



RESPONSIBLE  
JEWELLERY  
COUNCIL

# CODE OF PRACTICES STANDARD – PROVISION 14 SUPPLEMENTARY GUIDANCE

RELATING TO  
DIAMOND TRACEABILITY CLAIMS

V1 NOVEMBER 2025

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## 1. INTRODUCTION

This supplementary guidance explains how RJC members wishing to make claims affirming that they have effective traceability or segregation systems underpinning these origin claims, must have these verified for these to be included in their RJC Code of Practices (COP) audit and certification, by setting out the minimum controls that need to be included in members' systems in order to support a specific claim of diamond traceability. The requirements in this supplementary guidance may also be used to further inform the management systems that Members choose to implement, to provide evidence of the robustness of other Provenance Claims regarding the origin of diamonds.

This is in recognition to increasing requests being faced by suppliers of diamonds and diamond jewellery to provide positive assurance of the origin of their diamonds or to support of a negative claim that the diamonds do not originate from certain territories (e.g. that diamonds, whether loose or included in jewellery, are (not) sourced/(do not) originate from country X or that they originate from specific mines or companies, as well as to provide assurance that they have effective systems to trace their origin and manage segregation.

The RJC already allows members to have a provenance claim indicating the country(ies) where diamonds are (not) sourced / (do not) originate from under COP 14 Provenance Claims. These provenance claims are voluntary, but if members wish to use them, such provenance claims are then part of their audit and certification.

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## 2. DEFINITIONS

**Provenance claims** – claims about the way the RJC members source their materials or what kind of material members can provide to their customers, covering the sources, origins or practices used when sourcing. Any provenance claim must include both a promise and a system. For example, provenance claims relating to diamonds may be made when a company:

- traces material back through the supply chain to its origin, e.g. through dedicated IT systems, blockchain or invoices from the mine of origin, and/or assures the custody of the material while under their control.
- verifies the sources or practices related to the material, e.g. working with suppliers to source material from specific projects or to support certain stakeholder groups.
- sources material from certified suppliers, e.g. CanadaMark; or
- scrutinises materials or sourcing, e.g. going beyond the COP 7 requirements by conducting due diligence on sustainability impacts related to the mine of origin.

All provenance claims must be related to the member's own sourcing practices.

**Diamond traceability** – a system that enables the tracking and tracing of diamonds through the supply chain from a specific point in the value chain and back to a specific point of origin.

This can be to:

- a country or mine of origin.
  - a named mid-stream (Tier 1 or 2) company.
  - a named Upstream company.
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### 3. PURPOSE

The RJC recognises that many members are being asked to demonstrate that they have effective systems to trace the origin of diamonds being supplied by them and may also be undergoing independent audits of their traceability systems. This can lead to duplicative audits and increases the burden on members both in terms of time and costs.

Members in such a supplier relationship or facing consumers may, therefore, wish to provide an assurance to customers by making a traceability claim not only on their sourcing practices or origins of the diamonds for onward use but also on the traceability systems they have implemented to support this claim. This would then be audited as a provenance claim under COP 14 Claims and included as part of their certification. However, for such provenance claims to be meaningful, it is important that the traceability systems underpinning them are robust and consistent.

The core requirements for the acceptable wording for a Provenance Claim to be certified and for other Claims to be verified are set out in the Standards guidance for COP 14. This supplementary guidance sets out the minimum controls that need to be included in members' systems in order to support a specific claim of diamond traceability. This builds on the member's responsible sourcing practices, which are certified based on the evaluation of their systems to support COP 6 (Human Rights Due Diligence), COP 7 (Supply Chain Due Diligence) and COP 12 (Know Your Counterparty) which would be audited in the usual way.

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### 4. REQUIREMENTS

The system to support a claim of diamond traceability must include the following:

- **A documented management system**, including:
    - Appointment of a sufficiently senior and experienced manager responsible for the overall management of the process.
    - Definition of the organisational structure, responsibilities, and authorities of workers with respect to the chain of custody.
    - Procedures and processes covering each step within the members' control from receipt to shipment to a customer.
    - Procedures to control any outsourced activities, whether through outsourced contractors or owned and affiliated entities, including training such entities to understand their role in the pipeline.
    - Procedures to investigate any non-conformances and anomalies and to develop corrective actions and mitigation strategies to ensure ongoing conformance.
    - Recorded and effective training of relevant employees and workers at appropriate intervals.
    - Internal audits and reconciliation of output undertaken by suitably qualified individuals.
    - Data integrity, management and record keeping, with records maintained for a minimum of 5 years or legal requirements, whichever is longer.
  - **A documented risk assessment** to identify:
    - the chain of accountability from the defined origin to receipt by the member and the chain of custody within the Member's value chain until the point when they are issued to a customer and the substantiated provenance claim is provided.
    - any risks inherent in the supply chain that may introduce diamonds from illegal, sanctioned or unidentified sources into the pipeline.
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- any points where contamination or swapping/switching may occur during the member's activities, whether within the member's owned premises or through outsourced activities and adopt mitigation strategies to address these risks.
- any risks of potential inadvertent or intentional mixing of diamonds from different sources and adopt mitigation strategies to address these risks.
- An evidence trail that can identify the point of origin of all diamonds either individually or at batch level  
This could include:
  - Kimberley Process certificates with origin information (mixed only, without the specific countries within the mixed origin, would not suffice).
  - Invoice statements and declarations, subject to appropriate due diligence.
  - Audits along the supply chain to verify written assurances.
- An evidence trail that maintains the origin of all applicable diamonds within the chain of custody while diamonds are under the control of the member and any outsourced processes. This includes:
  - Entities within the member's business.
  - Sub-contractors providing services, such as, but not limited to, scanning, lasering, cutting, polishing.
  - Service providers, such as, but not limited to laboratories and couriers.

**A traceability and/or segregation system**, embedded within the overall management system for each entity in the chain of custody of the Member's organisation or its contractors, embedded within the overall management system for each entity in the chain of custody of the Member's organisation or its contractors, recognising any risks identified in the initial assessment and that can identify the diamonds at every stage and their link to the claimed origin(s) through to the finished product shipment.

The segregation system must ensure that diamonds not within the scope of the provenance claim, but which may still be in the custody of the Member, are kept segregated, and that controls are documented, implemented and assessed regularly for contamination or weakness risks.

- **Security systems including**
  - IT Systems and controls to ensure security of access to data and control any changes to data.
  - A process to manage physical product security, investigate any incidents and implement corrective actions/mitigation strategies.
  - Use of tamper-evident or other similar security protocols for all goods in transit.
- **A reconciliation system** to reconcile all diamonds covered by the traceability system as they move through the pipeline at all stages within the member's premises and when the diamond(s) are being transported from one department/location/entity to another or moving between the entity and any outsourced contractors.
- **A publicly accessible complaints and grievance mechanism** allowing interested parties to voice concerns or queries.

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## 5. VERIFICATION

The auditor conducting the RJC audit (mandatory or special audits) will verify that the member's traceability system underpinning the claim meets the requirements set out in this Supplementary Guidance. The auditor may review any reports of traceability audits to meet specific customer protocols but will have to verify that the scope of these audits covers all entities in the member's scope, including their control of any outsourced activities, and the full range of products for which the claim is being made. Depending on the result of this review, additional verification activities may be required.

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## 6. CLAIMS

The wording of any claim relating to diamond traceability must meet the requirements of COP 14 and the associated guidance document. In addition, members must refer to any additional requirements in the RJC Claims Guide.

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## 7. ADDITIONAL RESOURCES

In accordance with the RJC COP, members must remain aware of legal requirements in relation to claims they make in all territories in which they operate. In addition, a number of brands and organisations have developed protocols covering traceability. These protocols may be used by members to assist them in setting their policies and procedures to support a diamond traceability provenance claim. Examples include, but not limited to:

- RJC COP Guidance Document
- Provenance Claim Supplementary Guidance to the RJC COP Special Provision for G7 Import Restrictions
- De Beers Group Guidance Provenance Claim “Diamonds from DTC”
- The Diamond Traceability Checklist used by UFBJOP, Federorafi and other members
- The De Beers Diamond Pipeline Integrity Specification
- The Signet Responsible Sourcing Protocol SRSP Natural Diamond Appendix
- CIBJO’s The Blue List (The Responsible Jewellery Supply Chain Lexicon)

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## 8. DISCLAIMER

There is no formal recognition process between an RJC certified provenance claim for diamond traceability under COP 14 and any other protocols and requirements. RJC members using this supplementary guidance will still need to comply with any customer requirement, including requests to undergo specific audits against their customers’ requirements. You are therefore advised to seek specific advice as the RJC takes no responsibility.

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The Responsible Jewellery Council is the trading name of the Council for Responsible Jewellery Practices Ltd.

Registered in England and Wales with company number 05449042.

V1. November 2025

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