMPANY NAME: **[Insert company name]**

DATE: **[Insert Date]**

REPORTING PERIOD: **[Insert Reporting Period]**

CONTACT: **[Insert contact’s email address]**

STEP 1: ESTABLISH STRONG COMPANY MANAGEMENT SYSTEMS

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| **DELETE THIS TABLE ONCE COMPLETED** | |
| REQUIREMENT | TIP |
| 1.A Adopt, and clearly communicate to suppliers and the public, a company policy for the supply chain of minerals originating from conflict-affected and high-risk areas. | Include details about your policies within your own operations and on all supply chains relating enhanced due diligence on minerals originating from conflict-affected and high-risk areas and how they are communicated internally, to suppliers and other stakeholders. |

[Insert company name] have the following polic(y/ies) [insert details] in place with regard to our supply chain on the following minerals [delete as appropriate to your company gold, silver, platinum group metals, diamonds, emeralds rubies and sapphies] originating from conflict-affected and high-risk areas. This polic(y/ies) is communicated [detail how and when] and can be accessed via [detail where it is publicly available].

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| REQUIREMENT | TIP |
| 1.B Structure internal management systems to support supply chain due diligence. | Describe how you have structured internal management and other segments of your business to support due diligence and who is the individual responsible for due diligence. |

To support supply chain due diligence, we have implemented the following internal measures [give details]. The senior manager[s] responsible for overseeing supply chain due diligence [is/are] [position title and name].

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| REQUIREMENT | TIP |
| 1.C Establish a system of controls and transparency over the minerals supply chain. | Describe your approach for identifying suppliers and sources of your materials/products and how this has strengthened your due-diligence efforts, and for record keeping. |

[Insert company name] have established a system of controls and transparency over our supply chain; which include, our approach for identifying suppliers [give details] and identifying sources of our [materials/products] [give details]. These methods have strengthened our due diligence efforts by [give details].

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| REQUIREMENT | TIP |
| 1.D Strengthen company engagement with suppliers. | Describe the steps you have taken to strengthen engagement with suppliers to e.g., establishing long-term relationships, communicating your expectations, and helping suppliers to build capacity for due diligence. |

As a company we communicate our expectations regarding supply chain due diligence via [give details]. In addition to this we also take the following steps to strengthen our engagement with suppliers; [give details]; the outcome of doing so has been [give details].

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| REQUIREMENT | TIP |
| 1.E Establish a company-level, or industry wide, grievance mechanism as an early warning risk-awareness system. | Provide details of your grievance mechanism, including where it can be accessed and who is responsible for it. |

Our grievance mechanism for internal stakeholders can be accessed by [give details of where they can find this], our external grievance mechanism is available via [give details]. The employee[s] responsible for these grievance mechanism(s) is/are[give name and position title].

STEP 2: IDENTIFY AND ASSESS RISK IN THE SUPPLY CHAIN

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| REQUIREMENT | TIP |
| Identify and assess risks in the supply chain and assess risks of adverse impacts. | Describe how you have assessed the risks of your upstream suppliers (discovered during your due-diligence activities) and disclose any actual or potential risks or impacts you have identified. Describe how you have assessed your suppliers due-diligence practices. You do not need to disclose the names of specific suppliers here but rather the overall risks. For example, “we have identified a risk of child labour related to 3 suppliers sourcing from country X”. Optionally you can also include the number of incidents of the risk identified, as well as suppliers and the country “We identified x incidents of risk x relating to x (no of) suppliers from x country” |

We assess our supplier’s due diligence practices by [insert details of how you assess this].  
During our assessment of our supplier’s due diligence practices, we identified the below potential and actual risks within our supply chain. [Use the below sentence structure to list any risks or potential risks identified]  
- We have identified a [potential risk/risk] of [insert risk] related to [detail where in your supply chain (e.g. supplier) including country].

STEP 3: DESIGN AND IMPLEMENT A STRATEGY  
TO RESPOND TO IDENTIFIED RISKS (if applicable)

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| REQUIREMENT | TIP |
| Report findings of the supply chain risk assessment to the designated senior management of the company. | Say who in your company receives the findings of risk assessments (provide position titles e.g., Managing Director). |

The senior manager who receives the findings our risk assessment is [insert name and position title].

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| REQUIREMENT | TIP |
| Devise and adopt a risk management plan. | Describe the steps you have taken to design and implement a strategy to respond to the risks and impacts identified. |

To respond to the risks identified within our supply chain, we took the following steps to design and implement a risk management plan [detail how this was done]. Our risk management plan consists of the following [give details on what this includes for each specific risk]. E.g timescales, actions taken, objectives.

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| REQUIREMENT | TIP |
| Implement the risk management plan and monitor performance of risk mitigation efforts. | Disclose your efforts to monitor and track the effectiveness of your mitigation measures, including the results of your follow-up activities after six months to evaluate significant and measurable improvement. |

[Use this sentence to detail how you implemented your risk management plan for each risk identified]  
To implement our risk management plan we have taken the following risk mitigation steps [give details of the steps taken for implementation for each risk identified]; and we continue to monitor the plan and track the effectiveness of these risk mitigation measures by [give details]. In addition to this, we evaluated improvement of this risk after six months through [details how you followed up] the result of which was [detail the findings of your follow up].

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| REQUIREMENT | TIP |
| Internal training. | Include the detail of any applicable training provided to staff or contractors. |

[Insert company name] provided the training regarding our due diligence activities to our [employees and/or contractors] on [give dates]; this training included information on [give a brief summary of the training provided]. We have also provided training regarding our due diligence activities to all of our [employees and/or contractors] on [give dates]; this training included information on [give a brief summary of the training provided, this can include the audience, frequency of training and topics covered].

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| REQUIREMENT | TIP |
| Communications. | Describe how you engage with stakeholders on your due-diligence activities. |

[Insert company name] communicate to our stakeholders regarding our due diligence activities.This communication is in the form of [communication methods, if multiple please list].]

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| REQUIREMENT | TIP |
| Detail a summary of any grievances received and how you handled them (remediation actions). | Any grievances raised since your previous report and how you have addressed them, you do not need to include identifying details but an overview on the grievance raised and how you remediated it. |

Since our last report [no grievances have been raised] [the following grievances have been raised] regarding human rights risks or our supply chain due diligence:  
- [Grievance(s) raised]  
- [List the remediation action to address the grievance]

CARRY OUT A THIRD PARTY AUDIT (OPTIONAL INFORMATION)

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| **DELETE THIS TABLE ONCE COMPLETED** | |
| REQUIREMENT | TIP |
| RJC COP audit | Consider including a summary of your RJC COP audit, including the date of the audit, the audit activities and methodology and the findings. |

[Insert company name] has joined the RJC in [year] and has since achieved [number] [1/3 year, as applicable] certifications.

In support of our continuous improvement journey, our latest third-party RJC audit took place within our organisation against the RJC COP 2019 on [insert date].