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**NOTE: design this cover as per your own company guidelines**

**INSERT YOUR COMPANY NAME HERE**

**REPORTING REQUIREMENTS**

**FOR COPs 6 & 7**

**ABOUT THIS TEMPLATE**

This reporting template is designed for RJC members\* to fulfil the annual reporting requirements for COP 6 Human Rights & COP 7 Due Diligence within the RJC Code of Practices 2019.

\*This template is designed to fulfil all reporting requirements for non-mining RJC members, all members are welcome to use the templates provided but there are additional reporting requirements for mining members.

**HOW TO USE THIS TEMPLATE**

1. Complete contact information at the top of each section.
2. Using the reporting Requirement and Tip tables as a guide, complete the sections as applicable to your business, do this for each reporting template that you wish to use.
3. Once you have completed all required sections you need to prepare the report for publishing by removing the Requirement and Tip tables.
4. Once you have deleted the guidance tables you will be left with your final report.

## **COP 6 & 7: HUMAN RIGHTS & DUE DILIGENCE**

Contact Information

COMPANY NAME: **[Insert company name]**

DATE: **[Insert Date]**

REPORTING PERIOD: **[Insert Reporting Period]**

CONTACT: **[Insert contact’s email address]**

COMPANY MANAGEMENT SYSTEMS

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| **DELETE THIS TABLE ONCE COMPLETED** | |
| REQUIREMENT | TIP |
| Include details about your policies within your own operations and on all supply chains relating to human rights and enhanced due diligence on minerals originating from conflict-affected and high-risk areas and how they are communicated internally, to suppliers and other stakeholders. | To demonstrate your compliance with COP 6 & 7 you need to have policies in place within your organisation which are endorsed throughout your supply chain, you need to give brief details of what these policies include, how you communicate them throughout your own operations and your supply chain and where they can be found. |

[Insert company name] have the following policies in place [give details e.g. link to policy], detailing our commitment to respect human rights throughout our supply chain and our supply chain due diligence on the following minerals [delete as appropriate to your company gold, silver, platinum group metals, diamonds, emeralds rubies and sapphies] originating from conflict-affected and high-risk areas. [Insert company name] endorse these policies to our suppliers and stakeholders by distributing them via [give details e.g. link to policy], these policies can also be accessed by our internal stakeholders via [give details of where employees will find this information] and externally via [give details of where else these policies can be found for those outside of your business, e.g. website, social media].

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| **DELETE THIS TABLE ONCE COMPLETED** | |
| REQUIREMENT | TIP |
| Internal management systems implemented or in place to support supply chain due diligence including the identification of your human rights impacts. | Describe how you have structured internal management systems and other segments of your business to implement; a human rights impacts commitment, assessment & treatment and; supply chain due diligence process. Identify the senior manager(s) responsible for overseeing human rights and supply chain due diligence. Include a review which identifies and assesses your human rights and supply chain risks, a strategy and action plan to respond to identified risks, and ongoing monitoring and evaluation of efforts. |

To support supply chain due diligence, we have implemented the following internal measures [give details]. The senior manager[s] responsible for overseeing supply chain due diligence [is/are] [position title and name]. To aid us in identifying our human rights impacts we have developed and implemented the follow systems [give details]; we have the following human rights policy in place [give details of where this can be found]. The senior manager[s] responsible for overseeing our human rights impacts [is/are] [position title and name].

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| **DELETE THIS TABLE ONCE COMPLETED** | |
| REQUIREMENT | TIP |
| Your system of controls and transparency over your supply chain and suppliers. | Describe your approach and progress for identifying origin of materials and intermediate actors e.g. for precious metals you need to identify that the refine follows OECD DD, for diamonds & coloured gemstones you need to contact first tier suppliers to provide origin (country or mine) |

[Insert company name] have established a system of controls and transparency over our supply chain, which include our approach for identifying suppliers [give details] and identifying sources of our [materials/products] [give details]. These methods have strengthened our due diligence efforts by [give details].

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| **DELETE THIS TABLE ONCE COMPLETED** | |
| REQUIREMENT | TIP |
| Describe the steps you have taken to strengthen engagement with suppliers. | Examples of this can include establishing long-term relationships with your suppliers, in person visits, fair pricing, remote engagement, communicating your expectations regarding human rights and supply chain due diligence and helping suppliers to build capacity for them. |

As a company we communicate our expectations regarding human rights and supply chain due diligence by [give details]. In addition to this, we also take following steps to strengthen our engagement with suppliers; [give details]; the outcome of doing so has been [give details].

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| **DELETE THIS TABLE ONCE COMPLETED** | |
| REQUIREMENT | TIP |
| Grievance mechanism | Provide details of your internal (employees) and externally (suppliers and throughout your supply chain) available grievance mechanism (as an early warning risk-awareness system), including where it can be accessed and who is responsible for it, how many grievances you have received, how many of these were investigated and what the out-comes were. |

Our grievance mechanism for internal stakeholders can be accessed via [give details of where they can find this], our external grievance mechanism is available via [give details]. Of the [insert amount] of grievances received we investigated [insert amount], the outcomes reported where [give details]. The employee[s] responsible for these grievance mechanism(s) is/are [give name and position title].

IDENTIFIED & ASSESSED RISKS

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| **DELETE THIS TABLE ONCE COMPLETED** | |
| REQUIREMENT | TIP |
| Describe how you have identified and assessed the risks of adverse human rights impact by your operations; and the risks of your suppliers (discovered during your due-diligence activities). Disclose any actual or potential risks or impacts you have identified. Describe how you have assessed your own and your suppliers’ due-diligence practices and practices relating to human rights. | You do not need to disclose the names of specific suppliers here but rather the overall risks. For example, “we have identified a risk of child labour related to 3 suppliers sourcing from country X”. Optionally you can also include the number of incidents of the risk identified, as well as suppliers and the country “We identified x incidents of risk x relating to x (no of) suppliers from x country” |

We assess our own and supplier’s due diligence practices and those relating to human rights by [insert details of how you assess this].

During our assessment of our own and our supplier’s due diligence practices and those relating to human rights, we identified the below potential and actual risks within our supply chain. [Use the below sentence structure to list any risks or potential risks identified]

- We have identified a [potential risk/risk] of [insert risk] related to [detail where in your supply chain (e.g., supplier) including country].

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| **DELETE THIS TABLE ONCE COMPLETED** | |
| REQUIREMENT | TIP |
| Describe how you remedy an identified actual risk or impact caused by your involvement (cause, contribute or link to). Describe the steps taken to strengthen internal control systems and to collect reliable information from your enhanced due diligence. Include in the description of your remediation actions: steps taken to manage risks, including involvement of affected stakeholders; efforts made to monitor and track performance for risk mitigation; number of instances where you decided to disengage from suppliers; and all instances of risk mitigation and results of follow up after six months (if applicable). | The risks you have identified throughout your supply chain pertaining to human rights and the actions you have taken surrounding remediation; and updating your procedures and system so that the chance of the risk reoccurring is reduced. |

To remedy the [list risk identified, and impacts caused by your involvement] we implemented the below changes [changes made] / took the following action [actions taken]. (repeat for each risk).

In addition to this we also have the following changes in actions [give details] and plan to take the following actions in the future [give details]. (if applicable)

- This risk involved [give number of stakeholders] in [give country details].

- [Follow up action taken after 6 months (if applicable)]

As a result of these risks being identified we have also taken the following steps to enhance our internal systems and controls [detail the changes you have made internally].

We monitor and track the performance of risk mitigation by [give details on how this is done].

- As a result of this risk mitigation we disengaged from [number of suppliers disengaged from] in [number of countries and which]. (If applicable. Note, disengagement is a last resort for dealing risk mitigation).

STRATEGY

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| **DELETE THIS TABLE ONCE COMPLETED** | |
| REQUIREMENT | TIP |
| Report findings of the supply chain risk assessment to the designated senior management of the company. | Say who in your company receives the findings of risk assessments (provide position titles e.g., Managing Director) |

Our risk assessment findings are received by [insert position title (name is optional) or name of governance body].

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| REQUIREMENT | TIP |
| Risk management plan | Describe the steps you have taken to design and implement a strategy to respond to the risks and impacts identified (risk management plan). |

To respond to the risks identified within our supply chain, we took the following steps to design and implement a risk management plan [detail how this was done]. Our risk management plan consists of the following [give details on what this includes for each specific risk]. E.g timescales, actions taken, objectives.

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| REQUIREMENT | TIP |
| Implementation of the risk management plan and monitoring performance of risk mitigation efforts. | Disclose your efforts to: implement the risk management plan, monitor, and track the effectiveness of your risk mitigation measures, including the results of your follow-up activities after six months to evaluate significant and measurable improvement. Your tracking activities should relate to actual impacts, and what is being done to manage or remedy them, rather than simply tracking processes or procedures. |

[Use this sentence to detail how you implemented your risk management plan for each risk identified].

To implement our risk management plan we have taken the following risk mitigation steps [give details of the steps taken for implementation for each risk identified]; and we continue to monitor the plan and track the effectiveness of these risk mitigation measures by [give details]. In addition to this, we evaluated improvement of this risk after six months through [details how you followed up] the result of which was [detail the findings of your follow up].

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| **DELETE THIS TABLE ONCE COMPLETED** | |
| REQUIREMENT | TIP |
| Include the detail of any applicable training provided to staff or contractors. | Details of any training you have provided to your employees and contractors regarding human rights risks and supply chain due diligence. |

[Insert company name] provided the training regarding human rights to our [employees and/or contractors] on [give dates]; this training included information on [give a brief summary of the training provided]. We have also provided training regarding our due diligence activities to all of our [employees and/or contractors] on [give dates]; this training included information on [give a brief summary of the training provided, this can include the audience, frequency of training and topics covered].

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| REQUIREMENT | TIP |
| Describe how you communicate internally and externally with stakeholders on your due diligence activities and efforts to prevent and address human rights risks. When you identify a human rights risk, describe how you communicate with potentially affected stakeholders to explain how you are addressing the risk. | Describe how you communicate internally and externally with stakeholders on your due diligence activities and efforts to prevent and address human rights risks. When you identify a human rights risk, describe how you communicate with potentially affected stakeholders to explain how you are addressing the risk. |

[Insert company name] communicate to our stakeholders regarding our due diligence activities and efforts to prevent human rights risks. This communication is in the form of [communication methods, if multiple please list]. When a human rights risk is identified we communicate the risk and how we are addressing it to potentially affected stakeholders by [detail how you communicate this].

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| REQUIREMENT | TIP |
| Detail a summary of any grievances received and how you handled them (remediation actions). | Any grievances raised since your previous report and how you have addressed them, you do not need to include identifying details but an overview on the grievance raised and how you remediated it. |

Since our last report [no grievances have been raised] [the following grievances have been raised] regarding human rights risks or our supply chain due diligence:  
- [Grievance(s) raised]  
- [List the remediation action to address the grievance]

CARRY OUT A THIRD PARTY AUDIT (OPTIONAL INFORMATION)

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| **DELETE THIS TABLE ONCE COMPLETED** | |
| REQUIREMENT | TIP |
| RJC COP audit | Consider including a summary of your RJC COP audit, including the date of the audit, the audit activities and methodology and the findings. |

[Insert company name] has joined the RJC in [year] and has since achieved [number] [1/3 year, as applicable] certifications.

In support of our continuous improvement journey, our latest third-party RJC audit took place within our organisation against the RJC COP 2019 on [insert date].