



RESPONSIBLE
JEWELLERY
COUNCIL

COMPLAINTS AND GRIEVANCE MECHANISM

V3.0 SEPTEMBER 2026

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

The Responsible Jewellery Council (RJC) is a not-for-profit standard-setting organisation founded in 2005. The RJC plays a crucial role in promoting responsible practices and ethical standards within the jewellery and watch industry, bringing together member companies of all sizes, from mining to retail. The RJC aims to build trust, transparency and sustainability across the entire jewellery and watch supply chain, ultimately benefiting consumers, communities and the environment. This is achieved through the RJC Code of Practices (COP), the RJC Laboratory Grown Materials Standard (LGMS) and the RJC Chain of Custody (COC), collectively referred to as the RJC standards, and through third-party certification and collaborative initiatives.

The RJC's assurance system works to ensure a robust and credible evaluation process that supports members to implement and maintain the RJC standards as a pathway to addressing sustainability best practices, responsible sourcing and supply chain due diligence.

This is a version-controlled document and the RJC reserves the right to revise it based on implementation experience and emerging good practice, as well as alignment with other relevant RJC documents. The official language of the RJC is English. Translations of various relevant RJC documents are available in a range of languages and are published on the RJC website (www.responsiblejewellery.com), as applicable. In the case of inconsistency between versions, reference shall default to the official-language version.

ENQUIRIES, FEEDBACK OR COMPLAINTS

If you have any enquiries or feedback on this document, please contact:

Email: complaints@responsiblejewellery.com Telephone: +44 (0)20 7321 0992

Any complaints or grievances, including relating to this document, can be submitted through the RJC Complaints and Grievance Mechanism: www.responsiblejewellery.com/contact-rjc/#complaints or by telephone: +44 (0)20 7321 0992.

DISCLAIMER

No guarantee, warranty or representation is made as to the accuracy or completeness of this document and other documents or information sources referenced in it. Use of this document is not intended to, nor does it replace, contravene or otherwise alter the requirements of any applicable national, state or local governmental statutes, laws, regulations, ordinances or other requirements. If the complaint or grievance that you are submitting is potentially a violation of civil or criminal law, then you should consider taking appropriate expert advice and reporting the matter to the relevant authorities. In certain circumstances the RJC may also have a duty to report such potential violations.

While this document should not be regarded as a complete and authoritative statement on any of the topics covered by it, the requirements enclosed herein are obligatory for complainants and respondents who are parties to any complaint/grievance. Use of this document is neither intended to, nor does it, create, establish or recognise any legally enforceable obligations or rights against the RJC and/or its members or signatories/stakeholders.

The RJC does not accept liability for any violations of applicable law or any infringement of third-party rights (each a breach) by other organisations, even where such a breach arises in relation to, or in reliance on, any RJC standard, document or other material, recommendation or directive issued by or on behalf of the RJC. The RJC gives no undertaking, representation or warranty that compliance with an RJC standard, document or other material, recommendation or directive issued by or on behalf of the RJC will result in compliance with any applicable law or will prevent any breach from occurring.

The Responsible Jewellery Council is the trading name of the Council for Responsible Jewellery Practices Ltd, which is registered in England and Wales with company number 05449042.

INTRODUCTION

A. ABOUT THIS DOCUMENT

This document establishes the RJC Complaints and Grievance Mechanism (hereafter, 'Complaints Mechanism' or 'Mechanism'), which enables the fair, predictable, rights-compatible and transparent resolution of complaints and grievances (hereinafter, 'complaints') raised with the RJC. The Mechanism defines how the RJC responds to them and serves as a legitimate and effective channel for affected individuals and communities to raise concerns early, openly, with due protection and in a manner that is respectful of human rights.

While the RJC reserves the right to make necessary revisions as part of continuous improvement, it shall consult with affected stakeholders, as per the RJC Assurance System Change Protocol (www.responsiblejewellery.com/standards/assurance), regarding any changes that impact the fairness, accessibility, predictability and transparency of this Mechanism.

B. STATUS AND EFFECTIVE DATE

The RJC Complaints and Grievance Mechanism version 3.0, published and effective in September 2026, was approved by the RJC Board in August 2026 and supersedes the previous version (version 2.0, December 2020).

Document version	Publication date	Implementation date	Summary of changes
3.0	September 2026	September 2026	• Restructure • Enhanced details for prior participation • References to the RJC Incident Handling Procedure added • Removal of costs for Complainant (e.g. translating a complaint and associated documents in English, any investigation/appeal cost, etc.) • Dialogue with the RJC added as an option for complaints about the conduct of the RJC • Revised in accordance with the RJC Certification Process Requirements for Certification Bodies and Auditors, the Member Certification Handbook and the ISEAL Code of Good Practice for Sustainability Systems version 1.1.
2.0	December 2020	December 2020	• More structured and formalised process (step-by-step clarity) • Governance links and integration with other RJC systems • Enhanced admissibility criteria and evidence requirements • Expanded whistleblower protections and complaint handling
1.0	2012	2012	Initial issue for use

C. SCOPE OF THIS DOCUMENT

All RJC members, approved certification bodies and their auditors shall submit to the Mechanism outlined in this document and be bound by the decisions of the RJC as a condition of RJC membership and participation in RJC activities. The scope of this document excludes consumer complaints as per clause 6.2.4, as well as complaints raised regarding RJC employees, workers and contractors (including consultants), which will be appropriately considered under RJC internal procedures and expectations.

Any legal allegations/matters/proceedings are outside the scope of this Mechanism and fall within the jurisdiction of the relevant authorities. In such cases, the Complainant must consider taking appropriate expert advice and reporting the matter directly to the relevant authorities. This Mechanism does not replace or limit access to legal or other non-legal remedies (e.g. national human rights commissions, multi-stakeholder initiatives), or the right of any individual to pursue legal action through the courts or other competent authorities, and does not prevent affected people(s) from accessing these remedies.

Where a complaint or grievance is the subject of ongoing or pending legal proceedings, the RJC shall refrain from applying this procedure, other than requesting information or explanatory statements from affected parties within the remit of this Mechanism, until the final determination of such proceedings.

RJC members and approved certification bodies are required to inform the RJC at the earliest opportunity should they become the subject of legal proceedings relevant to their certification and accreditation scope.

RJC members and approved certification bodies shall maintain their own complaints and grievance mechanisms. The requirements for these are established in the RJC standards for members (e.g. COP 2024, LGMS 2025) and the RJC Certification Process Requirements for Certification Bodies.

D. TERMS AND DEFINITIONS

Appeal: A formal request to the RJC that seeks reconsideration of the outcome of this Mechanism, such as, but not limited to, the loss of RJC membership or RJC approval

Appellant: The entity requesting reconsideration of the outcome of a complaint according to the Complaints and Grievance Mechanism

Certification body (audit firm): An independent third-party certification body that has applied for, obtained and maintained approval to conduct RJC evaluation activities and manage RJC certification

Complaint: A formal expression of dissatisfaction made by a Complainant to the RJC

Complaints and grievances panel: A group that may be convened to undertake an investigation under the RJC Complaints Mechanism (see panel composition under Section 6.4, Investigation)

Complainant: Any individual or organisation filing a complaint as per Section 2 of the Complaints and Grievance Mechanism

Enquiries: Requests for information, clarification or guidance relating to the RJC, its standards, systems or procedures that do not raise concerns about potential non-conformance

Feedback: Comments, opinions, suggestions or observations provided by stakeholders regarding the RJC, its standards, systems or procedures that do not constitute a complaint under the Mechanism

Grievance: A formal allegation or concern raised by an individual or group about an adverse impact on their rights or well-being. This may include complaints and incidents.

Incident: Any reported, suspected or actual wrongdoing that threatens the reputation and/or integrity of the RJC and/or the industry, its standards or its members and is not admissible under the Complaints and Grievance Mechanism as a complaint

Incident Handling Procedure: A separate RJC procedure that governs how incidents are handled

Independent third parties: External individuals or organisations that are not involved in the events giving rise to the complaint and are free from any actual or perceived conflicts of interest, and who are engaged to investigate or assess complaints in an impartial, objective, fair and rights-compatible manner

Parties to the complaint: The Complainant and Respondent, and other interested stakeholders, depending on the nature of the complaint

Prior participation: The principle requiring Complainants to first use available mechanisms closest to the source of harm prior to escalation (also referred to as prior engagement)

Respondent: The RJC, an RJC member, certification body, auditor, or oversight body against whom a complaint is lodged

Unreasonable Complainant actions: Those that by their nature, frequency or intensity materially disrupt or impair the RJC's complaints process. These unreasonable actions can impede either the administration or investigation of complaints in general, or a specific complaint. Such behaviour may occur at any stage of the complaints process. Please refer to the RJC Glossary (www.responsiblejewellery.com/glossary) for a full definition.

Whistleblower: A person, typically an insider, who has gained information through their work or other interaction, and who reports misconduct regarding any kind of information or activity, where they are directly affected by the matter in question or they fear and may face risk of retaliation by coming forward. This can include private individuals, suppliers, customers, NGOs, CSOs or trade unions and their representatives.

Working days: Working days in England. Please note public/bank holidays, as defined at www.gov.uk/bank-holidays, are excluded when counting working days.

For other terms, definitions and acronyms, please refer to the RJC Glossary: www.responsiblejewellery.com/glossary.

The following definitions, aligned with the International Organization for Standardization (ISO), apply in understanding how to implement this document:

- 'Shall' indicates a requirement.
- 'Should' indicates a recommendation.
- 'May' is used to indicate that something is permitted.
- 'Can' is used to indicate that something is possible, e.g. that a company or individual is able to do something.

¹ The RJC has adopted the principles and guidance of the United Kingdom's Local Government and Social Care Ombudsman in identifying unreasonable complainant actions: www.lgo.org.uk/information-centre/information-for-organisations-we-investigate/councils/good-practice-guides/managing-unreasonable-actions-by-complainants-a-guide-for-organisations.

1. PRIOR PARTICIPATION/ENGAGEMENT

- 1.1.** Prior to submitting a complaint to the RJC, the Complainant shall make all reasonable attempts to resolve their complaint at the lowest, most appropriate level (prior participation/engagement). This means that the Complainant shall first submit the topic of the complaint to the appropriate Respondent directly involved, giving them an opportunity to respond and/or rectify the situation, and allow an appropriate amount of time to pass, as established by the Respondent's own documented procedures for complaint handling. Should prior participation apply and not be fulfilled, see clause 6.2.22.

Note: Whistleblowing cases are exempt from this requirement.

- 1.2.** Complaints may be escalated to the next responsible Respondent if the final decision of the complaint is considered unsatisfactory or no action has been taken on the complaint within the established timelines as per the previous Respondent's documented procedures for complaint handling.

Note: See Figure 1, Respondents and the path of escalating complaints, for an overview of the point of submission and chain of escalation, and Table 1, Examples of complaint topics and prior-participation channels, before escalating the formal complaint to the RJC.

- 1.3.** Complaints about RJC members shall be addressed to the member in the first instance.

- 1.3.1.** Complaints addressed to RJC members may be escalated to the following:

Complaints about certified members, including where certification has lapsed: The complaint may be escalated first to the certification body responsible for the member's current or last certification, as applicable, and depending on the timing of the alleged conduct; then to the accreditation body/assurance provider and, as a final stage, to the RJC.

Complaints about all other members (uncertified members – understood as members within two years of joining who have not yet achieved certification; association members): The complaint may be escalated to the RJC.

Any escalated complaints about uncertified members' compliance with the RJC standards and certification requirements received before they achieve initial certification shall be referred by the RJC to the selected certification body once the initial audit is scheduled, as prior participation.

- 1.4.** Complaints about RJC-approved certification bodies or individual auditors shall be addressed to the certification body in the first instance.

- 1.4.1.** Complaints addressed to RJC-approved certification bodies may be escalated to the RJC's accreditation body/assurance provider and, as a final stage, to the RJC.

- 1.5.** Complaints about the RJC's accreditation body/assurance provider shall be addressed to the accreditation body/assurance provider in the first instance.

- 1.5.1.** Complaints addressed to the accreditation body/assurance provider may be escalated to the RJC.

- 1.6.** The RJC may choose to waive the prior-participation requirements if the case is particularly egregious or reputationally sensitive as determined by the RJC.

- 1.7.** The Complainant shall provide evidence of prior participation and associated outcome(s) upon escalating the complaint to the RJC.

- 1.8. If requested, the RJC can provide interpretation of standards and assurance requirements to RJC-approved certification bodies and the RJC's accreditation body/assurance provider as part of their own processing of complaints.

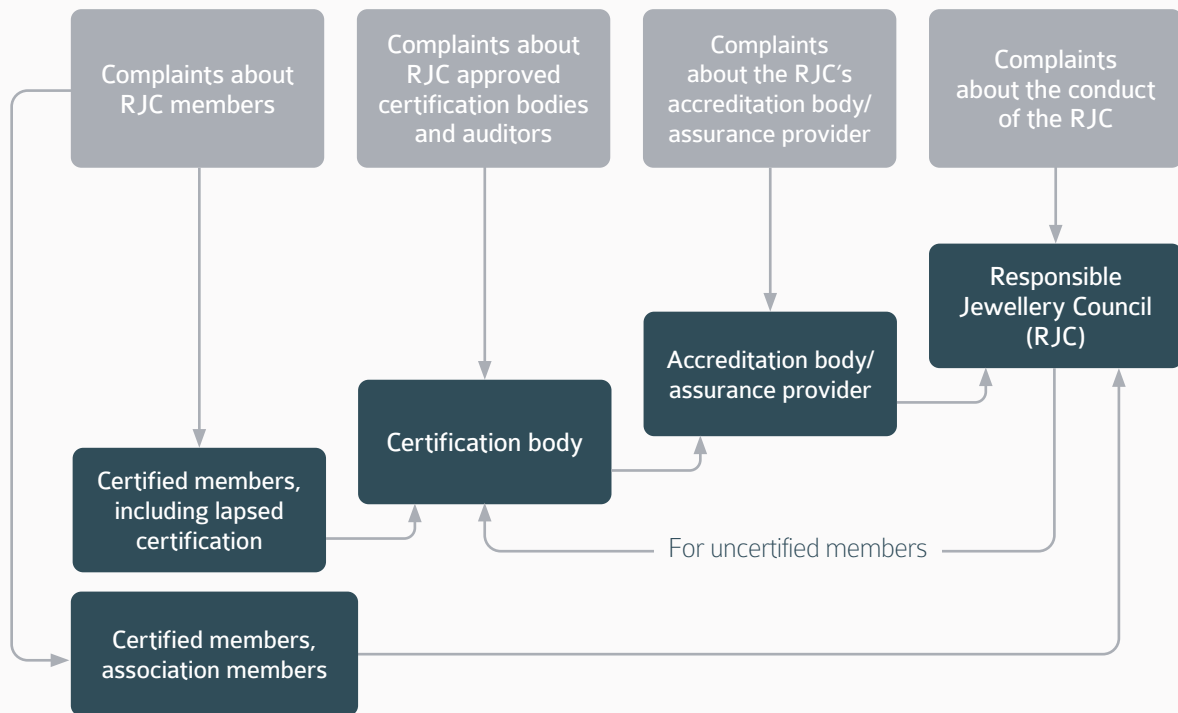


Figure 1: Respondents and the path of escalating complaints

Table 1: Examples of complaint topics and prior-participation channels

Example complaint topics	Prior-participation channels
Conduct of auditor (e.g. alleged poor competence or conduct during evaluation activities)	Raise the complaint directly with the approved certification body of which the auditor is an employee or contractor
Conduct of an employee of a member (e.g. during the audit process or in general interactions with other parties)	Raise the complaint directly with the member organisation to allow the opportunity to clarify and/or rectify
Certification status of a member or entity under the control of a member (e.g. alleged nonconformity with the RJC standards, or inadequate implementation of corrective action plans)	- Raise the complaint directly with the member organisation to allow the opportunity to clarify and/or rectify - Raise the complaint with the certification body
Approval status of a certification body to provide RJC certification services	Raise the complaint directly with the approved certification body and/or accreditation body and assurance provider
Oversight of a certification body by the accreditation body and assurance provider	Raise the complaint directly with the RJC's accreditation body and assurance provider

2. WHO MAY BRING A COMPLAINT?

- 2.1.** Complaints may be submitted by the following:
- 2.1.1. Any party with a complaint or grievance that is admissible under clause 6.2 of this Mechanism. This includes individuals, communities, unions, NGOs, companies, investors or any other third party with a legitimate interest.
 - 2.1.2. RJC members and/or their business partners and counterparties, as well as RJC members' employees. This includes any directly or indirectly employed workers who work regularly at a member's site, who may work under a contract of employment, service or apprenticeship on a permanent, temporary, full-time, part-time, casual, homework or seasonal basis.
 - 2.1.3. Approved certification bodies, including their employees and those acting on their behalf or engaged by the certification bodies.

3. HOW TO SUBMIT A COMPLAINT TO THE RJC

- 3.1.** Complete the RJC Complaints and Grievances Form available at www.responsiblejewellery.com/contact-rjc/#complaints and submit it to the RJC in one of the ways below:
- 3.1.1. Email complaints@responsiblejewellery.com with the completed complaint form and copies of supporting evidence.
 - 3.1.2. Post a hard copy of the completed complaint form, and any supporting documentation, to the address below:
Compliance Assurance Department
Responsible Jewellery Council
United Kingdom
Full address available at www.responsiblejewellery.com/contact-rjc.
- 3.2.** Telephone enquiries may be made to seek guidance on the submission process, request access to a copy of the form (e.g. via postal mail, etc.) or for submission of oral complaints, and can be anonymous, if preferred: +44 (0)207 321 0992.
- 3.3.** To ensure accessibility, complaints, grievances and supporting evidence may be submitted in any language.

4. SUPPORTING EVIDENCE

- 4.1.** Complaints shall be submitted with supporting credible qualitative and/or quantitative evidence, such as:
- 4.1.1. documentation and records.
 - 4.1.2. personal knowledge, observations and/or statements of fact.
 - 4.1.3. Where possible, for complaints and grievances relating to a member's conformity to the RJC standards, the complaint should reference the specific standard requirement concerned and the outcome of the complaints process of the certification body, where applicable.
- 4.2.** Complaints shall be submitted with legible and verifiable copies of supporting evidence only, not originals, as the RJC cannot guarantee their return.

5. COMPLAINTS MECHANISM OVERVIEW

- 5.1.** Complaints are processed in accordance with the Mechanism through admissibility assessment, dialogue with the RJC (if the complaint is related to the conduct of the RJC), referral to the Respondent (for complaints where prior participation is applicable and has not been completed) and actions, including investigation, within the time frames set by the Mechanism.

Figure 1 provides an overview of the Complaints Mechanism process. The process is detailed further in Section 6.

Note: Complaints may not necessarily be subject to all steps and may conclude earlier.

- 5.2.** The complaints process and its outcomes shall aim to restore affected individuals' rights and dignity, address root causes and prevent future recurrence.
- 5.3.** The RJC shall not take retaliatory or discriminatory action against any individual who reports concerns in good faith.
- 5.4.** All RJC members and stakeholders involved in the Mechanism shall refrain from retaliatory actions.
- 5.5.** The RJC shall publish aggregated and anonymised complaints data in its Annual Progress Report, with the exception of whistleblower complaints, as per clause 6.4.10.

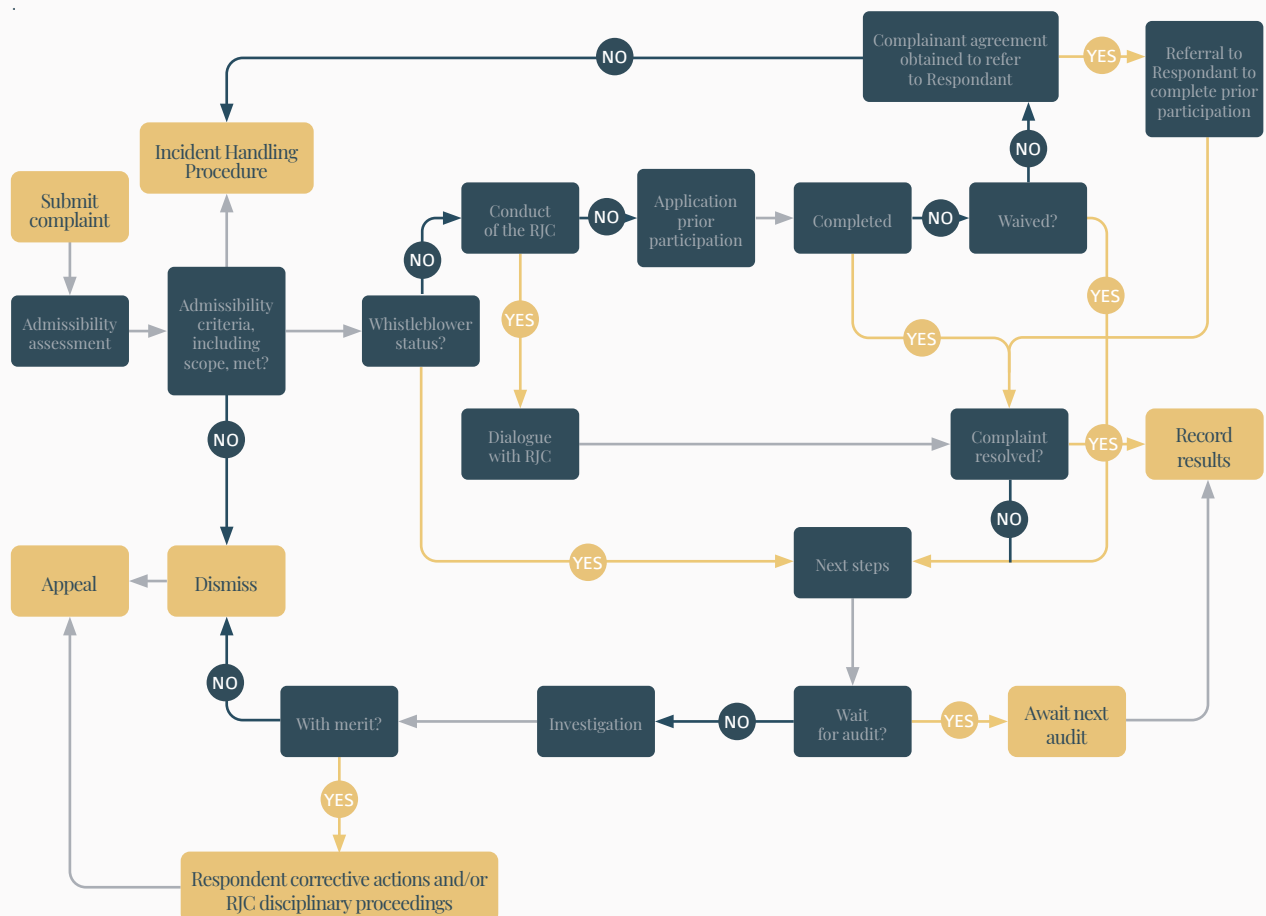


Figure 2: Overview of Complaints Mechanism process

6. PROCESSING COMPLAINTS

6.1 Complaints Register

- 6.1.1 The RJC, via its Compliance Assurance Department, shall record and manage all complaints received (with support from other teams, as applicable), along with supporting documents, resulting actions and final outcome in the RJC Complaints Register.
- 6.1.2 The RJC shall retain these records for a period of 10 years, or longer where specified by applicable UK law, from the date the complaint is concluded. These records will be made available for internal audits and other internal review processes, including updates to the RJC Risk Register, as applicable, with regard to confidentiality and Complainant protection.

6.2 Admissibility assessment

- 6.2.1 The RJC Compliance Assurance Department shall assess all complaints for admissibility as follows:
- 6.2.1.1 Determine whether the complaint fulfils the admissibility criteria (see Table 2, Admissibility criteria and Scope determination).
- 6.2.1.2 Determine whether whistleblowing status applies.
- 6.2.1.3 Determine whether the complaint relates to the conduct of the RJC.
- 6.2.1.4 Determine whether prior-participation requirements apply and have been fulfilled.
- 6.2.2 The RJC Compliance Assurance Department shall categorise all complaints as follows:
- 6.2.2.1 Dismissed: Out of scope or failing admissibility criteria.
- 6.2.2.2 Admissible: To be investigated in accordance with this Mechanism.
- 6.2.3 The RJC Compliance Assurance Department shall formally communicate the admissibility determination (dismissed or admissible) to the Complainant within 15 working days of receipt.
- 6.2.4 The RJC shall admit or dismiss the complaint using the criteria in Table 2:

Table 2: Admissibility criteria

Criteria	Dismissed	Admissible
Origin of complaint	Anonymous, other than whistleblowing, or unverifiable	Identified and verifiable
Reporting time frame	More than one year after the occurrence. However, the RJC reserves the right to review historical complaints, including complaints that exceed the one-year limit due to the completion of prior-participation stages, on a case-by-case basis, as long as the occurrence sits within the RJC membership period.	Within one year of occurrence (where the occurrence sits within the RJC membership period)
Relation to the scope of the Complaints Mechanism (clause 6.2.7)	Out of scope	In scope
Supporting evidence	Not provided or insufficient or unverifiable (see clause 6.2.5)	Provided and sufficient
Current RJC membership or RJC approval status of Respondent	No	Yes
Ongoing or pending judicial proceedings	Yes	No
Trivial, unreasonable or generated for competitive advantage	Yes	No
Feedback and enquiries	Yes	No
Quality issues with a purchased product (consumer complaints)	Yes	No
Private dispute between Complainant and Respondent	Not related to RJC certification or RJC activities	Related to RJC certification or RJC activities

- 6.2.5 The RJC may request additional evidence. If the requested evidence is not provided within 15 working days of the request, or if the evidence provided is deemed insufficient or unverifiable, the RJC shall dismiss the complaint.

Note: If the complaint is dismissed because the 15-working-day timeline could not be met, a new complaint can be instigated once additional information can be collated.

- 6.2.6 Complaints that are dismissed under clauses 6.2.4 or 6.2.23.3, or admissible complaints falling under 6.2.5 may trigger the RJC Incident Handling Procedure, including when the alleged issue might create a reputational risk to the RJC and/or the industry, its standards or its members.

I. Scope determination

- 6.2.7 To be admissible, the complaint shall fall within the scope of the Complaints Mechanism. Admissible complaints shall therefore concern, but not be limited to:
- a) the development and maintenance of RJC standards, and assurance processes and decisions.
 - b) conduct of the RJC with regard to its governance, policies and procedures.
 - c) approval status of an individual auditor.
 - d) RJC membership status of a member organisation.
 - e) conduct of RJC members or entities under their control that brings the RJC into disrepute as per the RJC Articles of Association and the RJC membership agreement.
 - f) escalated complaints against RJC members or entities under their control that have not been satisfactorily resolved through prior-participation channels (see Section 1) and relate to their compliance with the RJC standards and certification requirements.
 - g) conduct of RJC-approved certification bodies or individual auditors, or the RJC's accreditation body/assurance provider, related to or during evaluation/assessment activities, where the matter falls within the scope of the RJC Approval Criteria for Certification Bodies and Auditors (www.responsiblejewellery.com/auditors/become-an-rjc-auditor), or where the complaint has not been satisfactorily resolved through prior-participation channels (see Section 1).

Note: Complaints regarding the audit and certification process shall first be directed to the relevant certification body and processed according to the certification body's own complaints procedure.

II. Whistleblowing status determination

- 6.2.8 The RJC shall determine at the earliest possible stage whether the complaint meets the definition of being granted whistleblowing status (see Section D), as these instances require confidential and differentiated handling.
- 6.2.9 The RJC shall ensure confidentiality and take all necessary and appropriate measures within its control to ensure the protection of the identities of Whistleblowers.
- 6.2.10 When receiving concerns orally, the RJC shall ask whether the Whistleblower prefers that the conversation be treated anonymously.
- 6.2.11 Where anonymity is requested, the RJC shall assign a code number to the Whistleblower or accept a code number provided by the Whistleblower.
- 6.2.12 Notwithstanding the above, and for transparency purposes, this Mechanism does not confer any legal rights or guarantees under any applicable whistleblowing laws.

- 6.2.13 Before submitting a whistleblowing complaint, the Whistleblower should acknowledge the risks and limitations inherent in the RJC's mandate.
- Note:** Whistleblowers are encouraged to seek independent legal advice to understand their rights and protections under applicable legislation.
- 6.2.14 The RJC shall obtain the Whistleblower's formal consent before taking any action related to the complaint.
- 6.2.15 The RJC shall protect the Whistleblower's identity from disclosure without their consent through the following steps:
- 6.2.15.1 All information provided by Whistleblowers shall be handled confidentially.
- 6.2.15.2 All possible steps shall be taken to ensure that information provided does not reveal the person's identity, while acknowledging that complete anonymity may not be guaranteed in all cases.
- 6.2.15.3 The RJC shall inform the Whistleblower before the initiation of the Complaints Mechanism about the process and corresponding risks of retaliation.
- 6.2.15.4 The RJC shall not use or reveal evidence provided by Whistleblowers if there is a risk that doing so will reveal their identity.
- 6.2.15.5 The RJC shall collect its own evidence in the first instance to avoid the evidence provided by the Whistleblower being linked to them.
- 6.2.15.6 When it is not possible for the RJC to collect its own evidence, the RJC shall revert to clause 6.2.14 before taking any further action related to the complaint.
- 6.2.16 The RJC shall inform the Whistleblower of any involvement of law enforcement (where permitted by relevant legislation) and inform the Whistleblower if the RJC is legally required to disclose confidential or anonymous information by law, court ruling or administrative order.
- 6.2.17 The RJC shall remove all information that could reveal or suggest the Whistleblower's identity from the complaint report and records, along with any attachments, and save the removed information and attachments in a password-protected folder with limited access permissions.

III. Complaints about the conduct of the RJC

- 6.2.18 If an admissible complaint concerns the conduct of the RJC, the Compliance Assurance Department of the RJC shall assign it to relevant RJC personnel, who shall act as the Respondent and invite the Complainant to engage in dialogue.
- Note:** This dialogue may occur via video conference, phone call or email, or in person.
- 6.2.19 The RJC personnel who are acting as the Respondent under 6.2.18 shall resolve the complaint within the timelines established in clause 6.2.21.
- 6.2.20 Where the complaint relates to multiple RJC departments, the managers of the departments involved shall collaborate to address the complaint and resolve the root cause.
- 6.2.21 The relevant RJC personnel shall act as follows:
- 6.2.21.1 Engage in dialogue with the Complainant within 10 working days of the determination of admissibility.
- 6.2.21.2 Circulate a draft summary of the dialogue and its conclusions to the Complainant within five working days of the dialogue.
- 6.2.21.3 Allow 10 working days from the date of sending a draft summary of the dialogue and its conclusions to the Complainant for comment and response.
- 6.2.21.4 Within five working days of the Complainant's response, review and respond to all comments received from the Complainant and update the summary where appropriate.

Note: Additional time frames may apply as per Section 8, Time frames. The above engagement may be repeated until a resolution is achieved. In the absence of a resolution after dialogue with the RJC, next steps are established as per Section 6.3, Determining next steps.

- 6.2.21.5 Circulate a final summary of the dialogue to the Complainant and the Compliance Assurance Department (for record-keeping purposes).
- 6.2.21.6 Request confirmation from the Complainant that the matter is considered resolved, within five working days of resolution. In the event of an admissible complaint about the conduct of the RJC with regard to its governance and policies, an independent investigation may be needed into the conduct of the RJC, as determined by the Executive Committee, as opposed to dialogue (see Section 6.4.4).

IV. Complaints about the conduct of RJC members, certification/accreditation bodies, auditors or the assurance provider (prior participation)

- 6.2.22 Whistleblowing cases exempt and subject to clause 1.6, where a complaint is received by the RJC, and prior participation (Section 1) is applicable and has NOT been completed and evidenced by the Complainant, the RJC shall refrain from processing the complaint until prior participation has been completed and evidenced to the RJC.
- 6.2.23 In this case, the RJC shall act as facilitator, initiating prior participation, as outlined below:
 - 6.2.23.1 The RJC shall seek and obtain the Complainant's agreement to refer the complaint to the appropriate Respondent.
 - 6.2.23.2 Upon obtaining agreement, the RJC shall forward non-confidential versions of the complaint to the Respondent.
 - 6.2.23.3 Should the Complainant not provide their agreement in this regard, the RJC shall dismiss the complaint for lack of applicable prior participation and refusal of referral to the Respondent. In this case, clause 6.2.6 may apply.
 - a) Members are expected to address complaints through their complaints and grievance mechanisms, as required by the RJC standards, without the need for active RJC involvement, once referral is completed.
 - b) Certification bodies are expected to address complaints and grievances regarding auditors, evaluation activities and certification through their internal systems, in line with ISO 17065 requirements and RJC Certification Process Requirements for Certification Bodies and Auditors, without the need for active RJC involvement, once referral is completed.
 - c) The assurance provider/accreditation body is expected to address complaints and grievances regarding oversight, approval and accreditation of certification bodies through its internal systems. If necessary, the RJC may provide interpretation of the RJC standards and assurance documents to assist in the resolution of the complaint at this prior-participation level.

Note: Actions may be set and agreed during the referral process and associated prior participation, leading to resolution.

- 6.2.24 Whistleblowing cases exempt and subject to clause 1.6, where a complaint is received by the RJC, and prior participation (Section 1) has been completed and evidenced by the Complainant, the RJC shall review complaints that remain unresolved as per Section 6.3, Determining next steps.

6.3 Determining next steps

- 6.3.1 Where complaints remain unresolved as per clauses 6.2.21.4, 6.2.21.6 and 6.2.24, or prior participation is not applicable or is waived as per clause 1.6, the RJC shall:
 - 6.3.1.1 review the outcome of the prior participation, dialogue and associated evidence, as applicable, and
 - 6.3.1.2 determine next steps as per clause 6.3.2, and

- 6.3.1.3 communicate the next steps and the associated deadlines to the parties to the complaint within 15 working days of determining that the complaint fulfils the admissibility criteria, where such communication does not affect the integrity and fairness of the process (e.g. including but not limited to Whistleblower complaints; see clauses 6.2.14, 6.2.15 and 6.4.5.4.1).

- 6.3.2 The next steps shall specify whether the complaint shall be:

- a. flagged with the RJC member's certification body of choice for the next scheduled audit, or
- b. subject to investigation (Section 6.4, Investigation), or
- c. subject to RJC disciplinary proceedings, including where the agreed remedial or corrective actions resulting from prior-participation resolution of the complaint are not implemented within agreed time frames at the prior-participation stage.

Disciplinary proceedings may be initiated, as established in the RJC's Articles of Association, Member Certification Handbook, RJC Certification Process Requirements for Certification Bodies and Auditors, and Approval Criteria for Certification Bodies and Auditors, available at www.responsiblejewellery.com.

These documents describe the process followed by the RJC for known misconduct by members or approved certification bodies and their individual auditors.

Disciplinary proceedings may be triggered without an active complaint and may result in suspension or loss of RJC membership, or approved certification body or approved auditor status.

- 6.3.3 The RJC shall close the complaint once the next steps and associated actions have been satisfactorily completed.

6.4 Investigation

- 6.4.1 A complaint investigation may be conducted by the relevant RJC personnel and/or external contractors, with the support of independent third-party bodies, if necessary.

- 6.4.2 The RJC shall initiate an investigation in cases of:

- a) known misconduct, or
- b) failure by a Respondent to try to resolve the matter in good faith, or
- c) breach of contract by an approved certification body, or
- d) whistleblowing, or
- e) a need to determine an action plan to resolve the complaint, or
- f) any other matter deemed substantive and applicable.

- 6.4.3 Where complaints require further assessment or investigation by independent third parties, the RJC Executive Director shall appoint a complaints and grievances panel. The panel shall consist of RJC Compliance Assurance Department staff and one or more independent third parties, free from conflict of interest. Additional parties may be appointed if deemed necessary.

Note 1: Where the RJC Executive Director has a conflict of interest (actual or potential) in the matter under investigation, the panel shall be appointed by, and report to, a nominated member of the RJC Executive Committee.

Note 2: The number of personnel involved in the investigation and decision-making process related to whistleblower complaints shall be kept to a minimum in order to maintain confidentiality and protect the identities of those involved.

- 6.4.4 Where an independent third-party investigation into the conduct of the RJC may be required, the Executive Committee shall appoint an independent third-party investigation body to complete the investigation. The independent body may appoint an ad hoc panel that excludes RJC staff or officers where appropriate, to conduct the investigation impartially and make unbiased recommendations.

- 6.4.5 The complaints and grievances panel or the independent third-party investigation body shall act as follows:
- 6.4.5.1 Set Terms of Reference for the investigation and submit them to the Executive Director and/or Executive Committee for approval.
 - 6.4.5.2 Complete the investigation within 70 working days in line with the Terms of Reference. If additional time is necessary to complete the investigation, the Terms of Reference shall include a justification in this regard, based on the complexity of the case, information availability, elements outside of the RJC's control, etc.
 - 6.4.5.3 Contact and consult with the parties using culturally appropriate methods to understand perspectives and potential solutions.
 - 6.4.5.4 Use all available information that can be gathered remotely and, if required, facilitate and/or conduct investigative follow-up on-site visits/audits to collect further information.
 - 6.4.5.4.1 For RJC members, an investigative follow-up audit may take place sooner than the next scheduled audit and may be:
 - a) semi-announced as per the Certification Process Requirements for Certification Bodies and Auditors, or
 - b) unannounced. In this case, the panel shall inform the relevant certification body and the accreditation body/assurance provider of this and coordinate to schedule the audit. The panel may notify the member up to 48 hours before the audit to secure auditor access and obtain member acknowledgement by phone.
 - 6.4.5.4.2 The RJC reserves the right to invoice the member for costs associated with an investigative follow-up audit if the complaint is upheld.
 - 6.4.5.5 Produce a draft investigation report including a summary of findings, a decision on the outcome of the complaint (including whether the complaint is upheld (in whole or in part) or dismissed) and necessary corrective actions and recommendations. The RJC shall share the draft investigation report or a summary of findings, outcomes and actions, as applicable, with the Respondent, the Complainant, and the RJC executive team. All recipients shall provide comments within 10 working days.
 - 6.4.5.5.1 Where the complaint is upheld, one of the following actions may be recommended:
 - a) corrective action plans and associated time frames.
 - b) audit follow-up on corrective actions.
 - c) suspension or withdrawal of certification.
 - d) temporary or permanent loss of RJC membership.
 - e) suspension or withdrawal of approval.
 - 6.4.5.6 Review and respond to the feedback from the parties and finalise the report for the RJC.
 - 6.4.6 The RJC shall share the final investigation report or a summary of findings and actions, as applicable, with the Respondent and the Complainant, as well as the RJC executive team, along with responses to their comments.
 - 6.4.7 The RJC Compliance Assurance Department shall monitor all agreed remedial or corrective actions for completion by the Respondent, which may be verified by an independent third party, if necessary, and escalate them within the RJC where necessary.
 - 6.4.8 Failure to implement corrective actions shall trigger the RJC's disciplinary proceedings as per clause 6.4.2.c.
 - 6.4.9 The RJC shall invite the parties to provide feedback on the complaints process.

Note: This feedback opportunity is intended to improve the process, not to relitigate the complaint outcome.
 - 6.4.10 Whistleblowing cases are exempt from the above reporting requirements and associated timelines to Respondent that arise from procedural steps, as well as public reporting in the RJC Annual Progress Report.

7. APPEALS AGAINST RJC COMPLAINT DECISIONS

- 7.1** Should Complainants wish to appeal against any decisions taken at the prior-participation stage, the appeal shall be submitted to the Respondent making that decision, to be handled as per the Respondent's documented procedures for appeals.
- 7.2.** If the appeal is considered unsatisfactory or no action has been taken on the appeal within the established time frame as per the previous Respondent's documented procedures for appeal handling, the matter can be referred to the RJC as an escalation point.
- 7.3.** Complainants may appeal an RJC decision or outcome following a complaint within three months of notification of the relevant decision, if:
- a) due process in the RJC complaint handling was not followed, or
 - b) significant evidence was not properly considered.
- 7.4.** The RJC shall hear the appeals via reconsideration of the complaint in a new assessment and/or investigation process conducted by different RJC personnel, or a newly appointed complaints and grievances panel, consisting of new members, as applicable.
- 7.5.** For appeals against suspension or termination of RJC membership, Section 3.18 in the RJC's Articles of Association makes provision for appeals to be heard under the rules of arbitration of the Chartered Institute of Arbitrators (UK), by an arbitrator appointed by its president.
- 7.6.** All appeal outcomes are considered final and may not be appealed further.

8. TIME FRAMES

- 8.1.** The Mechanism shall adhere to the time frames in Table 3:

Table 3: Time frames

Step	Time frame
Acknowledgement of complaint receipt to the Complainant	Within 5 working days of receipt
Admissibility assessment completion	Within 15 working days of receipt
Reassessment of admissibility (if additional information is provided)	Within 10 working days of date of receipt of additional information
Determining next steps	Within 15 working days of determining that the complaint is admissible (including reassessment of admissibility)
Complainant response to any request from the RJC (including requests for additional information), from an independent third-party, or complaints and grievances panel	Within 15 working days of such a request (see clause 6.2.5)
Investigation	70 working days, with the possibility of allowing more time (see clause 6.4.5.2)

9. CONFIDENTIALITY AND ANTI-TRUST POLICIES

- 9.1. The RJC shall keep the existence of specific complaints and all proceedings of the Complaints Mechanism process confidential.
- 9.2. The RJC reserves its right to publicly report, anonymously and in aggregate, on the complaints received and how they were resolved.
- 9.3. The RJC is committed to complying with all relevant anti-trust and competition laws and regulations. To that end, the RJC has adopted an Anti-trust Policy and Rules and a Confidentiality Policy (for both, see www.responsiblejewellery.com/about/policies).



THE COUNCIL FOR RESPONSIBLE JEWELLERY PRACTICES LTD.

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