# Tool 1C.1: Information checklist: types of information to gather and record (all sources)

|  |  |  |
| --- | --- | --- |
| Example document/evidence type  Information on 1, and 2 are required for all, information on 3 and 4 is only required if you are sourcing mined material, 5 and 6 for recycled and grandfathered material and 7 for all midstream/ downstream companies. |  | Who needs to collect |
| 1. Supplier details, including KYC due diligence information (Also see COP 10)   To be collected at the start of each new business relationship with a supplier and updated regularly. The accuracy of the information should be checked at least annually for suppliers based in low-risk jurisdictions, and at least every 6 months for suppliers based in high-risk jurisdictions.  Document examples:   * Business structure and registration documents. * Completed KYC questionnaires * Records of checks against relevant government lists for individuals or organisations implicated in money laundering, fraud or involvement with prohibited organisations and/or those financing conflict. * Copies of official government issued identification (e.g. personal identification documents for individuals and business licences, registration of tax ID number for companies). |  | All companies  Mining companies to provide information |
| 1. Information on the form, type, weight and physical description of diamonds/coloured gemstones   To be collected so that it covers all supplies from a given supplier over a given time period, for example via a contract or per parcel  Document examples:   * Invoices and sales documentation. * Other inventory documentation. * Gemmological laboratory reports and/or certificates (polished stones only). |  | All companies  Mining companies to provide information |
| 1. Source of extracted rough diamonds/coloured gemstones   To be shared/collected on a risk-based frequency. For example, much of this can be collected only once if buying from an established supplier and only updated when there are changes to the circumstances of the supplier, or something is flagged as part of your risk assessment, or as per your normal review procedure.  Miners to share with buyers  Document examples:   * Mining licences * Transport documentation (per parcel/consignment) (Optional if purchasing from ASM) * Evidence of participation in relevant responsible sourcing initiatives (Optional if purchasing from ASM)   Other upstream actors to gather and share with buyers  Document examples:   * Some/all of the above from miners * Official country of origin certificate/KPCS certificate (available to importers) * Exporter records (per parcel/consignment) * Contract and/or invoices showing mine and/or company name of furthest upstream supplier (per parcel/consignment)   *Note: You should be looking to identify the furthest upstream source of diamonds/coloured gemstones in your supply chain (i.e. the mine of origin and producing company if possible, otherwise the furthest upstream entity). Upstream actors that sell rough diamonds/coloured gemstones from mixed sources should provide as much information as possible to buyers (e.g. a list of the mines, companies, areas/countries of origin, supported by some of the documentation shown above where available).*  *Where information on the source of diamonds/coloured gemstones is limited or unavailable, you should adopt the ‘comply or explain’ approach where you explain and document the steps you’ve taken to seek information and your plans to improve your data over time.*  *Conflict-affected and high-risk areas (CAHRAs) are identified by the presence of armed conflict, widespread violence, including violence generated by criminal networks, or other risks of serious and widespread harm to people. Armed conflict may take a variety of forms, such as conflict of international or non-international character, which may involve two or more states, or may consist of wars of liberation or insurgencies, civil wars, etc. High-risk areas may include areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure and widespread violence. Such areas are often characterised by widespread human rights abuses and violations of national or international law. A CAHRA can be a region, a country, an area within a country or an area that crosses one or more national boundaries. Operations are not necessarily complicit in conflict if they are located in a CAHRA.* |  | Upstream companies |
| 1. Source of mined rough and polished diamonds/coloured gemstones   To be shared/collected so that information on supplies is always up to date. Information provided by established suppliers should be updated at least annually for diamonds/gemstones that originate from low-risk areas, and at least every 6 months where diamonds/coloured gemstones originate from high-risk areas.  Document examples:   * List of countries, areas, producing companies where diamonds/coloured gemstones originate.   *Note: You should be looking to identify the furthest upstream source of diamonds/coloured gemstones in your supply chain (i.e.the mine of origin and producing company if possible ,otherwise the furthest upstream entity such as a rough stone trader). Ask your suppliers to provide you with a list of sources, and where applicable, request copies of relevant documentation and evidence to verify this (as shown above).*  *Where information on the source of diamonds/coloured gemstones is limited or unavailable, adopt the ‘comply or explain’ approach (see above).*  *Conflict-affected and high-risk areas (CAHRAs) are identified by the presence of armed conflict, widespread violence, including violence generated by criminal networks, or other risks of serious and widespread harm to people. Armed conflict may take a variety of forms, such as conflict of international or non-international character, which may involve two or more states, or may consist of wars of liberation or insurgencies, civil wars, etc. High-risk areas may include areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure and widespread violence. Such areas are often characterised by widespread human rights abuses and violations of national or international law. A CAHRA can be a region, a country, an area within a country or an area that crosses one or more national boundaries. Operations are not necessarily complicit in conflict if they are located in a CAHRA.* |  | Midstream and downstream companies |
| 1. Recycled polished diamonds/coloured gemstones   To be collected so that it covers all supplies from a given supplier over a given time period  Document examples:   * Invoices and sales documentation identifying the point at which the diamond/coloured gemstones are returned into the jewellery supply chain (e.g. invoice showing that stones were bought from privately owned jewellery)   *Note:* *Recycled diamonds/coloured gemstones are stones that had a prior use and have since re-entered the jewellery supply chain. A jewellery company may purchase second-hand jewellery from the public and resell the item directly, or, break up the item and sell the stones individually, maybe re-cutting and polishing them prior to sale. In such cases it is not necessary to identify the extraction source, but you should obtain adequate documentation and evidence that the stones are recycled and not ‘freshly mined’ stones falsely represented as recycled ones.* |  | Midstream and downstream companies |
| 1. Grandfathered rough and polished diamonds/coloured gemstones   To be collected so that it covers all supplies from a given supplier over a given time period  Document examples:   * Invoices and sales documentation to verify that existing stocks of diamonds/coloured gemstones were purchased before the effective date of the 2019 COP.   *Note: Information on the original source is not required on stones purchased prior to the effective date of the 2019 COP, unless there is reasonable evidence to suspect they were extracted after this date.* |  | All companies |
| 1. Evidence of due diligence carried out by upstream suppliers   To be collected only as often as needed to ensure that your information remains applicable and current. Update whenever your suppliers changes their sourcing and request a routine update at least once a year.  Document examples on the supplier (not all required):   * Supplier supply chain policy. * Risk assessment documentation. * Evidence of audits carried out in conformance with the OECD Guidance, covering the sourcing practices of red-flag suppliers. * Evidence of supplier participation in relevant industry programmes and initiatives e.g. the Maendeleo Diamonds Standards certification process, Mano River Union Cross-Border Initiative, RJC certification. |  | Midstream and downstream companies |