RESPONSIBLE JEWELLERY COUNCIL

CERTIFICATE APPENDIX
Summary of Findings

DR. BERNHARD BURGER AG joined the RJC in 2013 within the precious metals trader, refiner and/or hedger forum. This is their fifth certification, based on an audit conducted on 25-26th June 2025. The below summary of audit findings complements the Member's current RJC certificate No 0000 6133.

Audit objective, activities, and methodology

The objective of the audit was to review the member's systems and processes to establish whether they conform to the RJC Code of Practices (COP) 2019. The audit activities included planning, conducting the audit and reporting on conformance, including corrective actions approval, as per the RJC Assessment Manual. The audit consisted of collecting / sampling and reviewing objective evidence including documentation, management and employee interviews, facility walk-through, and other observations, in relation to at least the previous 12 months.

The auditors confirm that:

- The information provided by the member is true and accurate to the best knowledge of the auditor(s) preparing the report.
- The findings are based on verified objective evidence relevant to the time period for the audit, traceable and unambiguous.
- The audit scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the member's defined certification scope.
- The auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

Description of Member Company

DR. BERNHARD BURGER AG was founded in 1997 by Dr. Bernhard Burger. The Member specialises in trading of semi-finished products (Halbzeuge), findings (Furnituren) and ring blanks, as well as the collection of refining material (Scheidgut) and residues (Gekrätz) and selling of refined gold, and on very small-scale wedding rings (some with diamonds). The Member deals in gold, silver, platinum, palladium, rhodium and diamonds. In many cases, the clients are goldsmiths and jewellers and as such, both supplier and buyer at the same time. The member's subsidiary Burger & Gyr Edelmetalle AG, included into the audit scope, refines and analyses the refining material and residues, as well as producing ring blanks.

No of sites audited:	Country/Countries:
2	Germany

Noteworthy achievements

- Health and safety and environment were focus areas. The member was very well supported by an external occupational safety specialist and company doctor, with regular health and safety meetings. The member focused on reducing use of natural resources and waste, by implementing energy saving systems such as compressor, LED lights, photovoltaic panels and hybrid company cars.

CODE OF PRACTICE 2019 PROVISIONS	RATING	COMMENTS / CONCLUSIONS
GENERAL REQUIREMENTS		
1 Legal Compliance (1.1)	Conformance	Commitments/Policies - Member was aware of applicable supra-national, national, state and local laws

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		in place of business operation and those related to implementation of all applicable COP provisions. Efforts/Practice – Member has established a management process to maintain awareness and ensure compliance with applicable laws, including laws for the implementation of COP provisions. Results/Outcomes - Based on the observed evidence during this audit, the Member was up to date with applicable laws.
2 Policy and Implementation (2.1; 2.2)	Conformance	Commitments/Policies - There were relevant policies addressing responsible business practices. There were overarching policies (e.g. Corporate Social Responsibility) and/or specific policies (e.g. Health and Safety or Modern Slavery) in place. Efforts/Practice - These policies were endorsed by senior management, regularly reviewed and communicated both internally and externally. Results/Outcomes - Adequate management processes to meet the COP requirements were in place.
3. Reporting (3.1)	Conformance	Commitments/Policies – The Member publicly issued reports on material and/or significant or relevant issues for its responsible business practices. This is done annually or more often (as per business needs). Efforts/Practice – The reports were understandable, organised, transparent and accessible. Results/Outcomes - Adequate management processes to meet the COP requirements were in place.
3 Reporting (3.2)	N/A	Not applicable to the Member's activity.
4 Financial Accounts (4.1; 4.2)	Conformance	Commitments/Policies - Financial statements of business transactions were prepared in accordance with applicable national or international standards. Efforts/Practice - A process of maintaining financial statements of business transactions in accordance with applicable national or international standards was implemented. The Member demonstrated that a third-party independent accountant reviewed the financial accounts (at least annually). Results/Outcomes - Adequate management processes to meet the COP requirements were in place for the preparation and maintenance of the financial statements.
RESPONSIBLE SUPPLY CHAINS, HUMAN RIGHTS AND DUE DILIGENCE		
5 Business Partners (5.1; 5.2)	Conformance	Commitments/Policies - There were management systems in place to identify, assess and engage with significant business partners to influence and/or promote responsible business practices, if and when required. Procedures were also implemented to identify, monitor, communicate, verify, and address non-conformances associated with the activities of contractors, indirectly employed workers, and other categories of business partners e.g. visitors. Efforts/Practice - Awareness and understanding of expectations of responsible business practices was observed in the member's business relationships and all

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		3-steps (identification, assessment and engagement) were in place. The management systems built on existing systems of monitoring, reporting and tracking of business partners in place to verify conformance with policies and procedures on relevant COP provisions, where appropriate. Results/Outcomes - Adequate management processes to meet the COP requirements were in place to promote responsible business practices amongst significant business partners.
6 Human Rights (6.1)	Conformance	Commitments/Policies – The Member had a policy endorsed at the highest level of management that reflected its operational human rights due diligence: identification, prevention, mitigation, remediation and communication practices. The policy and due diligence align and integrate with the OECD Guidance (COP Provision 7). Efforts/Practice - The policy, which was internally and externally communicated, described what and how the business practices human rights due diligence is conducted across all 4-steps: assessment of actual and potential human rights impacts, integrating and acting upon the findings, tracking responses and communicating the impacts. Results/Outcomes – The Member had an established systems to identify, track, collect, communicate the findings and seek and receive feedback from internal and external sources regularly. Member acted if found to cause, contribute or link to any human rights impacts. The response to affected stakeholders was efficient, accessible and integrated (e.g. performance contracts, surveys, audits, gender-segregated data, grievance mechanisms, as applicable).
7 Due diligence for responsible sourcing from Conflict-Affected and High-Risk Areas (7.1a; 7.1b; 7.2)	Conformance	Commitments/Policies – The Member's management systems align with the 5 steps of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs), and/or other RJC recognised frameworks as relevant to business size, complexity and materials in scope. The policy and due diligence align with COP Provisions 6, 8, 12 and 29. Transparent processes have been established to assess all internal inventory and transaction processes to identify material inputs, product classification, type and weight of material inputs and outputs, supplier details, including Know Your Counterparty (KYC). Efforts/Practice – OECD Step 1: The Supply Chain Policy (on Member's homepage) was internally and externally communicated and it aligns with Annex II of the OECD Guidance. There were adequate management systems in place with procedures for collecting information from suppliers and sharing it with buyers. Engagement with relevant business customers has occurred. Adequate tracking systems and records about sourced materials including its origin where appropriate, whether internally or from upstream suppliers including refiners / miners, if

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		relevant, was observed. Member defined CAHRAs, had an established process to identify risks and a grievance mechanism. Namely, for its diamond, gold and PGM supply chain, the Member has implemented a solid due diligence system which was in accordance with the OECD Due Diligence Guidance for CAHRAs and was appropriate to its size and circumstances. In addition, the Member has implemented the OECD Guidance Supplement on Gold applicable to their operations and supply chains. The Memebr's supply chain policy was embedded in the due diligence Code of Conduct document and publicly available. As per policy, sourcing from CAHRAs was not allowed. The member was buying and selling only polished diamonds and has adopted the World Diamond Council system of warranties (SOW). The Member's CEO was responsible for the due diligence management system including a system of controls and transparency over its supply chain. A digitally record keeping system (Enterprise resource planning - ERP) was installed and maintained, with digital supplier and customer files, including due diligence information stored for unlimited period. The Purchasing and Supply Chain Guidance Procedure (Due Diligence Process) described in detail the due diligence requirements for all materials in scope and sourced. That means that all suppliers were evaluated and checked regarding information on the product classification, type and weight of material inputs, KYC information and information on their due diligence systems. The origin of all materials was disclosed as per purchasing policy. As per KYC Policy, all business partners were verified against financial sanction lists. Supplier information was documented in a comprehensive and regularly updated Supplier Information database. Regular reviews, at least once per year, were conducted by the CEO. The Member has communicated its expectations for supply chain due diligence to suppliers and all suppliers needed to acknowledge and sign the Supplier Code of Conduct. The Member established long-term relationships with suppliers and customers. The Member had an effective grievance mechanism in place (whistleblowing system - Beschwerdeverfahren), managed by senior management. The grievance mechanism was independently operated and easy to access via homepage. OECD Step 2: The Member identified and assessed risks, including identification and mapping of red flags. Records were available to support risk assessment. Namely, the Member's Purchasing and Supply Chain Guidance Procedure (Due Diligence Process) required a risk assessment for contracted suppliers. The supplier review process included that mandatory documents were checked according to the required steps. In this context, a red flag check was carried out, and the result was documented in the supplier list. The Risk management plan for Supply Chain included a CAHRAs

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		check based on the RJC toolkit and recommended sources such as Heidelberg Conflict Barometer and Crisis Watch Global Conflict Tracker. There were due diligence checks (updates) of suppliers and supply chains taking place regularly at least on an annual basis or when the framework conditions change, including of their RJC certification status. OECD Step 3: Identified risks were reported to management, as applicable. A risk strategy has been developed and implemented to support management of risks, including any actions taken as per risks/red flags (if applicable). Performance against risk strategy was monitored. Namely, the Member's supply base was very small, and suppliers were based mainly in Germany. Serious risks or non-compliance with laws or due diligence guidelines by a supplier must be reported to the CEO. The CEO determined whether the identified risks could be reduced by continuing, suspending or terminating the relationship with the supplier. No inconsistencies were noted in the supply chain processes. No red flag suppliers and no high-risk transactions have been identified. The supply chain (source and origin) was clearly disclosed to the Member. OECD Step 4: Reasonable & good faith efforts to implement COP7 have been made, monitored, audited, learnt from and improved over time. A summary audit report is published, including conclusions, in collaboration with scheme owner. OECD Step 5: Verification and annual reporting were in place, with required elements publicly shared (see Due Diligence Report). Additional public documentation highlighting member's commitment to precious metal responsible sourcing was available (see Statement of Principles). Results/Outcomes – The Member has established accessible systems to understand and identify business partners and associated risks, assess and manage risks (if red flags are identified). The systems also support transparency, record-keeping, controls, identification of different types of materials (e.g. mined, recycled, grandfathered, as applicable), verification, monitoring and evaluation of improvements and public reporting on an annual basis.
7.3a Due diligence for responsible sourcing from Conflict-Affected and High-Risk Areas	Conformance	Commitments/Policies - Adequate internal and external material control systems have been established to reconcile movement of inventory in and out over a given time, for all material inputs and outputs. Efforts/Practice - A functional system has been established for the internal and external material control and reconciliation. Results/Outcomes - The system for internal and external material controls has been developed and actively implemented.
7.3b Due diligence for responsible sourcing	Conformance	Commitments/Policies - A process has been established for collecting and annually sharing information with the RJC on the types of gold sourced and, if applicable, mine

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from Conflict-Affected and High-Risk Areas		of origin of mined gold received. Where applicable, a list of mines of origin for all gold received, the identity of any mines of origin in CAHRAs and a summary of the criteria used to determine CAHRAs was included. Efforts/Practice - The process of collecting and sharing information with the RJC on the types of gold sourced and, if applicable, mine of origin of mined gold received, was developed and in place. Results/Outcomes - The process of collecting and sharing information with the RJC on the types of gold sourced and, if applicable, mine of origin of mined gold received was timely, consistent and collated on an annual basis. During the audit period, the Member did not source mined gold.
8 Sourcing directly from Artisanal and Small-Scale Mining (8.1)	N/A	Not applicable to the Member's activity.
9 Sourcing post-consumer industrial precious metals directly from informal recyclers (9.1)	N/A	Not applicable to the Member's activity.
10 Community Development (10.1)	Conformance	Commitments/Policies - There were adequate frameworks and approaches in place for regular discussion, consultation, and interaction with stakeholders and communities. The member demonstrated awareness of the requirements under national laws. Efforts/Practice – Adequate stakeholder and community engagement, stakeholder mapping and practical initiatives related to core business in place (e.g. trainings, employment and staff retention opportunities, investing in local financial institutions to support local procurement, educational programmes on natural resource management and monitoring, etc.) were in place. Results/Outcomes – The frameworks and systems for community development were appropriately implemented.
11 Bribery and Facilitation Payments (11.1; 11.2)	Conformance	Commitments/Policies - Written formal policies and procedures have been established. These prohibit bribery and corruption in the member's business practices and across the member's value chain. They protect employees from any penalty for disclosing such practices and have harsh penalties for violations. Procedures for accepting gifts from third parties were also in place. The Member has adopted a proactive approach to address corruption within their operations and supply chains. Efforts/Practice - These systems were appropriately implemented and functional. The policies have been endorsed at the highest level and a senior manager was in charge of anti-corruption programme. Awareness raising programmes for its business operation, as well as dealing with complaints have been established. The policies and approaches are reviewed at least annually, and risk management is adequate.

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		Results/Outcomes - Systems have been developed and implemented for the Member's business operation, and across its supply chains to identify, train, record, raise concerns, investigate, and penalise for violation of anti-corruption policies.
11 Bribery and Facilitation Payments (11.3)	N/A	There is no applicable law on facilitation payments in the jurisdictions where the Member operates.
12 Know Your Counterparty: Money laundering and finance of terrorism (12.1; 12.2; 12.3; 12.4)	Conformance	Commitments/Policies – The Member has established documented and adequate KYC policies and for business partners, The policies contained clear responsibilities, subject to regular reviews, and proper records were maintained. The polices align with applicable laws in the areas required by this COP provision (e.g., Anti-Money Laundering (AML), The Financial Action Task Force (FATF). Efforts/Practice - Documented procedures were established with activities to support the 4 areas (verification, identification, checks and monitoring). The procedures described the process for reporting suspicious cash related activities to the proper authorities for cash records. A responsible person for implementation of KYC policy and procedures has been appointed. Training and regular reviews (at least annually) of the KYC policy and procedures was established. Results/Outcomes - The 4-step system in place, was appropriate to verify identities of business partners, identify high-risk counterparts, check records and monitor and report on suspicious transactions.
13 Security (13.1; 13.2)		Commitments/Policies - There were adequate security policies and procedures in place that establish processes to identify structural and emerging security threats at various levels, and/or written policy or agreement on the conduct of security personnel. Efforts/Practice - A senior management function was in place for managing security risks for employees and other personnel, training, internal controls, regular consultations with stakeholders (government local enforcement, local communities) and monitoring the performance against the policies and procedures. Results/Outcomes - The policy for security risk assessments was appropriately implemented. A system has been established to identify security risks and address them. The policy that is used and applied is adequate and emphasises the need to respect human rights. Boundaries for security activities are set in contractual agreements.
13 Security (13.3; 13.4)	N/A	Not applicable to the Member's activity.
14 Provenance Claims (14.1; 14.2)	Conformance	Commitments/Policies - Policies and procedures have been established to make and manage of claims, including for credible and evidence-based provenance claim. Efforts/Practice - Employees, suppliers and other business partners received training and/or were updated regularly, in particular employees who deal with the implementation of the provenance claim as part of advertising, marketing and other sales-related and

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		relevant communication jobs. Control, reporting, and grievance mechanisms were adequately implemented. Results/Outcomes - The systems were appropriately implemented and used to identify, document, control, train, report, and address complaints related to provenance claims.
14 Provenance Claims (14.3)	N/A	Not applicable to the Member's activity.
LABOUR RIGHTS AND WORKING CONDITIONS		
15 General Employment Terms (15.1; 15.2; 15.3)	Conformance	Commitments/Policies - Adequate policies and procedures have been established related to employment relationship, as well as associated labour and social security. They align to relevant national and international standards and/or collective bargaining agreements and/or a policy on gender wage gap, as applicable. Efforts/Practice - All categories of employees had their employment terms (wages, working hours, other labour, and social security) and conditions documented, and in the language(s) and forms easily understandable to them. The Member had record-keeping systems in place, regularly updated and a system of checks and controls for employees of business partners (e.g. contractors, subcontractors, labour agencies). Results/Outcomes - A system has been appropriately implemented to issue, verify, check, and control the situation with general employment terms and conditions for all categories of workers.
16 Working Hours (16.1; 16.2; 16.3; 16.4; 16.5)	Conformance	Commitments/Policies - Policies and procedures have been established related to working hours, overtime, workday breaks, rest days, holidays and leave. This included processes to report on non-conformances, and a grievance policy for violations of any of the above. They align with relevant applicable laws and/or collective bargaining agreements and COP Provisions 16 (48 hours working week, 60 hours in total working week with overtime), 18.4, 19, and 21 or the provision which provides better protection. Efforts/Practice - Human resources management set and oversee working hours, overtime, workday breaks, rest days, holidays and leave entitlements. The procedures were documented, and worker timekeeping processes were in place. Regular communication about the grievance procedures to employees was established and their adherence enforced. Results/Outcomes - Relevant policies, procedures and system have been appropriately implemented that set and oversee working hours, overtime, workday breaks, rest days, holidays and leave entitlements.
17 Remuneration (17.1; 17.2; 17.3;17.4; 17.5; 17.6; 17.7; 17.8)	Conformance	Commitments/Policies – Policies and procedures have been established related to payment of legal minimum wage (not including overtime) or higher, as per prevailing industry standards, overtime wage, method of wage payments, prohibited deductions from wages, benefits, provisions, services and loans to workers. They align with applicable laws, COP Provisions 1, 16, 20, 22.1 and 23.6 and are non-discriminatory (equal pay for equal work).

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		Efforts/Practice – Human resources management set and oversee wages, overtime wages, methods of wage payments, prohibition of illegal deductions from wages, benefits, provisions, services and loans to workers. Procedures, training and records were kept, implemented and communicated to workers, in a timely, regular and accessible way. Results/Outcomes – Relevant policies, procedures and system have been appropriately implemented that set and oversee minimum wages and overtime payments, methods of wage payments, prohibitive/illegal deductions, benefits, provisions, services and loans.
18 Harassment, discipline, grievance procedures and non-retaliation (18.1; 18.2; 18.3; 18.4; 18.5)	Conformance	Commitments/Policies - Integrated or stand-alone policies and procedures have been established related to zero tolerance of all forms of violence and harassment in the workplace (including gender-based violence), no matter of its severity, and they cover all types of workers. The policies and procedures also covered preventing retaliation for raising concerns at work, receiving and addressing grievances, conducting investigation and disciplinary processes and ensuring appropriate record-keeping. These align with applicable laws, as well as relevant COP Provisions 2, 6, 7, 17. Efforts/Practice - Dedicated human resources management (separate from those dealing with external grievances and complaints) has been established to set and oversee the implementation of these policies and procedures. Relevant regular training for supervisors and workers of all categories, including key staff (e.g., doctors, nurses, key personnel among security staff, etc.) was underway. There were adequate and up-to-date record-keeping of procedures and investigations, and efficient communication to all workers and supervisors. Results/Outcomes - Relevant policies, procedures and system have been appropriately implemented and resulted in a positive work environment without violence and harassment, including oversight of non-retaliation, grievance and investigation processes and relevant trainings to key personnel.
19 Child Labour (19.1; 19.2)	Conformance	Commitments/Policies - Integrated or stand-alone policies and procedures prohibiting the use of child labour, including worst forms, and preventing young workers from doing hazardous work have been established. These include provisions for the remediation of child labour impacts, controls during hiring processes and/or to ensure maintenance of up-to-date employment records. They align with the ILO Conventions 138 and 182 and Recommendations 146 and 190 on minimum age for work and worst forms of child labour and requirements of the COP Provisions 6, 7, 8 and applicable laws. Efforts/Practice - Dedicated senior management (human resources) has been appointed. Adequate and regular communication of the labour policy has been conducted to all direct and indirect workers and business partners. Risk assessment and remediation procedure have been

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		implemented. A heightened risk-based approach has been applied when working with labour or recruitment agencies, and hiring personnel. This included regular reviews and training on this aspect. The issues of minimum age and child labour have been integrated into the enforcement aspects of COP Provisions 6, 7, 8 requirements as relevant. Results/Outcomes - Relevant policies, procedures, system and remediation process have been appropriately implemented to ensure conformance with prohibition of child labour and respect of minimum age for employment.
19 Child Labour (19.3)	N/A	Not applicable to the Member's activity.
20 Forced Labour (20.1; 20.2; 20.3)	Conformance	Commitments/Policies - Integrated or stand-alone policies and procedures prohibiting forced labour, including all its forms, have been established. They align with relevant applicable laws, regulations and standards and requirements of the COP Provisions 6, 7, 13, 15, 17 and 18, as relevant. Efforts/Practice - Dedicated senior management (human resources) has been appointed. Communication of expectations to all business partners in the supply chain has been conducted. Clear standard employment contracts and grievance procedures have been communicated in writing and via trainings/sessions, and regular risk assessment of contractors, suppliers and/or labour providers, formal audits and desktop reviews of policies and procedures were in place. Results/Outcomes - Relevant policies, procedures, systems have been appropriately implemented to ensure conformance with prohibition of forced labour in all forms.
21 Freedom of association and collective bargaining (21.1; 21.2)	Conformance	Commitments/Policies - Integrated or stand-alone policies and procedures have been established for respecting freedom of association and collective bargaining process/agreement, and prohibiting discrimination against members of unions or alternative organisations allowed under applicable law. They align with relevant applicable laws and standards and requirements of the COP Provisions 16, 17, 18 and 22, where relevant and allowed under applicable law. Efforts/Practice - Dedicated senior management (human resources) has been appointed to oversee this area. There was adequate review of non-discrimination aspects in hiring, terminating and performance review process. Functioning grievance processes to address any workers concerns, including discrimination against any union/alternative organisations' members have been implemented. Communication of the rights of workers to form and/join trade unions or alternative organisations of their choice and collective bargaining process/agreement, as allowed under applicable law, has been conducted. Results/Outcomes - Relevant policies, procedures, systems have been appropriately implemented to ensure conformance with workers' rights to associate

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		freely, to access grievance mechanisms and engage in collective bargaining process/agreement, as allowed under applicable law.
21 Freedom of association and collective bargaining (21.3)	N/A	Not applicable to the Member's activity.
22.1 Non-discrimination	Conformance	Commitments/Policies - Integrated or stand-alone policies and procedures have been established for prohibiting discrimination in the workplace and they align with relevant applicable laws and standards and requirements of COP Provision 18, where relevant. Efforts/Practice - Dedicated senior management (human resources) has been appointed to oversee non-discrimination. There were regular risk assessments of operations, particular occupations, categories of workers, review of hiring, termination, promotion and performance appraisals for this aspect, regular trainings and awareness raising among workers, business partners, suppliers. Results/Outcomes - Relevant policies, procedures, systems have been appropriately implemented to ensure conformance with non-discrimination in the workplace.
HEALTH, SAFETY AND ENVIRONMENT		
23 Health and Safety (23.1; 23.2; 23.3; 23.4; 23.5; 23.6; 23.7; 23.8; 23.9)	Conformance	Commitments/Policies - Policies and procedures have been established to regulate safe and healthy working conditions and workplaces, including risk assessments and controls of occupational hazards, safe, decent and non-discriminatory facilities at work and on-site housing, where relevant (e.g. food, water, sanitation, fire equipment, emergency exits and lighting etc.), health and safety committees, personal protective equipment, access to adequate first aid / medical facilities and trained personnel, accessible emergency procedures and evacuation plans, incident investigations, employee training and record-keeping. These align with relevant applicable laws and standards and requirements of COP Provisions 6, 22, 24, 28 and 40, where relevant. Efforts/Practice - Dedicated health and safety person and/or appropriate people in member's business have been appointed to oversee all aspects of occupational health and safety and/or adequate arrangements for safe and healthy workplace, access to safe, decent and non-discriminatory facilities at work, record-keeping of regulations, permits, codes and licences. Workplace hazards associated with the member's activities and products have been identified and risk assessed. Controls to minimise the risks of accidents and injury to employees, including providing and correctly using personal protective equipment, as applicable, have been implemented. This includes access to adequate first aid / medical facilities and trained personnel. Mechanisms have been established for health and safety committees, by which employees can raise and discuss health and safety issues with management. Incident investigations had taken place and a process to carry out reviews of relevant hazard controls based on investigation results,

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		to identify opportunities for improvement was in place. The Member had established emergency procedures and evacuation plans that were accessible, regularly tested and periodically updated. Employee training (and record-keeping) was being conducted in a form and language workers understand on specific role-related health and safety hazards and controls, appropriate action in the event of an accident or emergency, fire safety and emergency procedures. Results/Outcomes - Relevant policies, procedures, protocols, system, and mechanisms have been appropriately implemented that set, oversee, monitor, and control the conformance with safe and healthy working conditions and workplaces.
23 Health and Safety (23.10)	N/A	Not applicable to the Member's activity.
24 Environmental Management (24.1; 24.2)	Conformance	Commitments/Policies - Integrated or stand-alone policies and procedures have been established that clearly state commitment to environmental management, specify responsibilities and control measures, life cycle thinking to continuous improvement, establish training format and/or frequency and how information is communicated to relevant employees about environmental risks and controls. These align with applicable national and international standards and COP Provisions 2, 23.3, 24.2, 25, 26, 27, 34 and 38, as appropriate. Efforts/Practice - Adequate environmental management systems were implemented, with senior management oversight in place. The system adopted Plan-Do, Check-Act cycle (assess risks and impacts, check legal conformance, set targets, identify options, monitor, measure, and report on processes). Regular training and communication have been conducted for relevant employees (direct and indirect) about environmental risks and controls, in a format and language that workers can easily understand. Results/Outcomes - Relevant policies, procedures and systems for environmental management have been appropriately implemented to manage environmental risks and impacts.
25 Hazardous Substances (25.1; 25.2; 25.3)	Conformance	Commitments/Policies - Policies and procedures have been established for the handling, use, storage, and disposal of hazardous substances, including use of alternatives in the member's business processes, and for maintaining inventory records and up-to-date accessible safety data sheets (or equivalent). They include a ban on manufacture, trade or use or specify a phased-out approach in use of chemicals and hazardous substances subject to international bans. They align with relevant applicable laws and standards and COP Provisions 23 and 24, as appropriate. Efforts/Practice - Adequate management systems to enforce policies and procedures and maintain inventory system and controls, including international ban of chemicals and hazardous substances were in place. Regular review of international agreements was being conducted particularly for substances subject to a phased-out program. Procurement of hazardous

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3RD FLOOR, HIND HOUSE, 2-3 HIND COURT, LONDON, EC4A 3DL, UNITED KINGDOM.

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CODE OF PRACTICE 2019 PROVISIONS	RATING	COMMENTS / CONCLUSIONS
		substances was from legitimate commercial suppliers. A responsible dedicated manager has been appointed for keeping inventory up-to-date and safety data sheets (or equivalent) accessible. The use of alternatives to hazardous substances, wherever technically feasible and economically viable, was also considered. Coordination with other relevant environmental and health and safety parts of business, as well as trainings for all relevant workers and proper and regular communication of policies, procedures, risks and operations was in place. Results/Outcomes - Relevant policies, procedures and systems have been appropriately implemented to handle, use, store, control, dispose, keep records and communicate risks of hazardous substances, including those which are subject to international bans and use of alternatives.
26 Wastes and Emissions (26.1; 26.2)	Conformance	Commitments/Policies - Policies and procedures have been established to identify, monitor and control significant wastes and emissions to air, water and land generated in the member's business processes, with clearly defined roles and responsibilities. These align with relevant applicable laws and standards and COP Provisions 24 and 27. Efforts/Practice - Adequate environmental management systems to identify, manage and quantify significant wastes and emissions to air, water and land, were observed to be in place and aligned with COP Provision 24. Trends were being monitored over time and used to drive continuous improvement in environmental performance. The system adopted the 4R of waste management (reduce, reuse, recycle and recover, followed by disposal of any residual waste safely) and the mitigation hierarchy, as described under COP 24 (avoid or anticipate, minimise, restore and offset). Results/Outcomes - Relevant policies, procedures and systems for identification and management of significant wastes and emissions to air, water and land have been appropriately implemented.
27 Use of Natural Resources (27.1; 27.2; 27.3)	Conformance	Commitments/Policies - Programs for the identification, monitoring and efficiency initiative(s) have been established for energy (including renewable) and water use, as well as other significant natural resources used (e.g. forest products and plastics). These align with relevant national frameworks, targets, and/or applicable laws (e.g. EU Directive 2014/95/EU to include non-financial statements in annual reports, as applicable) and COP Provisions 3, 24.1 and 26. Efforts/Practice - Adequate systems were in place to monitor energy (including renewable) and water use, identify other significant natural resources used (e.g. forest products and plastics) and enforce efficiency initiatives. The systems adopted the 4 steps to calculate and improve energy (including renewable) and water use in business operations (i.e. identification, prioritisation, implementation and review steps). A responsible manager has been appointed to implement initiatives.

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		Results/Outcomes - The initiatives and the system to calculate and improve the use of energy (including renewable), water and the use of other significant natural resources have been appropriately implemented.
27 Use of Natural Resources (27.4)	N/A	Not applicable to the Member's activity.
GOLD, SILVER, PGM, DIAMOND AND COLOURED GEMSTONE PRODUCTS		
28 Product Disclosure (28.1; 28.2a; 28.2b; 28.2h; 28.3)	Conformance	Commitments/Policies - Policies, procedures and registers on product disclosure have been established, covering all materials or products in scope, that explain relevant laws, regulations and industry standards, including penalties for non-conformance. These cover representation of materials and products, in selling, advertising and/or marketing, in accordance with applicable law (COP 1) regarding false and misleading representations and with internationally accepted standards. Documented due diligence, including protocols for testing polished diamonds and/or prevention of undisclosed synthetic diamonds entering their supply chain, was also in place, aligned with Provisions COP 7 and 13. Efforts/Practice - Adequate systems were observed to be in place that enforce accurate representations in the selling, advertising and/or marketing of materials and products, as well as accurate record-keeping of all stages, especially during processing stage. Physical characteristics of materials and products in scope were observed to be accurately accrued and disclosed, in particular the fineness or content of gold, silver and PGM, as well as use for and description of plating, and the size or carat weight, colour, clarity or cut of diamonds, as required by law, if in scope. Use of quality marks was in accordance with applicable law or industry standards. A senior manager has been appointed to regularly monitor implementation of applicable laws, regulations and guidance, internal policy, procedures, and register. Employees with relevant responsibilities have received training and/or were updated regularly regarding the expected processes to follow. Results/Outcomes - Relevant policies, procedures, registers and systems to enforce accurate representations, and record-keeping have been appropriately implemented.
28 Product Disclosure (28.2c-j, except h)	N/A	Not applicable to the Member's activity.
29 Kimberly Process Certification Scheme and World Diamond Council System of Warranties (29.1; 29.3; 29.4)	Conformance	Commitments/Policies – Policies and procedures have been established, which clearly prohibit knowingly buying or selling conflict diamonds or helping others to do so, in compliance with Kimberley Process Certification Scheme (KPCS) and/or World Diamond Council System of Warranties (SoW), as applicable. Efforts/Practice - Adequate systems were observed to be in place that prevent transactions of diamonds coming from suspect sources, unknown suppliers or countries that fail to observe KPCS and SoW requirements. A senior manager has been appointed to

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		regularly monitor implementation of applicable regulations and guidance, internal policy and procedures. Employees with relevant responsibilities have received training and/or were updated regularly regarding the expected processes to follow. Results/Outcomes - Relevant policies, procedures and systems to enforce compliance to KPCS and SoW have been appropriately implemented.
29 Kimberly Process Certification Scheme and World Diamond Council System of Warranties (29.2)	N/A	Not applicable to the Member's activity.
30 Grading, analysis and appraisal (30.1; 30.2; 30.3; 30.4; 30.5; 30.6)	N/A	Not applicable to the Member's activity.
RESPONSIBLE MINING		
31 Extractive Industries Transparency Initiative (31.1; 31.2)	N/A	Not applicable to the Member's activity.
32 Stakeholder Engagement (32.1; 32.2; 32.2)	N/A	Not applicable to the Member's activity.
33 Indigenous Peoples and Free Prior Informed Consent (33.1; 33.2; 33.3)	N/A	Not applicable to the Member's activity.
34 Impact assessment (34.1; 34.2; 34.3)	N/A	Not applicable to the Member's activity.
35 Artisanal and Small-Scale Mining and Large-Scale Mining (35.1)	N/A	Not applicable to the Member's activity.
36 Resettlement (36.1)	N/A	Not applicable to the Member's activity.
37 Emergency response (37.1)	N/A	Not applicable to the Member's activity.
38 Biodiversity (38.1; 38.2; 38.3; 38.4; 38.5)	N/A	Not applicable to the Member's activity.
39 Tailings and waste rock (39.1; 39.2; 39.3; 39.4)	N/A	Not applicable to the Member's activity.
40 Cyanide (40.1)	N/A	Not applicable to the Member's activity.
41 Mercury (41.1; 41.2)	N/A	Not applicable to the Member's activity.
42 Mine rehabilitation and closure (42.1; 42.2; 42.3; 42.4)	N/A	Not applicable to the Member's activity.

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