



# COP 6 & COP 7 Ask Me Anything

2023

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RESPONSIBLE  
JEWELLERY  
COUNCIL

# Agenda

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Code of Practices

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Q&A

01

## Code of Practices

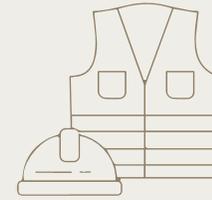
# Code of Practices (COP) Standard



GENERAL  
REQUIREMENTS



RESPONSIBLE SUPPLY  
CHAINS, HUMAN  
RIGHTS & DUE  
DILIGENCE



LABOUR RIGHTS  
& WORKING  
CONDITIONS



HEALTH, SAFETY &  
ENVIRONMENT

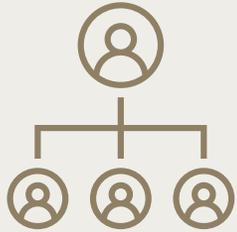


GOLD, SILVER, PGM,  
DIAMOND & COLOURED  
GEMSTONE PRODUCTS



RESPONSIBLE MINING

# Management Systems



MANAGER



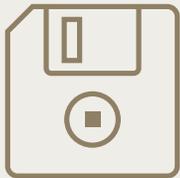
POLICY



RISK ASSESSMENT



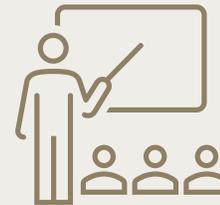
SET PROCEDURES



RECORDS



REPORT



TRAINING



GRIEVANCE  
MECHANISM

UN GUIDING PRINCIPLES

6.1a: Commitment to respecting Human Rights

6.1b: Focus on your operations and supply chains

6.1c: Remedy as per your involvement (cause, contribution, link too)

6.1d: Report to internal & external stakeholders

POLICY

A written policy on your own operations and your supply chain that outlines your commitment, and is

DUE DILIGENCE

An effective due diligence process that is overseen & coordinated through effective management systems. Including a review to identify & assess human rights impacts, a strategy and action plan to respond to identified impacts, and ongoing monitoring and evaluation of efforts.

GRIEVANCE MECHANISM

Appropriate remedy for any identified actual impact and action to stop it happening again.

REPORTING

Reporting on your efforts to prevent and address human rights impacts at least once a year.

S1: Commitment to responsible supply chains

S2 & S4: Focus on your supply chains

S3: Focus on your supply chains

S5: Information needed varies with business type

OECD GUIDANCE

02

COP 6 Human Rights

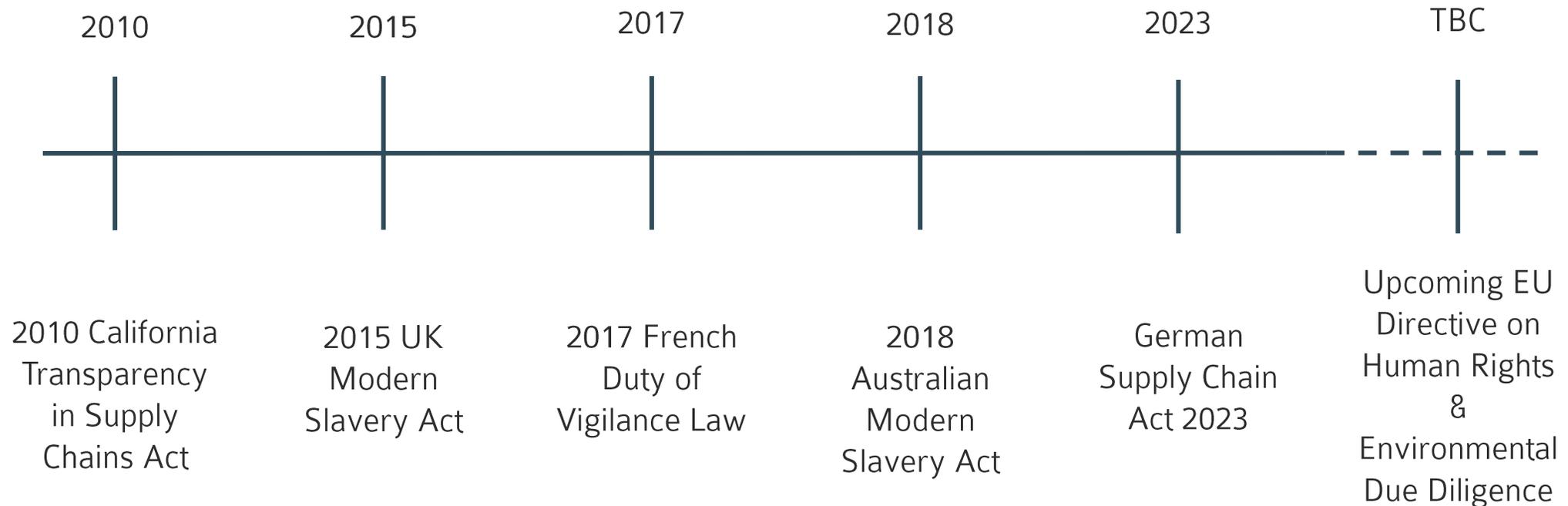
# What are human rights?

- Human Rights are the universal rights and freedoms that belong to all people without discrimination.
- Since 2011, the UN Guiding Principles on Business and Human Rights have become the primary reference for the private sector's responsibility to respect human rights.
- Risks of Human Rights abuses or impacts can be found in any country, sector and workplace.



# Why are Human Rights important to my business?

Here are some examples of regulations that cover Human Rights:



# 03

How do I implement COP 6?

# COP 6 Human Rights

**6.1** Members shall respect human rights by considering all potential and actual impacts in their operations and business relationships. They shall also commit to and implement, the UN Guiding Principles on Business and Human Rights as appropriate to their size and circumstances.

As a minimum, members shall:

- a. Have a policy commitment, endorsed at the highest level of their organisation, to respect human rights within their operations and business relationships, and procedures for implementing the policy in alignment with COP 2 (Policy and implementation).
- b. Have a human rights due diligence process to identify, prevent, mitigate and account for adverse human rights impacts that are connected to their business.
- c. Provide for, or support legitimate processes to enable, the remedy of any adverse human rights impacts that they have caused, contributed to or been linked with.
- d. Communicate annually with stakeholders about their human rights due diligence efforts and remedy activities in accordance with COP 3 (Reporting).

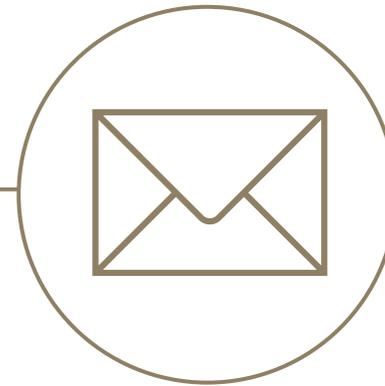
# How do I implement COP 6?



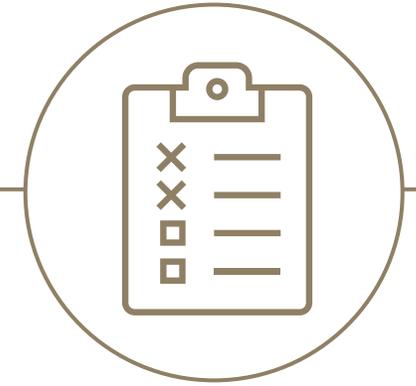
**6.1 A  
POLICY**



**6.1 B  
DUE DILIGENCE**



**6.1 C  
GRIEVANCE  
MECHANISM**



**6.1 D  
REPORTING**

## Step 1: Have a policy commitment (COP 6.1a)

- Signed by a senior leader within your business.
- Clear on your expectations of employees, business units, suppliers and subcontractors.
- Publicly commit to respect human rights in line with the requirements of the COP Standard.
- Written down and include an effective date and have a process for updating.
- It needs to be publicly available and proactively communicated to relevant stakeholders.
- Ensure you reference the human rights policy in supplier codes of conduct, contracts or agreements.
- Check that all your business partners understand what the policy means for them.



## CAUSE

A company is a necessary and sufficient actor for the harm to occur.

- Failing to pay wages to employees.
- Discriminating in treatment of workers.
- Exposing factory workers to hazardous working conditions without adequate safety equipment.
- Dumping chemical effluents from production processes into waterways, directly polluting local communities' drinking water.

## CONTRIBUTION

A company exacerbates the harm, but is not a sufficient actor for it to occur.

- Changing production requirements for suppliers at the last minute without adjusting production deadlines and prices, thereby pushing suppliers to breach labour standards to deliver.
- Working with a subcontractor that is using non-voluntary prison labour to work in factories.
- Relying on on-site labour agents using deceptive tactics to recruit migrant workers, who are then forced into debt to pay recruitment-related fees.

## LINKAGE

A company is linked to harm, but the harm would have been just as severe without it.

- Migrant labour abuse at a supplier's manufacturing site, despite explicit policies against such activities and confirmation from suppliers that such policies are implemented.
- A supplier subcontracting parts of production to child workers in homes, in contradiction to contractual obligations and without any specific procurement pressures from the company.
- Suppliers using raw stones sourced through an agent originating from mines that allow child workers to perform hazardous work endangering their health.

## Step 2: Have a human rights due diligence process (COP 6.1b)

Your human rights due diligence will need to be able to address all three ways that your company can be involved with adverse human rights impacts.

1. Assessing actual and potential human rights impacts.
2. Integrating and acting upon the findings.
3. Tracking responses.
4. Communicating how impacts are addressed.



# Where are the risks to my business?

Some risks include

## INTERNAL RISKS

COP 23 Health & Safety

COP 25 Hazardous Waste

COP 15 General Employment Terms

COP 16 Working Hours

COP 21 Freedom of Association

## EXTERNAL RISKS

COP 7 Conflict-Affected and High-Risk Areas and transportation routes

COP 8 Sourcing from ASM

COP 26 Waste & Emissions

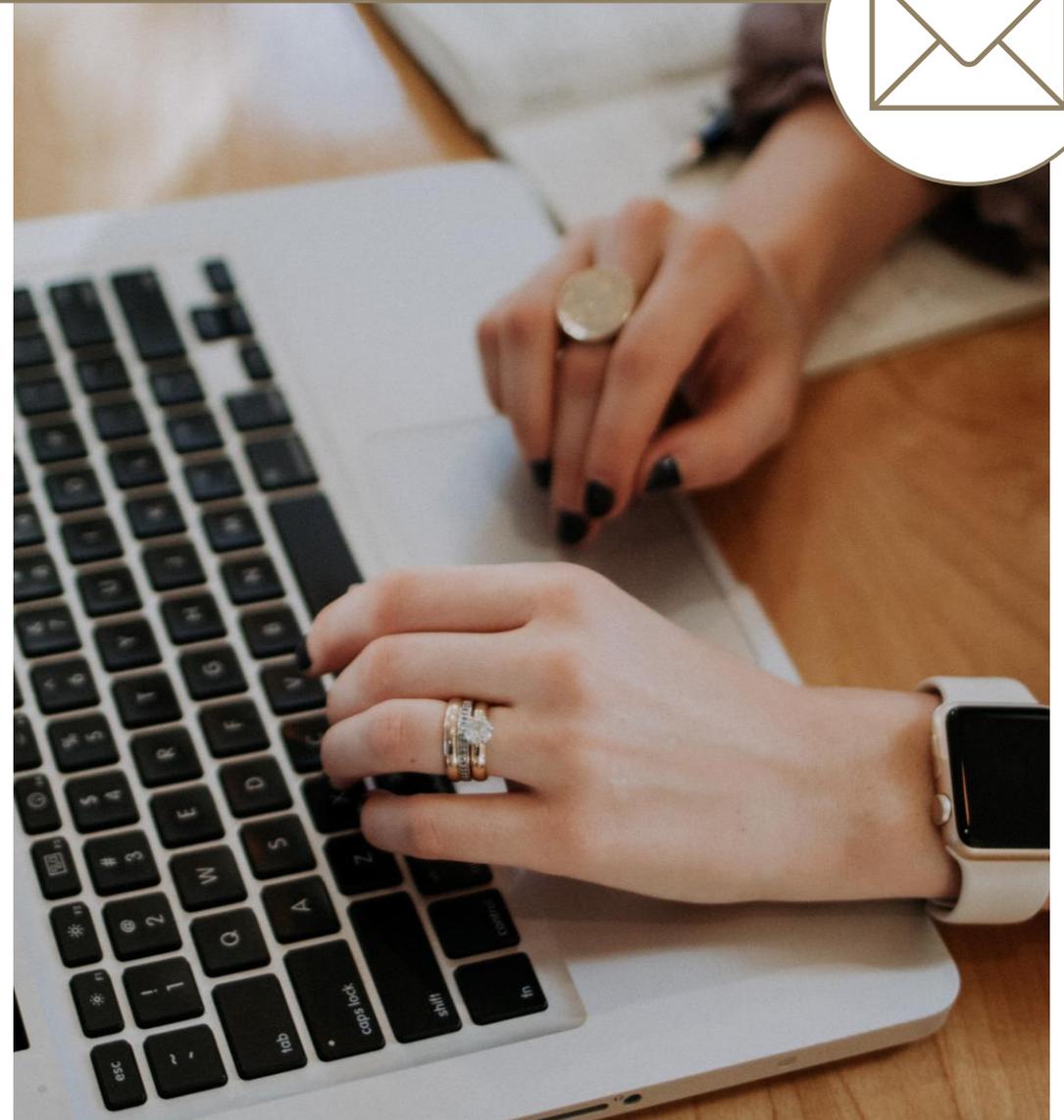
COP 33 Informed Peoples & Free Prior Informed Consent

COP 36 Resettlement

## Step 3: Provide for or support remedy (COP 6.1c)

Develop a grievance mechanism, a channel through which people are able to communicate the fact that they feel negatively affected by your business and can seek remedy.

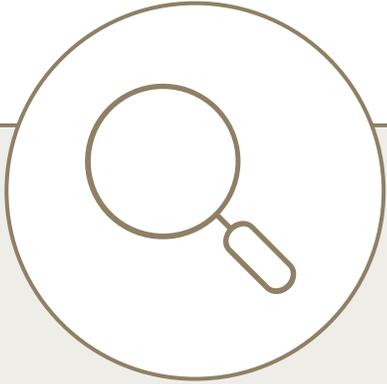
- How someone can raise a grievance giving the email address, link, phone number.
- How you will investigate grievances.
- How you will communicate the outcomes after an investigation.
- How you will document outcomes.
- How you will ensure the confidentiality of the person raising the grievance if appropriate.
- How you will protect those who raise grievances from retaliation.



# Acting upon your grievance mechanism

RECEIVE	ASSESS	ACKNOWLEDGE	INVESTIGATE	RESPOND	RESOLVE OR APPEAL	FOLLOW UP & CLOSE
The responsible person in the company receives and documents a complaint.	They establish the severity of the complaint and the relevant process for this type of complaint is followed.	They confirm receipt of a complaint and outlines processing timeline. If a complaint is not accepted, it is explicitly reported back to the complainant where possible.	The responsible person determines who needs to be consulted. Through stakeholder engagement, the facts leading to the complaint are clarified, the responsible party is identified, and what remedy is desirable is decided.	Through stakeholder engagement, a remediation proposal is prepared. The proposal should be specific and time-bound.	The remediation plan is agreed upon by all parties and is implemented to provide resolution. OR APPEAL The remediation plan is appealed by the complainant who will provide explanation to an independent moderator.	Implementation of the resolution is monitored and followed upon if issues arise. All parties are asked for feedback on the level of satisfaction with the grievance handling process and the outcome, before the grievance is closed.

# Step 4: Communicate (COP 6.1d)



## STEP 1: PREPARE

A summary of the actions you have taken

6.1a Policy

6.1b Due Diligence

6.1c Grievance Mechanism



## STEP 2: DRAFT

RJC Reporting Templates are available

Combine with report for COP 3, 7 & 27



## STEP 3: PUBLISH

Sustainability report

Write a letter or email

Publish on your website

Face-to-face engagement

Employees and external stakeholders

# 04

## COP 7 Due Diligence for Responsible Sourcing from Conflict- affected & High-risk Areas

# What is due diligence?

- Under COP 7, due diligence refers specifically to the reasonable identification and assessment of risks related to sourcing from conflict-affected and high-risk areas (CAHRAs).
- These risks are outlined in Annex II of the Organisation for Economic Co-operation and Development's (OECD's) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the 'OECD Guidance').



# Annex II Risks

As defined by OECD

Serious abuses associated with the extraction, transport or trade of minerals.

Any forms of torture, cruel, inhuman and degrading treatment.

Any forms of forced or compulsory labour.

The worst forms of child labour.

Other gross human rights violations and abuses such as widespread sexual violence.

War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

Direct or indirect support to non-state armed groups (covered by the KPCS for diamonds).

Direct or indirect support to public or private security forces.

Bribery and fraudulent misrepresentation of the origin of minerals.

Money laundering and non-payment of taxes and royalties due to governments.

05

How do I implement COP 7?

# COP 7 Due Diligence

**7.1** Members in the gold, silver, PGM, diamonds and coloured gemstones supply chain shall exercise due diligence over their supply chains in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the 'OECD Guidance') or other auditable due diligence frameworks recognised by the RJC to be aligned with the OECD Guidance ('RJC-recognised due diligence frameworks'), in ways appropriate to their size and circumstances. In addition:

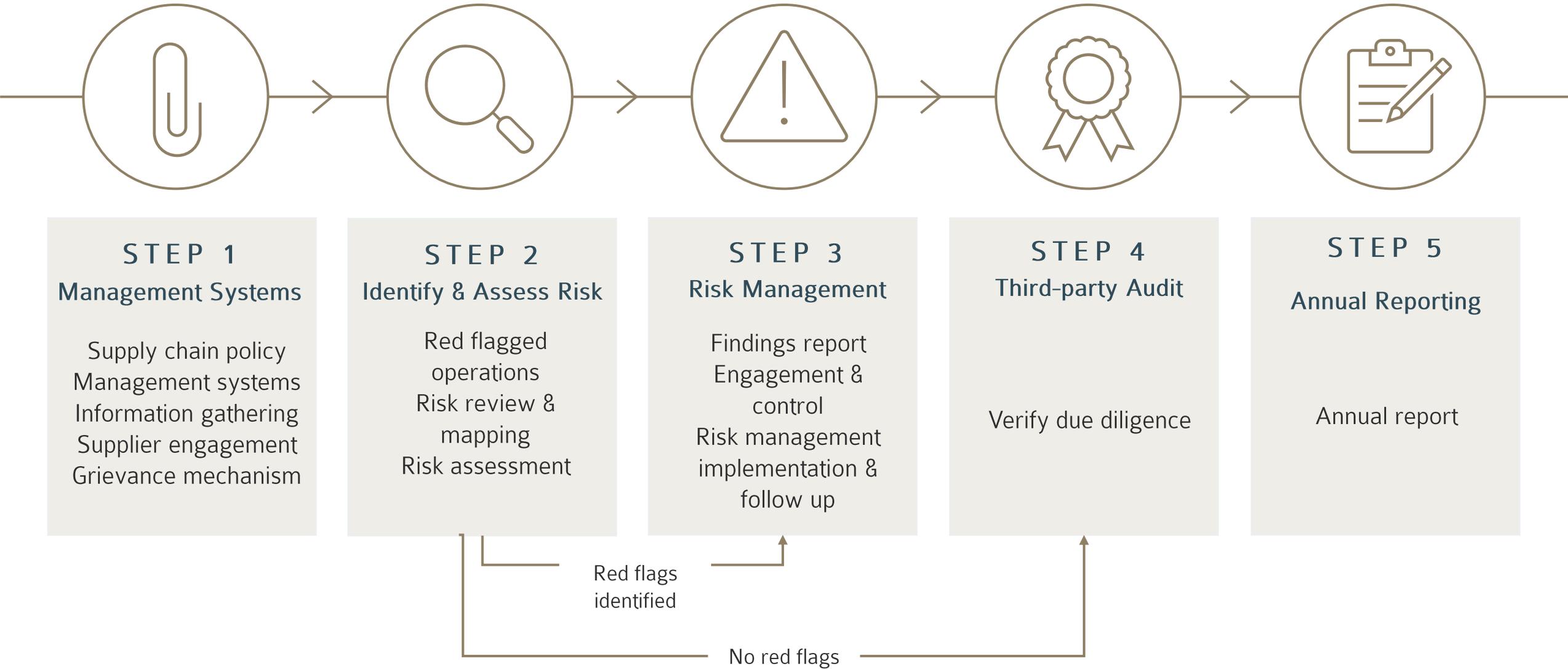
- a. Members in the gold value chain shall implement the OECD Guidance Supplement on Gold as applicable to their operations and supply chains.
- b. Members in the diamond supply chain shall implement the OECD Guidance while complying with COP 29 (Kimberley Process Certification Scheme and World Diamond Council System of Warranties).

**7.2** Members shall adopt and communicate publicly and to their suppliers a supply chain policy with respect to sourcing from conflict-affected and high-risk areas. The policy shall be consistent at a minimum with Annex II of the OECD Guidance or with other RJC-recognised due diligence frameworks.

**7.3** Refiner members shall:

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

# How do you conduct due diligence?



# Step 1: Establish strong company management systems

## 1 A

### Supply Chain Policy

COP standard

Risks from OECD Annex II

Commitment to 5 due diligence steps

Documented, date effective & review date, process for updating

Publicly available

Endorsed it at the highest level of your organisation

Relevant employees are trained

## 1 B

### Management Systems

Assigning a suitably qualified senior staff member to lead your due diligence system

Make the necessary resources available to support due diligence

Set up internal communications processes

Establish a training programme

## 1 C

### Information Gathering

Gathering information from your suppliers on their own supply chain and source of materials

Finding out in commercially sensitive terms which country the diamonds and/or coloured gemstones you buy were mined in, and which company refined the precious metals you buy

## 1 D

### Supplier Engagement

Keep records of your engagement with suppliers as this will help you to keep track of any actions or follow up that may be required

Auditors will also seek evidence that you are actively communicating your due diligence expectations to suppliers

## 1 E

### Grievance Mechanism

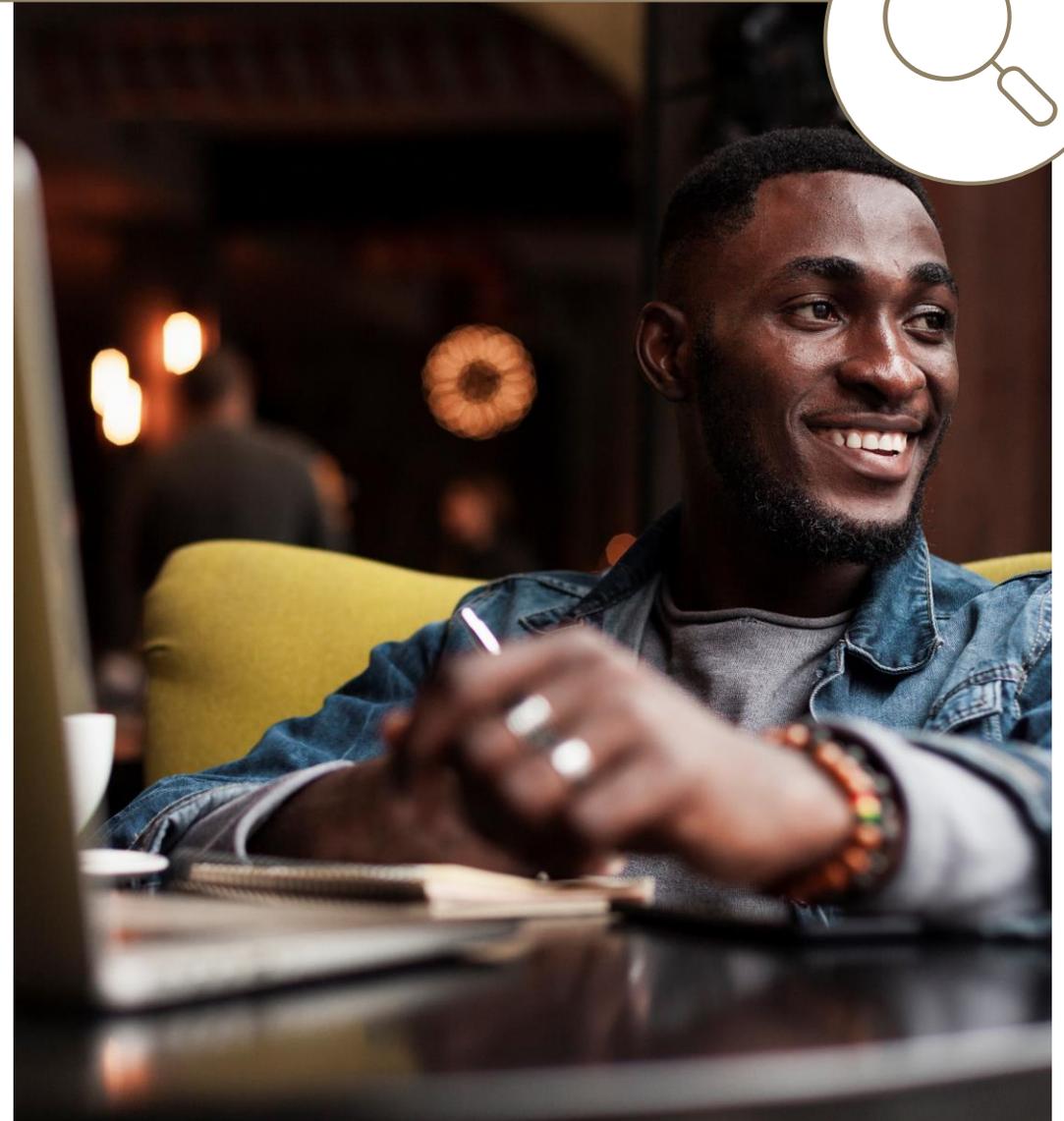
Develop an effective grievance mechanism for any stakeholders to raise concerns

A person's name and phone number identified on documents shared with your suppliers and made publicly available (website/social media) or using an externally provided grievance platform

## Step 2: Identify and assess risks in the supply chain

Step 2 requires analysis of your data collection from step 1 & conducting a risk assessment to identify the following:

- Red flags
- Conflict Affected or High Risk Areas
- OECD Annex II risks or your own risk assessment.
- If any sources of material, transport routes, suppliers or applicable risks are identified as a “red-flag” then you need to conduct step 3.



# List of Red Flags: As defined by OECD

## Red-flag locations (locations of origin and transport)

- The material originates from or has been transported through a CAHRA.
- The material is claimed to originate from a country with limited known supplies (that is, the declared volumes of diamonds or coloured gemstones from that country are out of keeping with its known reserves or expected production levels).
- The material is claimed to originate from a country through which material from CAHRAs is known or reasonably suspected to pass through.
- The material is claimed to be recycled in a country where diamonds or coloured gemstones from CAHRAs are known or reasonably suspected to pass through.

## Red-flag supplier

- Suppliers or other known upstream companies that operate in one of the above-mentioned red-flag locations, or have shareholder or other commercial interests in suppliers from these red-flag locations.
- Suppliers or other known upstream companies are known to have sourced material from a red-flag location in the last 12 months.

## Red-flag circumstances

- Anomalies or unusual circumstances are identified through the information collected, which give rise to a reasonable suspicion that the extraction, transport or trade of the material may contribute to conflict or be associated with serious abuses.

# A CAHRA is marked by

## CONFLICT

Areas in a state of conflict, including armed aggression.

- International conflict
- Wars of liberation or insurgencies
- Civil wars
- Any other armed aggression

## GOVERNANCE

Areas with weak or no governance or security.

- Political instability or repression
- Institutional weakness
- Insecurity
- Collapse of civil infrastructure
- Widespread violence

## HUMAN RIGHTS

Areas with widespread human rights abuses and violations of law.

- Torture, cruel and degrading treatment
- Forced and child labour
- War crimes
- Crimes against humanity
- Genocide
- Widespread sexual violence

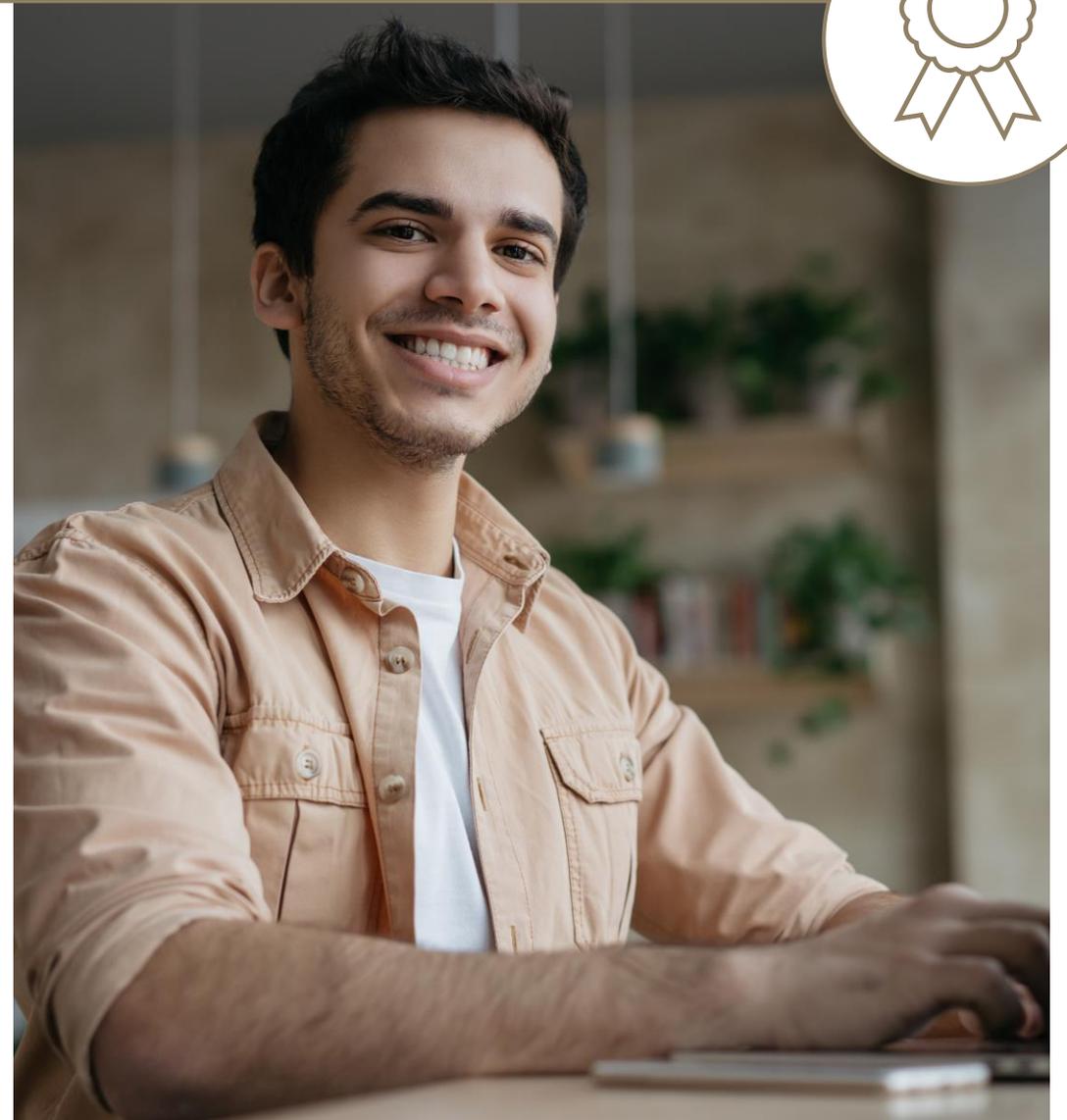
## Step 3: Design and implement a strategy to respond to identified risks

- Step 3 is only required if you identified any red-flags from step 2.
- If you have red flags in your supply chain then you need to develop a plan for managing and responding to actual or potential risks.
- You need to conduct enhanced due-diligence to verify whether your material has contributed to any of the risks.

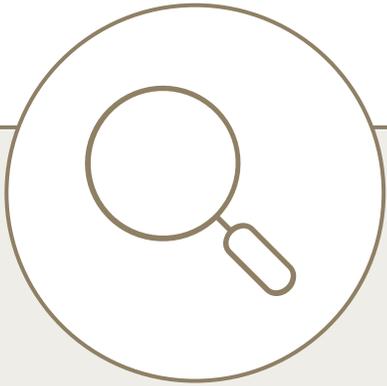


## Step 4: Carry out independent third-party audit of supply chain due diligence

- Step 4 is completed by having your RJC audit.
- An RJC accredited auditor will assess your evidence on whether you have complied and conducted thoroughly steps 1, 2, 3 (if applicable) & 5.
- If there are gaps in your compliance, this is ok, but you must demonstrate good faith efforts and have a plan to address the gaps.



# Step 5: Report on supply chain due diligence



## STEP 1: PREPARE

A summary of the actions  
you have taken

Steps 1 through to 4



## STEP 2: DRAFT

RJC Reporting Templates  
are available

Combine with report for  
COP 3, 6 & 27

Even if all steps are not  
yet complete



## STEP 3: PUBLISH

Sustainability report

Write a letter or email

Publish on your website

Face-to-face engagement

Employees and external  
stakeholders

# 06

## Links

UN GUIDING PRINCIPLES

6.1a: Commitment to respecting Human Rights

6.1b: Focus on your operations and supply chains

6.1c: Remedy as per your involvement (cause, contribution, link too)

6.1d: Report to internal & external stakeholders

POLICY

A written policy on your own operations and your supply chain that outlines your commitment, and is

DUE DILIGENCE

An effective due diligence process that is overseen & coordinated through effective management systems. Including a review to identify & assess human rights impacts, a strategy and action plan to respond to identified impacts, and ongoing monitoring and evaluation of efforts.

GRIEVANCE MECHANISM

Appropriate remedy for any identified actual impact and action to stop it happening again.

REPORTING

Reporting on your efforts to prevent and address human rights impacts at least once a year.

S1: Commitment to responsible supply chains

S2 & S4: Focus on your supply chains

S3: Focus on your supply chains

S5: Information needed varies with business type

OECD GUIDANCE

# Links to other provisions

COP Provision		Manager	Policy	Risk Assessment	Set Procedures	Records	Report	Training	Grievance Mechanism
2	POLICY	✓	✓	✗	✗	✗	✗	✗	✗
3	REPORTING	✓	✗	✗	✗	✗	✓	✗	✗
6	HUMAN RIGHTS	✓	✓	✓	DD	✗	✓	✗	IN/OUT
7	DUE DILIGENCE	✓	✓	✓	DD	✓	✓	✗	OUT
12	KYC	✓	✓	✓	DD	✓	✗	✓	✗
18	DISCIPLINE & GRIEVANCES	✓	✓	✗	HR	✓	✗	✓	IN
29	KPCS AND SOW	✓	✗	✓	DD	✓	✗	✓	✗

07

Member Support

# Is there any support available?

There are number of resources to support you in implementing COP 6 & COP 7



Human Rights Due Diligence  
Toolkit



Risk Assessment  
Toolkit



Due Diligence  
Toolkits



Additional  
Guidance Material



Reporting Templates



Updated  
Online Modules



Provision Specific Training  
Pages



Member Helpdesk  
training@responsiblejewellery.  
com



08

Q&A

## SELF ASSESSMENT: HOW TO PREPARE FOR YOUR RJC AUDIT

### DATES

22<sup>nd</sup> February

[10<sup>th</sup> May](#)

[13<sup>th</sup> September](#)

[8<sup>th</sup> November](#)

### DESCRIPTION

How to prepare for your RJC audit using the self-assessment workbook.

## INTRODUCTION TO THE 2019 CODE OF PRACTICES

### DATES

8<sup>th</sup> March

### DESCRIPTION

Introduction to the 2019 Code of Practices and the requirements for implementing the standard.

## COP 6 & 7 ASK ME ANYTHING

### DATES

22<sup>nd</sup> March

[24<sup>th</sup> May](#)

[27<sup>th</sup> September](#)

[22<sup>nd</sup> November](#)

### DESCRIPTION

The requirements for COP 6 Human Rights and COP 7 Supply Chain Due Diligence of the 2019 Code of Practices Standard.

## COP 14 & 28 ASK ME ANYTHING

### DATES

[25<sup>th</sup> October](#)

### DESCRIPTION

The requirements for COP 14 Provenance Claims and COP 28 Product Disclosure of the 2019 Code of Practices Standard.

## INTRODUCTION TO THE 2017 CHAIN OF CUSTODY

### DATES

[21<sup>st</sup> June](#)

### DESCRIPTION

Introduction to the 2017 Chain of Custody and the requirements for implementing the standard.



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# RESPONSIBLE JEWELLERY COUNCIL

LEAD WITH PURPOSE . . . INSPIRE WITH TRUST  
CONTRIBUTE TO DEVELOPMENT

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