



RJC Code of Practices (COP) Standard Review Consultation Webinar

17th May 2018

consultation@responsiblejewellery.com

Agenda

Objective: Consultation on proposed changes to the Code of Practices (COP).

1. About RJC
2. Overview of the COP Standard
3. COP review process
4. Overview of main proposed changes
 - Due Diligence
 - Know Your Counterparty (KYC)
 - Sourcing recycled industrial precious metals
 - Working hours
 - Product disclosure: undisclosed synthetic diamonds
 - Mining
 - Scope expansion: Coloured stones, silver
 - Other
5. Next steps

See *proposed revisions to the COP standard, including key guidance sections [here](#), on the RJC website*

RJC vision and mission

Our **vision** is a responsible world-wide supply chain that promotes trust in the global fine jewellery and watch industry.

Our **mission** is to be the recognised standards and certification organisation for supply chain integrity and sustainability in the global fine jewellery and watch industry.



RJC stats – March 2018



1093 MEMBERS



739 COP CERTIFIED MEMBERS

59 CoC CERTIFIED MEMBERS



8,900 FACILITIES COVERED BY
COP CERTIFICATION

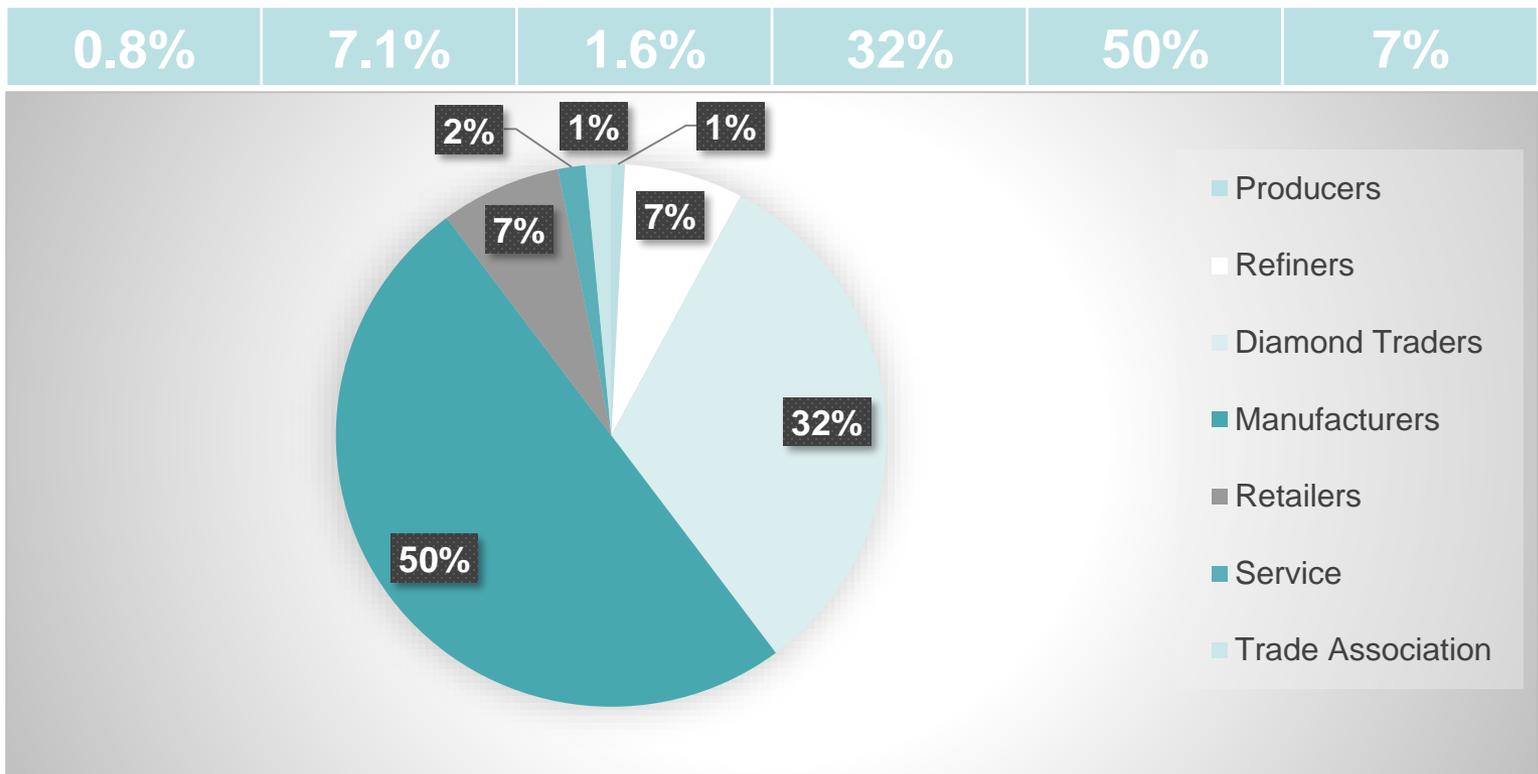


457,462 EMPLOYEES COVERED
BY COP CERTIFICATION



75
COUNTRIES

RJC membership



RJC Standards

Code of Practices (COP)

- Launched in 2009, reviewed in 2013
- Assurance of a company's business practices
- Compulsory for RJC members
- Diamonds, gold, platinum group metals (PGM)

Chain-of-Custody (CoC)

- Launched for precious metals in 2012, updated in 2017
- Assurance that metals are from responsible sources and certified at every stage of the supply chain
- Voluntary for RJC members dealing in gold and PGM



GENERAL
REQUIREMENTS



RESPONSIBLE
SUPPLY CHAINS
& HUMAN RIGHTS



LABOUR RIGHTS
& WORKING CONDITIONS



HEALTH, SAFETY
& ENVIRONMENT



DIAMONDS, GOLD
& PLATINUM GROUP
METAL PRODUCTS



RESPONSIBLE
MINING SECTOR

Aims of the COP

- Provide a common standard for RJC members
- Set out the mandatory expectations for designing and implementing relevant policies, procedures and practices
- Establish provisions that can be independently audited
- Drive better business practices for positive impacts
- Mitigate present and future environmental and social supply chain risks

Overview of the Code of Practices (COP)

RJC CODE OF PRACTICES



GENERAL
REQUIREMENTS



RESPONSIBLE
SUPPLY CHAINS
& HUMAN RIGHTS



LABOUR RIGHTS
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HEALTH, SAFETY
& ENVIRONMENT

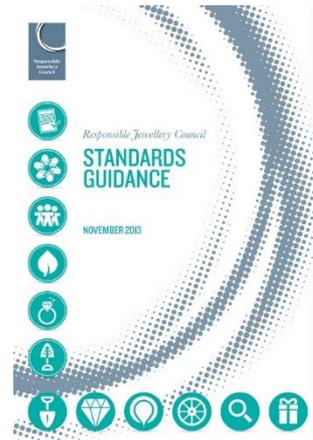


DIAMONDS, GOLD
& PLATINUM GROUP
METAL PRODUCTS



RESPONSIBLE
MINING SECTOR

COP tools and supporting documents



Standards Guidance
Self-assessment workbook
Training material

Process for reviewing standards



Round 1

1. Planning phase – what topics do we need to review?

- Log of issues, questions from helpdesk, non-conformances
- Publish a ‘Public Summary’ with plan for the review

Round 2

2. Review and consultation phase – what changes will we make?

- Commissioned and in-house research on key topics
- Consultation with members and stakeholders (workshops, webinars, email campaigns)
- Draft of proposed changes
- Optional additional revised changes and consultation

Round 3
(optional)

Approvals

3. Finalization phase

- Standards Committee, ExCo and Board
- Legal review



RJC Code of Practices (COP) Review |
Round 2 public consultation - proposed changes to the COP
Comment period: 16 April – 1 July 2018

Share your comments on proposed changes to the COP using [this template](#) to: consultation@responsiblejewellery.com

Post: Responsible Jewellery Council, 9 Whitehall, London SW1A 2DD
Telephone: +44 (0)20 7321 0992

1. Purpose

The Responsible Jewellery Council (RJC) is reviewing its [Code of Practices \(COP\)](#), the standard against which all RJC members must be certified. This document describes the proposed changes to the standard and is used to invite all interested parties to provide input.

2. Background

In December 2009, the RJC formally launched its Code of Practices for responsible business practices in the diamond, gold and/or platinum group metals jewellery supply chain. All RJC members must be certified against the COP, following an independent, third party audit to verify conformance. A second version of the COP was published in November 2013; and the current review will inform a third version, due to be published at the start of 2019.

RJC is committed to developing credible and effective standards and continually improving its systems. We have been a full member of the [ISEAL Alliance](#) since 2012, and we follow ISEAL Codes of Good Practice in our standard setting, assurance and monitoring and evaluation.

We are reviewing the standard through a process of gap analysis and stakeholder consultation which is overseen by our multi-stakeholder [Standards Committee](#). The process includes at least two public consultation periods: Round 1 on the Public Summary document (completed in August 2017), and Round 2 on draft proposed changes to the standard (this document). For more information on the review process, see the [Public Summary](#) document.

Since Round 1, we have updated our timeline for the review of the COP, see [update to the timeline](#) in the annexe of this document.

The proposed changes in this report have been informed by consultation with COP certified companies; a review of logged issues from over 4 years of certification, comments received through the consultation process (as summarised in the [Comment Report](#) on Round 1), and a review of parallel initiatives and engagement with the Standards Committee.

COP review – timeline (updated April 2018)

Round 1: Review of scope - COMPLETE

- Undertake gap analysis and stakeholder mapping
- Round 1 public comment on scope of review (min 60 days, 10 July – 8 Sept 2017): [Public Summary](#)
- Publish summary of comments received: [Comment report](#)
- Facilitate dialogue on input received with Standards Committee
- Research and draft proposed changes to COP

Round 2: Proposed changes to standard

- Round 2 public comment on proposed changes to COP and key guidance (min 60 days, 16 April - 1 July 2018): *this document*
- Workshops and consultation from 20 March - 16 July 2018
- Publish summary of comments received
- Facilitate dialogue on input received with Standards Committee (24 July). Decision on whether to do Round 3.
- Update COP review timeline (if needed)
- Research and revise proposed changes

Round 3 (optional): Revise changes to standard

- Round 3 public comment on revised changes for outstanding issues (min 30 days, 21 Aug - 5 Oct)
- Publish summary of comments received
- Facilitate dialogue on input received with Standards Committee

Approvals and finalisation

- Standards Committee recommends approval of the revised COP (7 Nov 2018)
- RJC Executive Committee accepts recommendation or sends back to Committee for further review (Nov 2018)
- Board of Directors accepts recommendation or sends back to Committee for further review (Dec 2018)
- Editorial and legal review
- Publish revised COP (31 Jan 2019)
- Certification starts 1 May 2019

All proposed changes to COP

COP provisions with substantial changes	COP provisions with minor changes
<ul style="list-style-type: none"> 6. Human rights X. (previously 6.2) Due diligence for responsible sourcing 7. Sourcing from Artisanal and Small-Scale Mining (ASM) Y. (new) Sourcing recycled industrial precious metals 10. Know Your Counterparty - money laundering and finance of terrorism 14. Working hours 15. Remuneration 16. Harassment, discipline, grievance procedures and non-retaliation 24. Wastes and emissions 25. Use of natural resources 26. Product disclosure – this includes a new requirement on undisclosed synthetic diamonds 28. Grading, analysis and appraisal 30. Community Engagement 	<ul style="list-style-type: none"> 11. Security 13. General employment terms 18. Forced labour 19. Freedom of association and collective bargaining 20. Non-discrimination 22. Environmental management 23. Hazardous substances 31. Indigenous peoples and free prior informed consent 33. Artisanal and small-scale mining and large-scale mining 35. Emergency response 36. Biodiversity 38. Cyanide 40. Mine rehabilitation and closure

COP provisions with substantial changes

6. Human rights

X. (previously 6.2) Due diligence for responsible sourcing

7. Sourcing from Artisanal and Small-Scale Mining (ASM)

Y. (new) Sourcing recycled industrial precious metals

10. Know Your Counterparty for money laundering and finance of terrorism

14. Working hours

15. Remuneration

16. Harassment, discipline, grievance procedures and non-retaliation

24. Wastes and emissions

25. Use of natural resources

26. Product disclosure – **this includes a new requirement on undisclosed synthetic diamonds**

28. Grading, analysis and appraisal

29-40 Mining section

4. Overview of main proposed changes

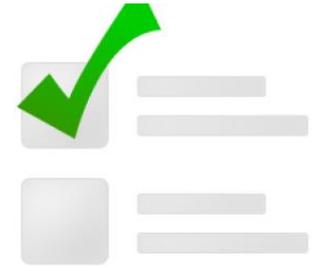
1. Due Diligence
2. Know Your Counterparty (KYC)
3. Sourcing recycled industrial precious metals
4. Working hours
5. Product disclosure: undisclosed synthetic diamonds
6. Mining

7. Scope expansion: Coloured stones, silver
8. Other

Overview of main proposed changes

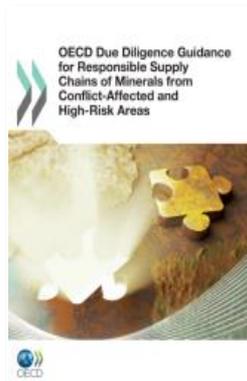
COP X (previously 6.2): Due Diligence for Responsible Sourcing

Due diligence - topic overview



Objectives

- Emphasise the due diligence process as a responsible business practice
- Aligning the mandatory COP with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
- Move the related requirements from the Chain-of-Custody (CoC) to the COP
- Develop significant additions to the guidance on how to carry out due diligence



Due diligence for diamonds - Webinar

**RJC COP Review
Webinar for Diamond
Supply Chain**

JUN
7
Thu
2018

12:00 pm

Responsible
Jewellery
Council

2018 RJC COP REVIEW
Diamond Supply Chain Webinar

📍 ONLINE

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[Register now](#)

Changes to COP provisions

X. Due Diligence for Responsible Sourcing (previously COP 6.2)

X.1 Members shall adopt and communicate to their suppliers a supply chain policy with respect to sourcing from conflict-affected and high-risk areas. The policy shall be consistent with Annex II of the OECD Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the “OECD Guidance”) or other due diligence frameworks as identified by RJC.

X.2 Members shall exercise due diligence over their supply chains in accordance with the OECD Guidance, or other due diligence frameworks identified by RJC, in ways appropriate to their size and circumstances

- a. Members in the gold value chain shall implement the recommendations of the OECD Guidance Supplement on Gold as applicable to their operations.
- b. Members in the diamond supply chain shall exercise due diligence in ways consistent with the Kimberley Process Certification Scheme and World Diamond Council System of Warranties

Changes to COP provisions – refiner requirements

X.3 Refiner members shall:

- a. Maintain internal material control systems that allow for the reconciliation of movement of inventory in and out over a given time.
- b. Gold refiners shall additionally collect and, with due regard to business confidentiality, share information on the mine of origin of mined gold received with the RJC on an annual basis.

Principles of the OECD Guidance

- ✓ On-going, proactive and reactive due diligence approach
- ✓ 'Conflict-affected areas', 'high-risk areas' and 'other red flags' trigger heightened due diligence but not necessarily disengagement from trade
- ✓ Due diligence is risk based i.e. intensity of due diligence is proportional to risk
- ✓ Progressive improvements over time and good faith and reasonable efforts promoting constructive engagement with suppliers
- ✓ Global scope i.e. not just DRC and adjoining countries
- ✓ Applicable to all minerals i.e. not only 3Ts and gold

What does it mean to align with OECD guidance?

- 5-step risk based due diligence process applies to all companies throughout the supply chain that produce or potentially use minerals from conflict-affected and high-risk areas (CAHRAs)

Step 1 Establish strong company management systems

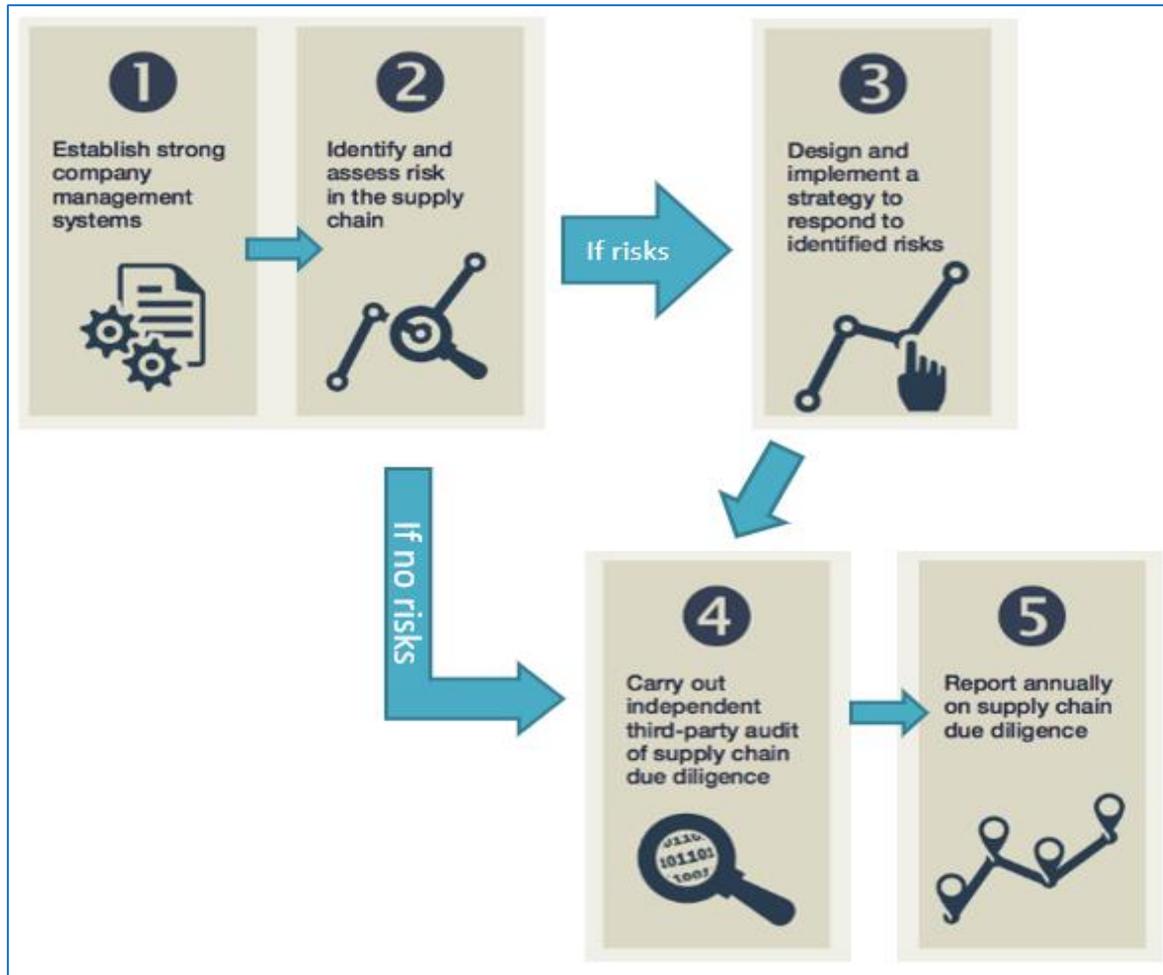
- A. Have a policy
- B. Internal management to support due diligence
- C. System of controls / transparency on the supply chain. Identify upstream actors
- D. Engage with suppliers
- E. Have a grievance mechanism

Step 2 Identify and assess risk in the supply chain

Step 3 Risk mitigation

Step 4 Independent 3rd party audit (by RJC auditors)

Step 5 Report on supply chain due diligence



What issues should the supply chain policy cover?

- No** support to non-state armed groups – **this risk is covered by Kimberley Process Certification Scheme**
- No** to “serious human rights abuses” such as forced labour, slavery, the worst forms of child labour, widespread sexual violence, war crimes
- Prevent & mitigate** support to public security forces, bribery, tax evasion, money-laundering and fraud in supply chains
- Strengthen** internal controls, due diligence systems, engagement with suppliers

Annex II of the OECD Guidance provides a model supply chain policy

Practical questions

Is full traceability required?

- No, the requirement to “establish a system of transparency over the mineral supply chain” means seeking aggregated information on the origin of material from your suppliers.
- Only upstream segments of the supply chain should seek traceability of materials to a mine/company source

How to identify risks?

- Use information from your suppliers as well as other data sources (eg, credible international reports (ILO) and information from civil society networks operating on-the-ground). Sources of information will be outlined in the COP Guidance.
- Identify ‘red flags’ and assess the risk that adverse impacts are occurring. Companies need to be responsible for their own identification of risks.

Practical questions

What about 'choke points' for supply chains other than gold?

- For precious metals supply chains, the refiner will be the 'choke point'
- For diamonds and coloured stones, choke points will not be specified by RJC. Companies will identify their own choke points. These can be upstream choke points (eg, rough exporters, rough traders) or midstream choke points (eg, cutter & polishers, polished trader). If no practical choke points are identified, due diligence will focus on the biggest, immediate suppliers.

Is the OECD Guidance compatible with the diamond Kimberley Process Certification Scheme (KPCS) and World Diamond Council (WDC) System of Warranties (SoW)?

- Yes. The KPCS and WDC SoW are a fundamental part of due diligence in the diamond supply chain. The KPCS provides evidence that risks of rebel financing are addressed. The KPCS and SoW do not however address all the risks that need to be covered through due diligence (e.g. human rights, violence, violations of law, etc).
- The COP requires that RJC members apply the KPCS and adopt the SoW in all cases.

Overview of main proposed changes

COP 10: Know Your Counterparty (KYC)

Know Your Counterparty – topic overview



Objectives

- Review financial thresholds for maintaining records of cash transactions to align with international frameworks
- Consider key references such as:
 - 4th EU Anti-Money Laundering Directive
 - Financial Action Task Force (FATF) recommendations (2018)
 - AML-CFT applicable law in key RJC member countries
- Move the related requirements from the Chain-of-Custody (CoC) to the COP

10. Know Your Counterparty - money laundering and finance of terrorism

10.1 Members shall document and apply a Know Your Counterparty (KYC) policy and procedures for business partners. Business partners include suppliers and customers of gold, silver, PGM, diamonds, coloured gemstones or jewellery products containing these materials. The policy and procedures shall include::

- a. Establishing the identity of the counterparty by checking government issued identification. Where triggered by a risk assessment or applicable law, establish the beneficial ownership and principals of the counterparty.;
- b. Verifying that the counterparty and, if applicable, their beneficial owners, are not named on relevant government lists for individuals or organisations implicated in money laundering, fraud or involvement with prohibited organisations and/or those financing conflict.
- c. Maintaining an understanding of the nature and legitimacy of their business;
- d. Monitoring transactions for unusual or suspicious activity and reporting suspicions of money laundering or finance of terrorism to the relevant authority as applicable.
- e. Maintaining adequate records for a minimum of five years or for as long as required by national legislation, whichever is longer

10.2 Members shall nominate an individual to be responsible for implementing the KYC policy and procedures.

10.3 Members shall carry out a regular review of the KYC policy and procedures to ensure they are up to date and appropriate.

Changes to COP provisions

10.4 Members shall maintain records of all cash or cash-like transactions which occur above the relevant defined financial threshold under applicable law and, where required, report these to the relevant designated authority. Where no applicable law exists, members shall monitor and maintain records of all cash transactions equal to or above **10,000 euro / us dollars**, where the transaction is carried out in a single operation or in several operations that appear to be linked.

Overview of main proposed changes

COP Y (new): Sourcing recycled industrial precious metals

Sourcing recycled industrial precious metals

Y. Sourcing recycled industrial precious metals

Y.1. Members that source gold, PGM and/or silver from informal recyclers that are not under the control of the member shall:

- a. Regularly assess risks of forced labour, child labour, unsafe working conditions, exposure to toxic chemicals and metals, and other significant environmental impacts, and
- b. Use best endeavours to positively influence practices and reduce or avoid the risks and provide for or cooperate in remediation of adverse human rights and environmental impacts.



Overview of main proposed changes

COP 14: Working hours



Working hours

Objectives

- Develop guidance on a defined degree of tolerance for working hour non-compliances

Why is it important?

- Inconsistencies in working hours are common in the industry
 - Seasonal industry
 - Short production timelines
 - Skilled labour dependency
 - Worker expectation of overtime



ELEVATE study: Understanding how RJC's current working hour provisions (COP 14) compared to other industry standards and local law

Working hours – normal work week, overtime

- 14.1 Members shall comply with applicable law on working hours. The normal work week, not including overtime, shall be defined by local law but shall not exceed 48 hours.~~shall not exceed 48 hours unless higher limits have been set by applicable law for the sector in which the member operates~~
- 14.2 If overtime work is required for business needs, members shall ensure that:
- a. Overtime work is requested by the member under a voluntary overtime system. Required overtime is permitted only where it is within the limits allowed under applicable law or collective bargaining agreements. The imposition of overtime where women or men employees are unable to leave the work premises or are in any way forced to accept it (through abuse, threats of dismissal, or other) is not allowed. Refusal to work overtime shall not be punished, retaliated against, or penalized in any way.
 - b. The sum of the normal work week and overtime hours shall not exceed 60 hours in a week unless defined otherwise by applicable law or permitted under a collective bargaining agreement or unless there are exceptional circumstances (such as production peaks, accidents or emergencies). In all cases, appropriate safeguards shall be taken to protect the workers' health and safety.

Working hours – overtime tolerance

Total working hours per week	1% to 5% of work weeks	5% to 32% of work weeks	More than 32% of work weeks
More than local law limit and 84 hours/week +	Critical non-conformance (NC)		
More than local law limit and Between 72 and 84 hours/week	Major NC	Critical NC	Critical NC
More than local law limit and between 60 and 72 hours/week	Minor NC	Major NC	Critical NC
More than local law limit and less than or equal 60 hours/week	Minor NC	Minor NC	Major NC
< 60 hours/week and local law	Conformance		

Working hours – rest days, leave, workday breaks

14.3 Members shall provide all employees with at least one rest day in seven consecutive working days in accordance with ILO Convention 14. Work time exceeding this limit is permitted only under ~~a collective bargaining agreement or applicable law that allows for work time averaging including adequate rest periods~~ the following circumstances:

- a. A collective bargaining agreement or applicable law that allows for work time averaging including adequate rest periods.
- b. During peak production periods if it is rare, voluntarily performed, and compensated at the appropriate premium level established by law.

14.4 Members shall provide employees with all legally mandated public holidays and leave, including maternity and paternity, compassionate and paid annual leave. Where no applicable law exists, paid annual leave shall be provided in accordance with ILO Convention 132. Special leave or working time arrangements for employees with family responsibilities should apply to both men and women employees.

~~14.4~~14.5 Members shall provide all employees with a workday break in accordance with applicable law. If there is no applicable law, then members should provide employees with at least one uninterrupted work break if they work longer than 6 hours

Overview of main proposed changes

COP 26: Product disclosure: undisclosed synthetic diamonds



Diamond detection and disclosure - topic overview

Objectives

- Review need for minimum requirements on detecting undisclosed synthetic diamonds.
- Review disclosure requirements linked to the detection approach (claims).
- Consider key references

Why is it important?

- Growing concern that undisclosed mixing has become a serious problem for the jewellery industry.
- Technological advances in the production of synthetic diamonds make them more available and difficult to detect (particularly melee).
- Reliable systems, policies and procedures are needed to address the issue.

Changes to COP provisions

26.3 Members are required to take substantive and documented action to avoid the purchase and sale of undisclosed synthetic diamonds. As such, members sourcing diamonds shall apply the following:

- a. Obtain a written warranty from their suppliers to confirm that the parcels supplied to them do not contain undisclosed synthetic diamonds.
- b. Have effective policies, procedures, training, and monitoring systems in place to avoid the possibility of undisclosed synthetic diamonds being switched for natural diamonds at their facilities.
- c. Employ a documented due diligence process to identify and mitigate risks related to undisclosed synthetic diamonds entering their supply chain. Identify possible high-risk contamination points.

Changes to COP provisions

26.3 Members are required to [...] :

- d. Carry out testing of polished diamonds using a defined, credible and transparent protocol. This can be an existing industry accepted protocol, or one that is defined by the member. The protocol must:
 - Incorporate an appropriate approach for testing loose and set polished diamonds classified as high risk.
 - Include testing which can be in-house, using relevant and effective detection equipment, or outsourced to a qualified gemmological laboratory or other qualified external testing service provider.
 - Include testing at least once, at a point in your process where there is no risk of introduction of undisclosed synthetics before the sale of diamond parcels. This is normally just prior to sale.
 - The outcome of testing and the inclusion of referrals in sale of diamond parcels will be disclosed to the buyer.
 - The testing protocol must be disclosed to buyers, including the procedure for managing test referrals.

Topics for the guidance material

The guidance will provide advice and/or suggested implementation approaches for:

Creating effective policies and procedures

Developing internal training

Mapping risk in the diamond pipeline

Mitigating identified risks

Sampling

Approaches for testing

Overview of main proposed changes

COP 29-40: Mining



Mining

Objectives

- Overall review of mining provisions comparing with international frameworks.

Scope of research

- International Finance Corporation (IFC) Performance Standards and Equator Principles
- International Council on Mining and Metals principles and position statements
- Mining Association of Canada (MAC) 'Towards Sustainable Mining' (TSM) protocols and frameworks
- Others

Changes

- COP 30 Community engagement – mostly additions to guidance
- COP 31 Indigenous peoples and free prior informed consent - changes in structure of provision to clarify that FPIC is required
- COP 36 Biodiversity - clarifications
- COP 37 Tailings and waste rock – significant additions to guidance on avoiding dam failures
- COP 40 Mine rehabilitation and closure – more detail on closure funding

Overview of main proposed changes

Scope expansion – Coloured Stones

Coloured stones key points

- Scope – rubies, sapphires and emeralds
- Due diligence – same approach as for diamonds
- ASM (COP 7) – guidance reference to tools like CRAFT
- Product disclosure (COP 26)
- Grading analysis and appraisal (COP 28)



Product disclosure

26.1 Members shall not make any untruthful, misleading or deceptive representation

26.1 Members shall apply the following requirements

c. Treated coloured gemstones shall be disclosed as either “treated” or with specific reference to the particular treatment

d. Synthetic (or artificial) coloured gemstones shall be disclosed as “laboratory created”, “laboratory grown”, and/or “synthetic”. This applies to reconstructed and composite coloured gemstones.

e. Simulants of (or imitation) coloured gemstones shall be disclosed as the mineral or compound that they are

f. If describing the quality of polished coloured gemstones – this shall be in accordance with recognised guidelines.

g. Place of origin for coloured gemstones: When describing the place of origin of a stone, information on how this was determined shall be disclosed. The place of origin shall only be used when it denotes an area where gemstones have been mined.

Grading, analysis and appraisal

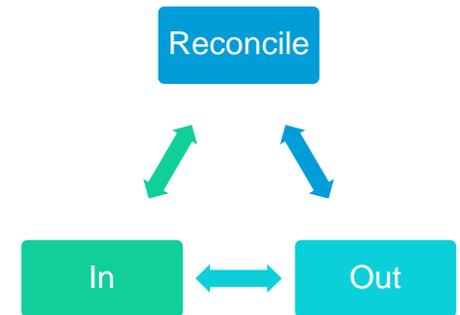
28.2 Members that generate place of origin reports for coloured gemstones shall have systems in place to ensure the consistency of the determination of origin. They shall also carry out detection of treatments and synthetics as part of the determination.

Scope expansion - silver

- **Silver**

Only minor additions on product disclosure (COP 26) and Cyanide (COP 38).

Other – need to review COP 27.4?



27.4 Members shall keep records of all Kimberley Process certificates and System of Warranties invoices received and issued, and have them audited and reconciled on an annual basis either as part of an RJC audit, or by an RJC accredited auditor during the certification period, or by a separate independent auditor, as suits the circumstances of the business. If asked for by a duly authorised government agency, these records must be able to prove compliance with the Kimberley Process.

- Important to keep records of KP certificates and SoW invoices
- Specify that members should have internal controls to reconcile KP certificates and SoW
- Are there any circumstances where an annual audit by a 3rd party is not required?
 - If number of diamonds handled is very low
 - If internal reconciliation and 1st party audit is strong



Next steps

Deadline for comment on Round Two: 1st July 2018

1. Consultation workshops and webinars (**May-July 2018**)
2. Review and publication of comments from round 2 (**July 2018**)
3. Feedback consolidated into final COP for approval by the RJC Standards Committee (**July 2018**)
4. Optional third round public consultation (**TBC**)
5. Executive Committee and Board to approve final COP standard (**Dec 2018**)
6. Publication of revised standard (**Jan 2019**)

Round 2 – please comment!

Proposed revisions to the COP standard, including key guidance sections [here](#), on the RJC website

COP review consultation plan

Date, location	Focus topic
16 April, Paris Workshop	Two sessions: a full COP consultation and one on coloured stones - completed
20 April, Antwerp Workshop	Full COP consultation with focus on diamond supply chain - completed
17 May, Webinar	Full COP consultation
31 May, Webinar	Refiner focused COP consultation
7 June, Webinar	Diamond focussed COP consultation
12-14 June, India Workshop	Full COP and coloured stones consultations (Mumbai and Surat)
16 July, New York Workshop	Full COP and coloured stones consultations
TBC, Dubai Workshop	Full COP consultation



Thank You

For further information:

Website: www.responsiblejewellery.com

Email: consultation@responsiblejewellery.com