

PROGRESS REPORT 2023

AN ERA OF ACTION

Responsible Business
is Good Business



RESPONSIBLE
JEWELRY
COUNCIL

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A message from RJC Chair David Bouffard and Executive Director Melanie Grant



David Bouffard

David Bouffard
Chair



Melanie Grant

Melanie Grant
Executive Director

Dear valued RJC members and stakeholders,

We are very proud to present the Responsible Jewellery Council's 2022/23 Progress Report. We would also like to take this opportunity on behalf of the RJC team to say 'thank you' to all our valued members and stakeholders worldwide for your continued support and commitment to the world's leading sustainability standard setting organisation for the global jewellery and watch industry.

We were delighted to welcome Melanie Grant as our new executive director at the start of 2023. Melanie comes to us with a background in award winning journalism and curating key global exhibitions - the latest being, 'Crown to Couture' at Kensington Palace in London. These influential qualities and passionate talents will help bring a new audience and expand the horizon for the RJC. It is exciting times for us all to witness the implementation of a new coherent and long-term vision for the RJC.

As you know, the RJC has been building a movement committed to the evolution and continuous improvement in the integrity of the watch and jewellery industry in terms of sustainability, chain of custody, education, human rights, social-economic diversity, and inclusion. We are raising the bar of expectations and looking to the future of our industry. For the first time ever this year, the RJC, GIA and MGMH at Harvard University come together to host the 'State of the Art' Jewellery Summit where industry leaders, experts, academics, and brands will discuss the future of responsible jewellery. As part of this think tank summit at Harvard the RJC will launch its first ever ESG toolkit, created as a blueprint for members to apply environmental, social and governance to their businesses globally. This is an important moment for us.

In today's world, communication and transparency are key as we navigate the challenges presented by climate change, social injustice, and geopolitical conflict. We continually evolve in line with international law, including that of the US, G7, EU and the UN's COP2019. We continue to provide industry-leading certification for watches and jewellery as a trusted and respected resource, and the only international standards organization in the world uniquely accredited by ISEAL.

But there is more to do. As the practical application of responsible practises grow more complex, we strive for deeper partnerships so that we might build a future that we're proud to pass on to the next generation. Our industry is built on relationships after all, and the communities that bind us together.

In that spirit we would also like to thank the RJC team for their loyal dedication and tireless work in supporting our members on their journey. All who encounter the RJC have commented on the level of expertise our team possess which is evident by a record number of members this year and 121 applications in the first quarter alone demonstrating an ever-growing desire for our standards.

**We are incredibly proud of our achievements to date.
The future is bright. We are thrilled you will be part of it.**



CHAPTER 1

The RJC at a Glance

1.1 WHO WE ARE

Formed in 2005, by 14 top-tier brands and financial institutions (ABN AMRO, BHP Billiton Diamonds, Cartier, World Jewelry Confederation, Diamond Trading Company (part of De Beers Group), Diarough, Jewelers of America, National Association of Goldsmiths (UK), Newmont Mining, Rio Tinto, Rosy Blue, Signet Group, Tiffany & Co., and Zale Corporation), we are the world's leading standard-setting organization for the watch and jewelry industry.

Jewelry plays a special role in people's lives, carrying personal and emotional significance. We bring together over 1700 members of all sizes, across the global watch and jewelry supply chain, from retail to mining. What unites us is the shared belief that responsible business, without causing harm to people or the planet, is good business and that this can only be achieved by working together, in partnership with others. In doing so, we are enhancing trust in the global jewelry and watch industry and underpinning its future, so people continue to hold jewelry close to their hearts for centuries to come.

1.2 WHAT WE DO

We stand up for integrity, through our supply chains, in our work and for our members. Through the implementation of the Code of Practices (COP), we work to ensure that responsible standards are upheld right across the global jewelry and watch supply chain. Our team of experienced professionals manage and maintain the standards, ensure that RJC-approved auditors assure the standards effectively, and issue members with a certification once the required due diligence is completed. We also have an important role to play as the voice for the industry on its most critical Environmental, Social and Government (ESG) issues, helping to accelerate collective progress towards the Sustainable Development Goals (SDGs).



RESPONSIBLE
JEWELRY
COUNCIL

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

OUR MISSION, VISION, AND VALUES

Mission

We strive to be the recognized standards and certification organization for supply chain integrity and sustainability in the global jewelry and watch industry.

Vision

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

Values

These values guide our decisions and actions:

- We are respectful and fair
- We practice honesty, integrity, and accountability
- We engage in open collaboration

Our journey timeline



CHAPTER 2

Governance

2.1 RJC GOVERNANCE REVIEW

RJC governance is under constant review and improvement where necessary. Since 2021, several changes have been developed and implemented, especially with respect to due diligence applied to commercial membership applicants. .

The new member application documents were extensively amended to strengthen due diligence following AML/CTF due diligence guidance from the Financial Action Task Force. The RJC also adopted the Reuters World Check due diligence database which includes sanctions, criminal records, negative media, and a wide range of individual and company data. All applications are subject to due diligence checks using World Check.

In 2021, the RJC also commenced work to digitize the application document, allowing applications to be completed online and allowing for supporting documents to be uploaded digitally. The project was completed in 2022.

Following the Russian invasion of Ukraine, the RJC commissioned London law firm Addleshaw Goddard to provide a report to the Board relating to the Ukraine and sanctions issue. Addleshaw Goddard was further commissioned to:

- A) Draft amendments to the Commercial Membership Application Form and Membership Agreement, the Articles of Association and other relevant governance policies, to provide the RJC Board of Directors with greater authority to discipline RJC Members.
- B) These enhanced powers to be applicable in circumstances where an RJC Member has been sanctioned (directly or indirectly) by a Government or Regulatory body, specifically, but should also be applicable on the occurrence of other unprecedented or unforeseen events and include immediate automatic suspension of membership or other disciplinary action.

The application documents have been further amended based on the legal advice. These amendments have been further strengthened with revised Articles of Association (the RJC's primary constitutional document, sometimes referred to as By Laws).

The RJC also commissioned Beyond Governance to undertake an independent review of all governance documents and procedures. Beyond Governance found the RJC's governance to be robust and thorough but recommended some improvement opportunities including Director training covering obligations under the UK Companies Act.

RUMA Diamonds
Maneesh Kumar
Manager

“ With RJC our company’s reputation has increased and our customers gained confidence.

Also RJC helped us in networking, it is the best platform to do business responsibly. In short RJC is the gateway of success.”



2.2 REVISED ARTICLES OF ASSOCIATION

The RJC Articles of Association (constitution) have been extensively amended. The amendments were designed to achieve the following::

1. Address the need for specific reference to sanctions.
2. Define the terms “reputational harm and disrepute” with the addition of “dishonorable, improper or unprofessional conduct”, including a non-exhaustive list of examples.
3. Establish a clear power to act in the event of the above circumstances.
4. Clarify as far as possible the circumstances which would trigger disciplinary action, including suspension or termination of membership.
5. Limit the discretionary aspect with respect to a member subject to sanctions or acting in a manner to cause reputational harm to the RJC.
6. Strengthen the level of information provided by applicants, thereby improving the level of RJC due diligence in respect to an application.
7. Introduce a binding contractual agreement between the member and the RJC, providing authority for the RJC to act in the event of a breach by the member.

A.Gul KG
Alexander David Gul
COO

“ By implementing RJC’s rigorous standards, we’ve strengthened our supply chain integrity, ensuring all diamonds are responsibly sourced. This has enhanced our reputation and led to greater brand recognition. RJC has also fostered trust with our customers, directly increasing customer loyalty and satisfaction. Lastly, through the RJC’s guidance, we’ve been able to mitigate potential risks related to sourcing and compliance, safeguarding our brand’s reputation and operational efficiency.”

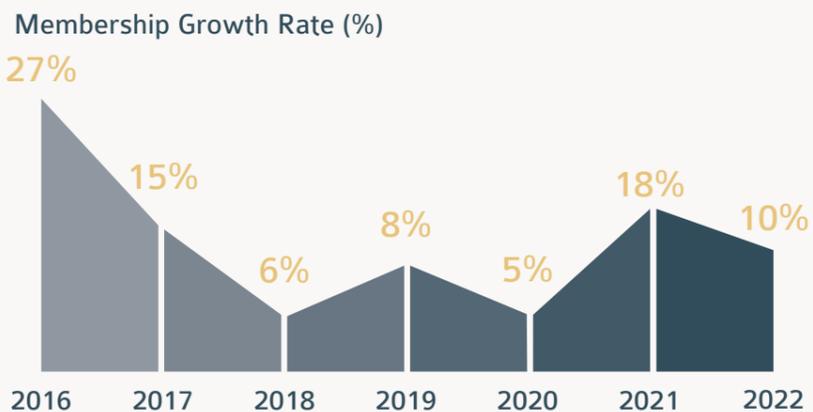
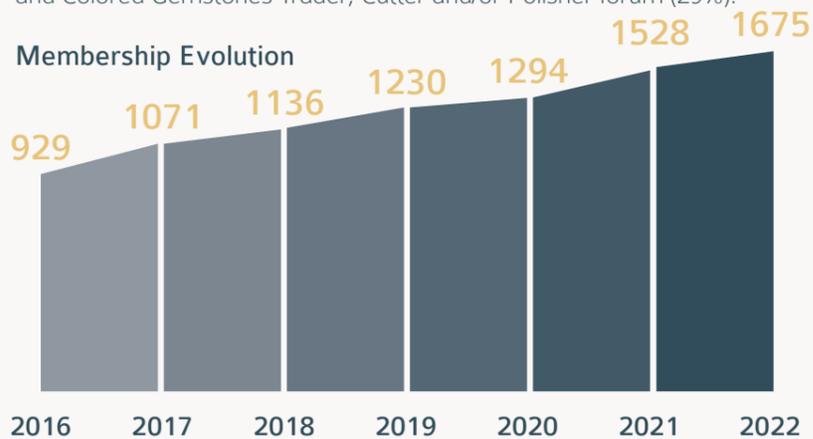
CHAPTER 3

Membership

We have grown from 14 founding members to 1,675 global members. (as of Year End 2022).

3.1 MEMBERSHIP GROWTH SINCE 2016

The majority of RJC members belong to the Jewelry and Watch Manufacturer and/or Wholesaler forum (54%), followed by the Diamonds and Colored Gemstones Trader, Cutter and/or Polisher forum (29%).



We saw a sharp rise in the membership growth rate in 2021 as a result of companies having to delay applying for RJC membership due to the pandemic. In 2022, the growth rate is at 10%. This is at a lower level than 2021 but higher than the 3 years prior from 2018. With low membership termination numbers, the retention rate continues to remain at a high level

3.2 MEMBERSHIP SNAPSHOT 2022

Total number of members at Year End (YE) 2022:

1675



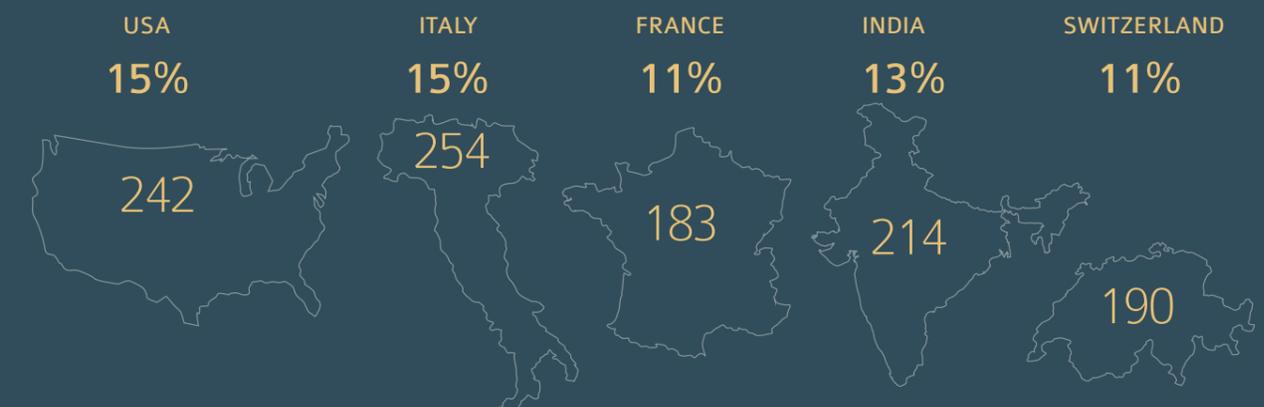
Membership growth rate for 2022

1657 Commercial members
 18 Trade association members
 +147 Members joining in 2022

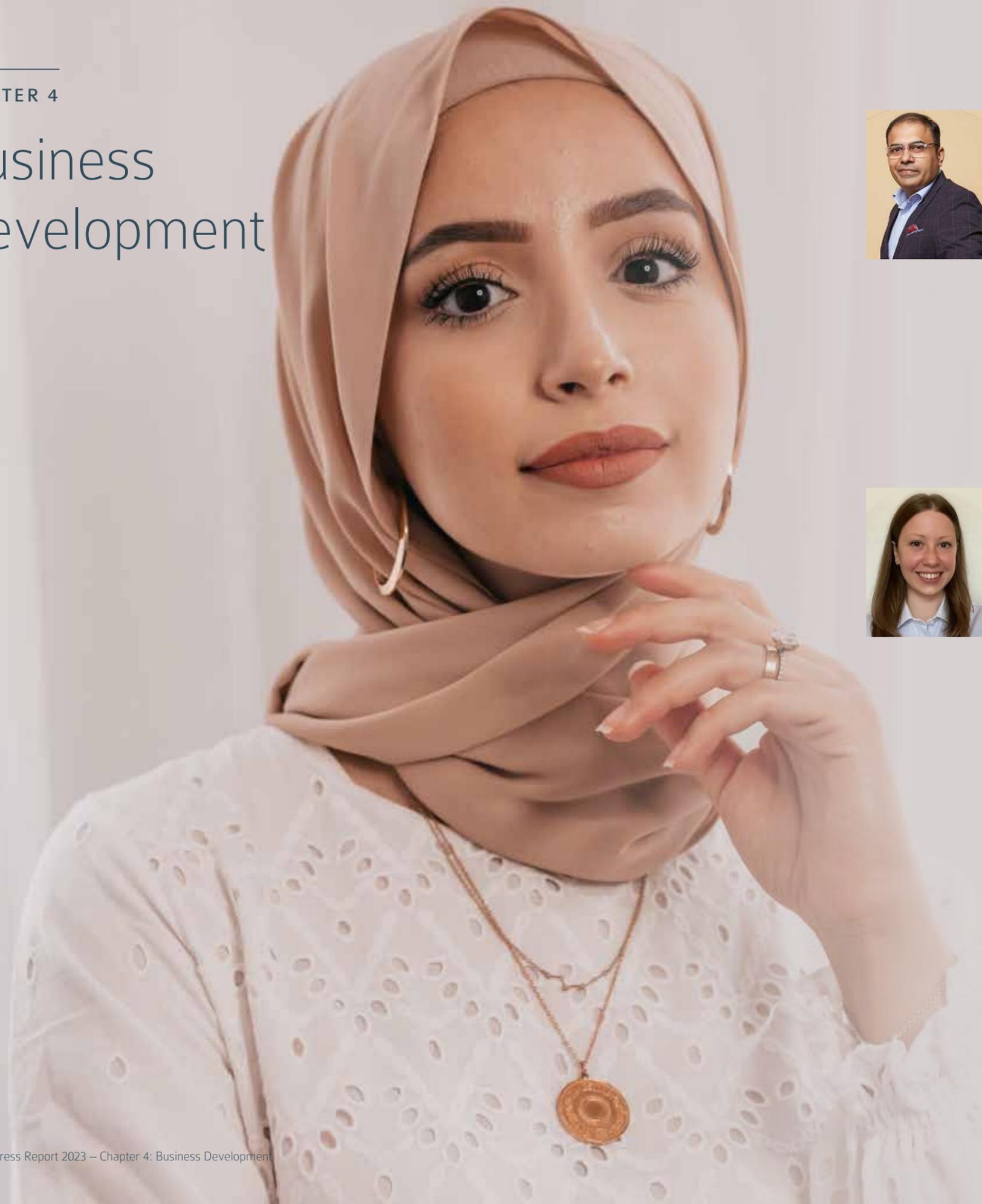
Membership Breakdown by Forum 2022:

Forum	Members	Percentage
Diamonds, Colored Gemstones & Precious Metals Miner	14	1%
Precious Metals Trader, Refiner and/or Hedger	127	8%
Diamonds and Colored Gemstones Trader, Cutter and/or Polisher	492	29%
Jewelry and Watch Manufacturer and/or Wholesaler	909	54%
Jewelry & watch retailers	92	5%
Service industries	23	1%
Association	18	1%

Top 5 countries for Member HQs, representing 65% of all members:



Business Development



4.1 ASIAN MARKET



Kinjal Shah

Head of Asian Development

2022 was a year of immense challenges and geopolitical upheaval. Efforts have been made to convert these challenges into opportunities to ensure continued growth and visibility for RJC in Southeast Asia.

Jewellery Arabia and Surat Jewellers Manufactures association have joined RJC as supporter members, with conversations underway with a further 5 Trade Associations. RJC continued its collaboration with the Gem and Jewellery Institute of Thailand (GIT) with membership numbers amassing 100. Membership has been achieved with two large diamond cutters and polishers from India. A further three retailers from China, India & UAE have joined the RJC.

Several speaking opportunities have been created to facilitate awareness of the RJC within India, UAE & Thailand.

4.2 EUROPEAN MARKET



Alyssa Fontaine

Head of European Development

Europe is unique sector, comprising of many different countries, cultures, languages, and history within one small continent. This blend of skillsets has generated centuries of fantastic manufacturing in the jewellery and watch industry, offering top quality finished products.

There has been a growing interest in the EU to learn about the work of the RJC and how its standards can be practically applied to business. I see the industry coming together to work collectively towards common goals and work in a responsible manner, connected through a shared passion for the trade.

To remain agile in a fast-paced, ever-changing environment, companies need strong management systems. Having strong management systems in place helps a company to be flexible and adapt to change with ease.

I am thrilled to see the London Jewellery Show and the Istanbul Jewellery Show joining the RJC as supporters. I wish to extend my thanks to Inhorgenta Show, Munich Show, Vicenzaoro, Jewellery Show and Istanbul Jewellery Show for their hospitality and for continuously offering a great platform for the trade to connect.



CHAPTER 5

Digital Projects

Our mission to leverage digital technologies to create better ways of serving, supporting, and enabling our members and stakeholders continues to be central to our digital transformation journey.

5.1 MEMBER PORTAL

Since the launch of our Member Portal at the end of 2021, onboarding, and support in accessing the portal is a key focus.

Over 60% of our member organisations have logged in, with a steady increase month on month as the member portal has become the go-to source to:

1. Pay subscription fees.
2. Download certificates and logos.
3. Download marketing resources.
4. Access first audit and recertification resources.
5. Submit scope change and contact management details.

Through our approach of continuous improvement, new features and digital services will be added to optimise online membership value in an increasingly digital-first landscape.



5.2 DIGITISED APPLICATION SYSTEM

In November 2022, we launched our digital Membership Application platform for Commercial and Trade Association applicants.

Commercial applicant organisations are required to complete our enhanced due diligence commercial application form and disclose relevant information about company/group structure, materials in scope, business activities, registration, ownership, and control along with providing supporting documentation, where required.

This enables RJC to be compliant with UK Money Laundering and Terrorist Financing (Amendment) 2019, KYC and ISEAL Alliance Regulations.

5.3 AUDITOR PORTAL

Phased development of our Auditor Portal is now in progress. We are collaborating with key stakeholder groups on requirements and aligning on user personas, features, and functionalities, which will strengthen our partnerships to uphold the standards throughout the supply chain.

Ongoing development and updates to our digital platforms will continue to place user experience at the core, whilst ensuring adherence with regulatory requirements and digital best practice.

Standards

As a standard setting organisation, standards are at the heart of the RJC's work. The RJC enables members across the watch and jewellery industry to implement responsible practices into the core of their business activities.

RJC standards have an important role to play in shaping the future of the industry to one that is responsible, equitable, and has a positive impact both in organisations and on the ground.

RJC Standards must remain fit for purpose in an evolving regulatory landscape as well as in line with changing consumer expectations. This is why our standards and the process in which they are developed and reviewed, must be inclusive, robust, and credible.

6.1 OUR STANDARDS AT A GLANCE

6.1.1 Code of Practices (COP)

The RJC Code of Practices defines the requirements for responsible business practices throughout the jewellery and watch supply chain, from mine to retail. It provides a common standard for ethical, social, human rights and environmental practices. COP certification is mandatory for all our commercial members.

COP certification provides a strong system for certified members to assure stakeholders, customers, suppliers, and business partners that they conduct their business responsibly.

More importantly, COP certification can reduce risks and vulnerabilities in a company's supply chain and improve management systems and operating procedures to strengthen the business, making it more resilient and sustainable. It simultaneously leads to better social and environmental conditions within the broader industry, bringing positive impacts for workers, communities, and the environment.

The COP includes human rights, labour rights, health and safety, product integrity and the environment. Third party auditors review the management practices and certification is granted if the organisation is compliant with the COP. The COP is comprehensive in its application to the various supply chain points, covering all aspects including mining, refining, cutting, and polishing, manufacturing, and retail.

The COP details management practices to ensure responsible business including labour and human rights due diligence, health and safety, gender equality, non-discrimination and product integrity and disclosure. The 2019 COP is also aligned with the OECD Due Diligence Guidance for Responsible Supply Chains for Minerals from Conflict-Affected and High-Risk Areas and the UN Guiding Principles on Business and Human rights.



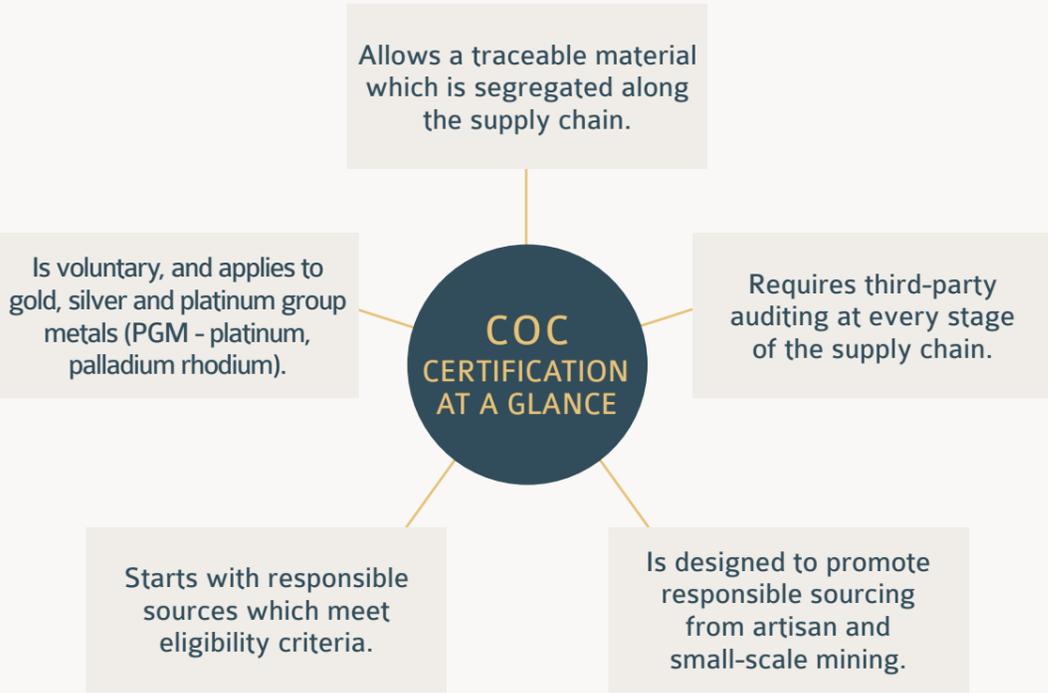


6.1.2 Chain of Custody (CoC)

The RJC Chain-of-Custody Standard defines an approach for companies to handle and trade gold, silver and platinum group metals in a way that is traceable and responsibly sourced. CoC certification is voluntary and complements certification against our COP, which is mandatory for all members.

A CoC is a documented sequence of custody of material as it moves along the supply chain. Our CoC Standard, first developed in 2012, defines the requirements for creating a CoC of precious metals that are responsibly produced, processed, and traded through jewellery and watch supply chains, and that are third-party assured at every stage.

CoC certification is a strong system for companies in the precious metal supply chain via third-party verification of their segregation and material's control seeking a point of differentiation and reassurance for their customers, consumers, and other stakeholders. This can add value to jewellery and watch products and help protect and enhance jewellery brands. .



6.2 ENSURING THE CREDIBILITY AND ROBUSTNESS OF OUR STANDARDS

6.2.1 The role of the RJC Standards Committee

The role of the Standards Committee is to review and support the RJC management team with the development and creations of RJC standards. The committee assists in the design and content of the RJC standards. They can also discuss broader strategic issues as the need arises, particularly issues that have an impact on the standards. The Standards Committee comprises up to 14 industry members and up to 14 non-industry members.

6.2.2 The role of the ISEAL Alliance

Confidence in our standards is critical to promote trust in our industry. Our full membership with ISEAL, the global hub for sustainability standards, provides this confidence. The RJC is the only ISEAL full member for sustainable standards and practices in the jewellery industry, and this reaffirms RJC's position as the leading standards authority in the global watch and jewellery supply chain. As a full member we commit to ISEAL's Mission and Code of Ethics and comply with ISEAL's Codes of Good Practice. Membership of ISEAL helps us continue to improve our standards development and implementation in an inclusive way, share knowledge and experience with other industries, and guarantee rigor in RJC certification programs.

ISEAL is the global membership association for credible sustainability standards, and through their work they explore ways to increase the effectiveness and efficiency of sustainability standards and identify opportunities for innovation that increases the uptake of credible standards. ISEAL support their members to work towards collective priorities that address the most pressing social and environmental issues we face in the world today.

6.2.3 Our approach

Our inclusive and collaborative approach to standard setting and development keeps RJC standards relevant and meaningful to businesses throughout the entire jewellery and watch supply chain. To maintain the credibility of our standards development system we comply with the ISEAL Codes of Good Practice and conduct open and transparent public consultations when reviewing and updating our standards.

At RJC we hold a combination of webinars, teleconferences, direct consultations as well as access for public online feedback to engage with all our stakeholders. All consultations seek to obtain a balance of interests and geographic scope.

6.2.4 Standards review cycles

Effective standards drive the adoption of sustainable business practices. Regular reviews of our standards ensure they remain fit for purpose. Our standards review process is a minimum of every 5 years, as per ISEAL standard setting code requirements.

The Code of Practices was last revised in 2019, previously in 2013, and first released in 2009. In 2021 we began an update of the COP, and have continued this work throughout 2022, hosting public consultations, discussions and working closely with our Committee. The COP update looks to receive stakeholder feedback on the expansion of the material scope to include all coloured gemstones, pearls, and corals as well as review specific provisions, such as human



rights, product disclosure and gemmological laboratories. This update is ongoing and will roll into a full review of the standard. This aims to conclude in 2024.

The Chain-of-Custody was last revised in 2017, and the next revision was launched in 2022. In 2022, RJC conducted one round of public stakeholder consultation, including roundtables, discussions, and online feedback as part of this.

In 2021 we also started the development of Laboratory Grown Material standard for laboratory grown diamonds and coloured gemstones.

One round of consultation has been hosted on this standard, with further consultations to be held in 2023.

As part of all updates and reviews, RJC follows the ISEAL standard setting code which includes at least two rounds of 60-day commenting period, with each round creating a summary of comments published to our website. The commenting period is a public consultation and welcomes comments from any stakeholder. This process will undergo a second round of 60 days, and a third round only if needed, and the standard -setting process as well as the feedback from the consultations are made publicly available on our website, social media platforms and broader RJC communications.

6.2.5 A push towards transparency

Transparency is a growing concern for standards, not only for awareness of member performance but also on material supply chains. There is an increased expectation from civil society and other stakeholders for greater transparency within business activities and supply chains. The counterpoint to the demand for greater transparency, is the historical and deeply entrenched business confidentiality that is at the centre of the jewellery and watch industry. Jewellery and watch companies are concerned by the possible business impacts that greater transparency may have, hence a balance between the two must be sought.

The march towards greater transparency is not going away and is highly likely to become enshrined in legislation. However greater transparency should not be seen as a negative. Engaging with suppliers and customers to better understand supply chains can lead to strengthened business relationship with key suppliers and customers, a more robust diffusion of responsible practices, as well as a greater understanding to address the significant risks for all businesses.

Ankit Gems
Rajesh Kanadia
CFO

“ RJC has given us Global recognition which has helped us to achieve our goals and targets. Also Implementing RJC Standards has helped us improve our core and non-core Management systems, Protecting the supply chain integrity that helps our consumers to build confidence.”





An Interview with Ainsley Butler

Ainsley Butler

Non-Industry Joint Chair,
RJC Standards Committee

Q: Please can you introduce yourself, and tell us how you got involved as the non-industry Co-Chair on the RJC Standards Committee?

A: In 2015, I embarked on a remarkable journey as a member of the RJC Standards Committee. My participation coincided with my involvement in the development of a pioneering standard specifically focused on artisanal diamond mining. I was also actively engaged in supporting projects aimed at empowering and uplifting artisanal diamond mining communities in Sierra Leone and the Democratic Republic of Congo (DRC). Since this time, I have worked on many initiatives related to sustainability, responsible sourcing, and economic development.

There have been several notable highlights that have enriched my understanding and broadened my perspective of the jewellery industry. One memorable experience was a visit to Surat, India, an important hub for jewellery manufacturing. This visit offered a unique opportunity to witness first-hand the opportunities and challenges faced by workers in the diamond value chain.

I also had the privilege of visiting a luxury watch manufacturing facility in Switzerland, a renowned center of horological excellence. This visit allowed me to delve into the precision, artistry, and intricacies of watchmaking, which revealed the dedication, meticulousness, and technical expertise required to produce these exquisite pieces.

Observing the gold refining process, a fundamental step in the jewellery production chain, was also instructive and helped to emphasize the importance of responsible sourcing and sustainable practices within the industry. Understanding the refining process enhanced my awareness of the environmental and ethical considerations that should be considered when working with precious metals.

Thanks to my participation in the Standards Committee, these experiences have been instrumental in shaping my perspective and deepening my appreciation for the various facets of the jewellery industry. They have underscored the significance of responsible practices, craftsmanship, and the interconnectedness of global value chains. As I continue my journey, these highlights will remain as vivid reminders of the diverse and intricate nature of the jewellery industry, motivating me to contribute to its responsible and sustainable development.

Being elected as the Joint Chair of the committee was truly an honour for me! Collaborating closely with the dedicated committee members and RJC team has been an incredibly enriching experience. I am grateful for the opportunity to contribute to such important work and look forward to continuing our collaborative efforts to shape the future of the jewellery industry in a responsible and impactful manner.

Q: What do you think are the RJC's greatest challenges as an organisation from a non-industry perspective?

A: Throughout its history, the RJC has encountered and overcome various challenges, exemplifying its resilience, as demonstrated by the organization's proactive response to these challenges. For example, in the past year, the RJC embarked on a thorough review of its governance structure, a crucial step towards ensuring its ability to adapt and effectively address unforeseen circumstances in the future. Through its commitment to continuous improvement, the organization strengthens its ability to lead and shape the industry, fostering trust, accountability, and sustainability.

The RJC also recognizes the paramount importance of maintaining exemplary and industry-leading standards. In addition to undertaking the review of its Code of Practices and Chain of Custody standards this year, it's exciting that the organization is developing a new standard related to lab-grown materials. By continuing to convene the Standards Committee, and adhering to the ISEAL Code, the RJC ensures that its standards remain at the forefront, setting a high bar for the entire industry.

Q: How does the RJC collaborate with non-industry stakeholders to address these challenges?

A: At the heart of the RJC's mission lies the responsibility to champion responsible practices within the jewellery industry. This commitment is exemplified by the work carried out by the Standards Committee, which plays a pivotal role in the standard-setting process. Through its collaborative approach, the committee brings together industry experts and non-industry stakeholders to drive positive change. By actively engaging with a diverse range of perspectives, the committee ensures that the RJC standards reflect the evolving needs and challenges of the membership, to enable them to demonstrate their responsible practices towards their business partners, customers and within the communities in which they operate. I believe that the committee's multi-stakeholder approach also helps to foster trust and build confidence among consumers, stakeholders, with governments, and the wider public.

Sustainability is also at the core of the committee's mandate. By addressing environmental impacts, promoting responsible sourcing, and encouraging responsible business practices, the committee's work actively contributes to a more sustainable future for the jewellery industry.

Q: What makes the role of non-industry Standards Committee members critical to this?

A: The non-industry Standards Committee comprises a diverse and accomplished group of practitioners and experts, encompassing a wide range of topics that are relevant to responsible practices. These dedicated individuals volunteer to bring their expertise in areas such as human rights, labour rights, gender equality, health and safety, artisanal and industrial mining, anti-money laundering, environmental protection, standard-setting procedures, disclosures, laboratory procedures, and more! Additionally, their proficiency also encompasses the entire value chains of diamonds, gold, and coloured stones.

The inclusion of such a comprehensive range of expertise within the committee is of immense value. Integrating the perspectives of both industry representatives and external specialists creates a powerful synergy, which helps to ensure that the standard-setting process is robust. This collaborative approach ensures that multiple viewpoints are considered, fostering a well-rounded and comprehensive set of standards. By embracing a range of perspectives, the RJC can remain at the forefront of responsible practices, contributing to the ongoing improvement and evolution of the industry as a whole.

Q: Final thoughts?

A: I extend a warm invitation to all practitioners and experts who possess knowledge and expertise in the areas covered by the RJC standards to consider participating in the standards committee. Your valuable insights and diverse perspectives are vital in shaping the responsible practices within the jewelry industry.

If you are passionate about promoting responsible sourcing, sustainable practices, human rights, labor rights, environmental protection, or any other relevant field, I encourage you to reach out to the RJC team. They will provide you with the necessary information and guidance on how to get involved.

CHAPTER 7

Training

7.1 HOW TO PREPARE FOR YOUR RJC AUDIT

Charlotte Stanbridge from Standards and Training has highlighted her 5 top tips to help members prepare for their RJC audit.

1. Review the standard and assign responsibility

The best place for members to start is by reviewing the standard against which you're having your audit, the 2019 Code of Practices (COP) or the 2017 Chain of Custody (CoC), and build a familiarity with the requirements. You should then assess who in your company is best placed to manage the RJC audit process and assign them this responsibility. They don't need to prepare for the audit alone, but they need to have a good knowledge of your business, existing policies and procedures and the different teams who can support in audit preparation.

2. Complete a self-assessment

The best way to ensure a smooth audit process is with a self-assessment, this is the first step towards your certification, where members carry out a self-assessment of their organisation and its facilities. A self-assessment is like an internal audit or a pre-assessment to review your performance against the COP or CoC.

A self-assessment enables members to:

- Define the certification scope, by identifying those parts of their business which actively contribute to the jewellery supply chain.
- Review their business practices against the requirements of the COP. This provides the opportunity to identify any areas of non-conformance and address them in advance of auditing.
- Assemble the relevant information to enable the auditor(s) to work efficiently and effectively.

If you did not conduct self-assessments, audits can be more time consuming and have a much greater likelihood of finding non-conformances. It is recommended to complete the self-assessment workbook thoroughly and well in advance of your audit. Members are free to conduct their own self-assessment or alternatively the RJC have self-assessment workbooks for both the COP and CoC.

When working through the self-assessment and preparing for your audit, it's good to enlist the help of relevant team members. Identify who in your team is best placed to implement certain provisions and identify any policies or procedures that are already in place.



Charlotte Stanbridge
Assistant Standards
and Training Manager

3. Contact your chosen audit firm

Once you are ready to be audited, you can proceed with the appointment of an RJC-approved audit firm. It's recommended that you contact more than one audit firm so that you can get a good sense of auditors' availability and commercial terms. This is a key step for RJC members as you're able to choose your own audit firm and manage your relationship with audit firm directly.

If you need to be audited against more than one RJC standard for example COP and CoC within a similar timeframe, you may wish to arrange simultaneous audits to reduce duplication of effort and minimise costs.

After finalising the agreement with your auditors, make sure you send them your completed self-assessment, at this stage you don't need to have closed out your non-conformances, but you should have a corrective action plan in place for addressing any issues that you've identified.

4. Review available RJC support

At the RJC we have a number of resources available to support our members in implementing both the COP and the CoC. For each standard, we have a guidance document which takes you through the requirements to implement each provision. We have a dedicated training page, modules, live webinars, and a toolkit library which features templates and toolkits that will help you implement the requirements of our standards, all of which can be found on the RJC website.

5. Contact us!

It's crucial that we support our members throughout their RJC journey, whether it's preparing for an audit or understanding the requirements of the 2019 Code of Practices and the 2017 Chain of Custody. That's why we have a dedicated support mailbox at training@responsiblejewellery.com.

9 

Webinars in 2022

- 9 webinars hosted

627 

- 627 registrations

308 

- 308 attendees



- Topics included: How to prepare for your self-assessment, COP 6 & 7 ask me anything, Introduction to the 2019 Code of Practices, and Introducing Environmental Sustainability

Assurance

The purpose of the Assurance Department is to ensure a credible and quality audit, conducted by objective and competent RJC approved auditors. A robust audit process supports members to implement and maintain the RJC's Code of Practices and Chain-of-Custody, as a pathway for companies to address sustainability best practices, responsible sourcing, and supply chain due diligence.

8.1 CRITICAL BREACHES AND DISCIPLINARY PROCEEDINGS

8.1.1 What are they?

A **COP critical breach** is any major non-conformance identified against COP critical provisions (6.1, 7.1, 16.1, 16.2, 17.1, 17.4, 18.1, 19.1, 19.2, 20.1, 22.1, 25.2, 26.2c, 28.1, 29.1, 33.1, 38.1, 38.2, 38.4, 39.2a, as per the RJC Assessment Manual p. 34, Table 6).

A **CoC critical breach** is a critical non-conformance raised against any of the CoC provisions, supported by objective evidence triggered by deliberate falsification of information required to support a conformance rating; or a systemic failure of the management system to implement the CoC; or total lack of controls needed to manage business risks to the CoC.

Disciplinary proceedings against an RJC member can be triggered by a complaint, judgements of a court of law, or other indicators of poor performance or failure to comply with the RJC requirements, such as a critical breach, as per section 5.2 page 18-19 of the RJC Assessment Manual. Disciplinary proceedings also apply to RJC approved audit firms.

8.1.2 How does the RJC handle them?

If a critical breach is identified during an RJC audit: the auditor must notify both the member and the RJC within 3 (three) working days of identifying it and provide full details. The audit must be completed.

After a critical breach is identified:

- **Member suspension** takes place from the RJC website while the critical breach is under review.
- Member has **4 (four) weeks** from formal notification to submit a corrective action plan AND evidence of implementation in relation to the critical breach.
 - o Member can access online resources such as RJC Toolkits & templates and COP 2019 provision walkthrough, as well as request support by emailing training@responsiblejewellery.com.
 - o Regular member training webinars are held by the RJC on specific provisions such as COP 6 Human Rights and COP 7 Supply Chain Due Diligence, as per our Events page.
- Auditor has **2 (two) weeks** to review member's response and may ask further information.
- The case is closed once the critical breach has been either downgraded to a minor non-conformance or closed, at the auditor's recommendation.
- The audit report is finalised and submitted to the RJC.
- If the critical breach case is not closed, **disciplinary action** may be considered against the member by the RJC Executive Committee, at the recommendation of the Executive Director.
- This can include an RJC written statement of objections to the member's conduct, the possibility for the member to submit a written response to the objections within 30 days, a final vote by the RJC Board of Directors on the proposed disciplinary action, such as temporary or permanent loss of RJC membership and an appeal right for the member.



8.2 2022 CRITICAL BREACH CASES

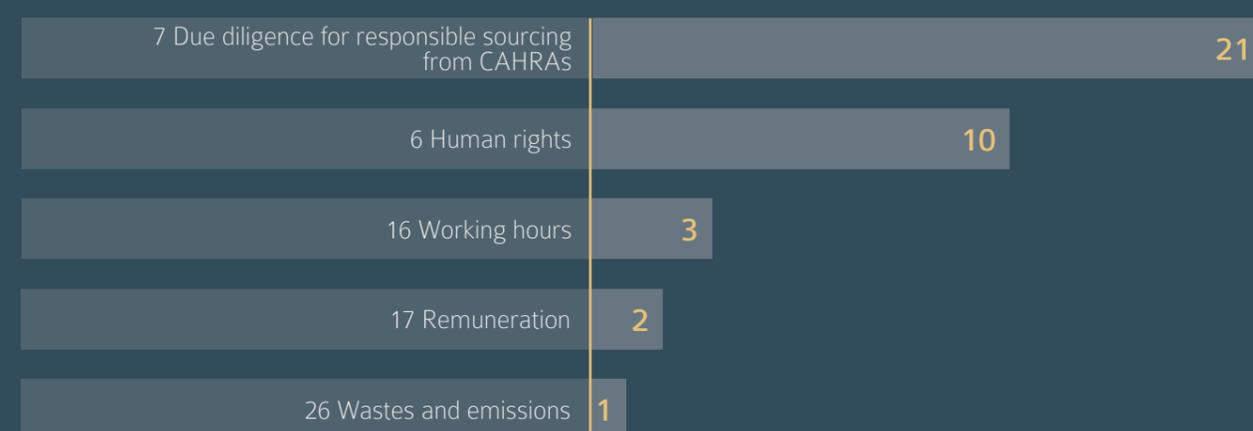
2022 Critical Breach cases per audit type



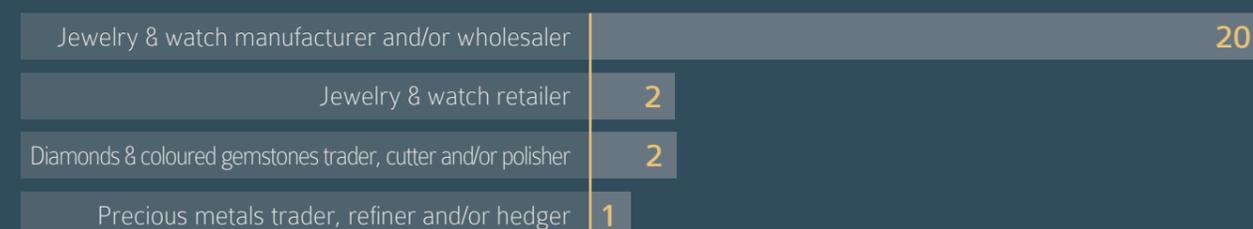
2022 Critical Breach cases per country



2022 Critical Breach cases per COP provision



2022 Critical Breach cases per Member forum



In 2022 there were **25 cases of COP critical breach** identified (compared to 26 cases in 2021). **USA and Thailand** remain in top 3 member countries with critical breach cases, as in 2021, with USA leading.

In 2022, we have continued our targeted member support for critical breaches, which consists of reaching out to the member immediately after critical breach identification. We would take this opportunity to explain the process, indicate the resources available on the RJC website and any upcoming relevant member training webinar, and offer bespoke support from the RJC Member Training team, while the member is working to address the issues. Communication and follow-up on member progress is maintained at all times.

8.3 MEMBER SUSPENSIONS

Member suspension refers to the removal of the member's profile page from our website under certain conditions:

- The member is subject to disciplinary proceedings as per the RJC Assessment Manual (such as, but not limited to, the member having a Critical Breach raised against them at their latest audit).
- The member has reached a Code of Practices (COP) audit deadline (first certification, re-certification, mid-term review) or a Chain of Custody (CoC) audit deadline (first certification, re-certification, surveillance), but failed to complete the audit or to provide a booked audit date as a minimum. If the audit deadline refers only to the CoC, the member page will remain visible, but will only show the COP certificate(s), while the relevant CoC section will be hidden.
- The member has reached their audit deadline, but the audit and the audit report have not been completed and submitted during the subsequent 12 months. Should the audit and audit report be completed after 12 months from audit deadline, the member's profile page will be reinstated only when their new certificate is issued.
- The member fails to make any payment of membership fees within a maximum of 3 months from the invoice due date. Membership can also be resigned for non-payment of the membership fee in such cases.

Asian Star Company
Jaykant Rathod
BPP / RJC
Coordinator

“ RJC helps to do the business ethically, to be legally compliant, to do the business in organised manner, to improve the working condition, welfare mechanism, occupational Health & Safety, Human Rights, etc., start evaluating business & social risk.”

8.4 COMPLAINTS

8.4.1 Summary of the RJC Complaints Mechanism

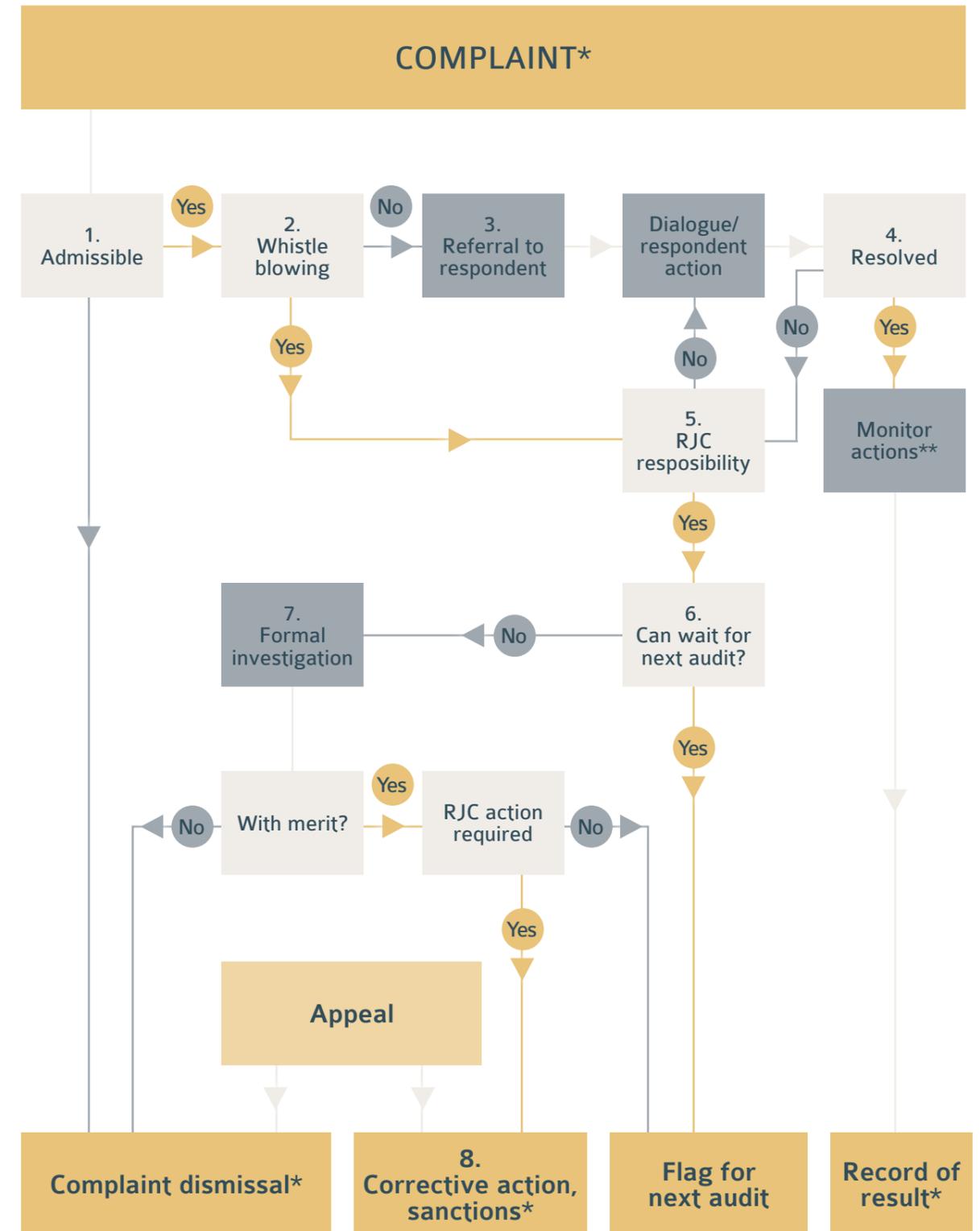
Who can complain? RJC Members and/or their employees, audit firms or auditors, third parties with a material interest in the member certification.

When can they complain? Within one year of the incident.

How to make a complaint? By completing the RJC Complaint Form and submitting it to the RJC together with supporting evidence. This includes credible information, records, observations, personal knowledge and/or statements of fact.

1. For a complaint to be admissible it must fall within the scope of the RJC Complaints Mechanism, which relates to (potential) non-conformances with the RJC's certification or assurance systems, or with its conduct in relation to governance and policies.
2. Whistleblowing complaints can be submitted anonymously to the RJC by telephone, email or letter.
3. Whistleblowing situations exempt, the RJC will facilitate and encourage a dialogue between the complainant and the respondent.
4. Complaints may be resolved through the dialogue process itself, as a form of early-stage resolution. Should that not be the case, the complaint will be referred back to the RJC for further formal processes to progress resolution of the complaint.
5. The RJC may take further action on unresolved complaints that relate to areas of RJC responsibility (Auditor or audit firm, RJC membership, RJC certification).
6. The RJC will define the next steps (flag issue for next audit, define corrective actions, trigger disciplinary proceedings or an ad-hoc investigation etc.)
7. Where triggered, a formal investigation means that a complaints panel is appointed, consisting of RJC staff and an independent third party, to conduct the investigation and report on the outcome and proposed actions to the RJC's Executive Director.
8. Depending on the outcome of the investigation report, the complaint is dismissed or upheld. In the latter case, the report will recommend corrective actions, suspension or withdrawal of RJC certification, temporary or permanent loss of RJC membership, suspension or withdrawal of approval for auditors and/or audit firms or it will require a further audit to investigate and/or follow-up on corrective actions.
9. Members, audit firms and auditors have the right to appeal loss of RJC membership or auditor approval within three months of notification of the relevant decision. Appeals will be heard via reconsideration of the complaint in formal investigation process under a different panel.

RJC COMPLAINTS MECHANISM



* All complaints and outcomes to be logged.

** If appropriate

8.5 COMPLAINTS IN 2022

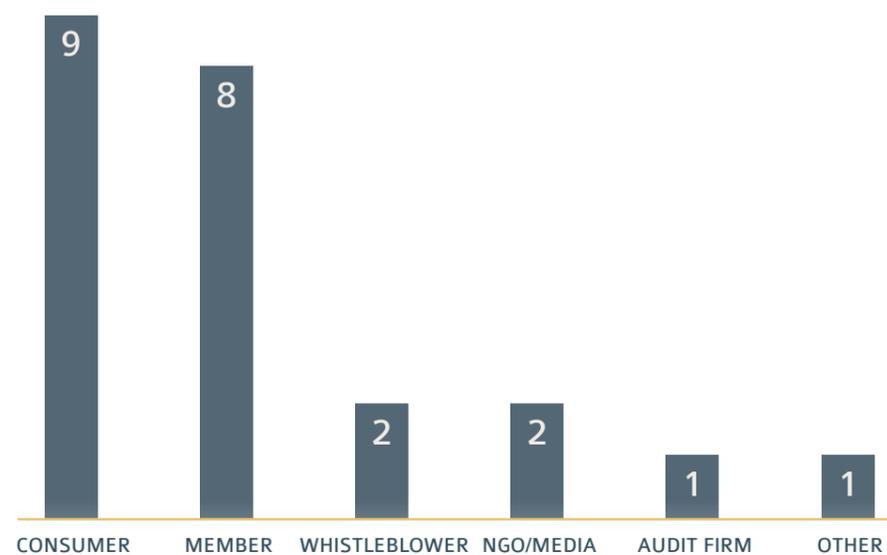
There was over a threefold increase of complaints in 2022 (23) compared to 2021 (7). However, more consumer complaints (related to product quality) were received that sit outside the scope of the RJC Complaints Mechanism.

Total number of complaints
23

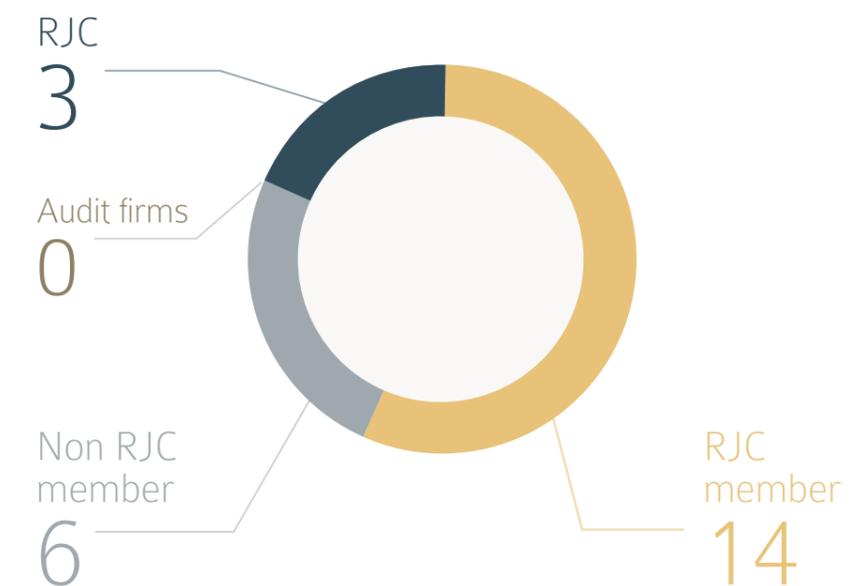
2022 Complaints category



2022 Complaints per complainant type



2022 Complaints per respondent type



2022 Complaints per member forum



2022 Complaints per action taken



8.6 REMOTE AUDITS

Introduced as a response to the COVID 19 pandemic and the difficulties of conducting on-site audits, remote audits have continued in 2022. Fully remote audits (desktop, virtual/mobile) and partially remote audits (also known as hybrid, facilitated or semi-remote audits) were deployed as alternative or complementary verification mechanisms, alongside conventional in-person onsite audit.

In 2022, there were 39% fewer remote audits (87) compared to 2021 (142). An additional 4 remote audit requests were rejected for not fulfilling the eligibility criteria (compared to 3 in 2021) and 3 were cancelled, with the audit being conducted onsite

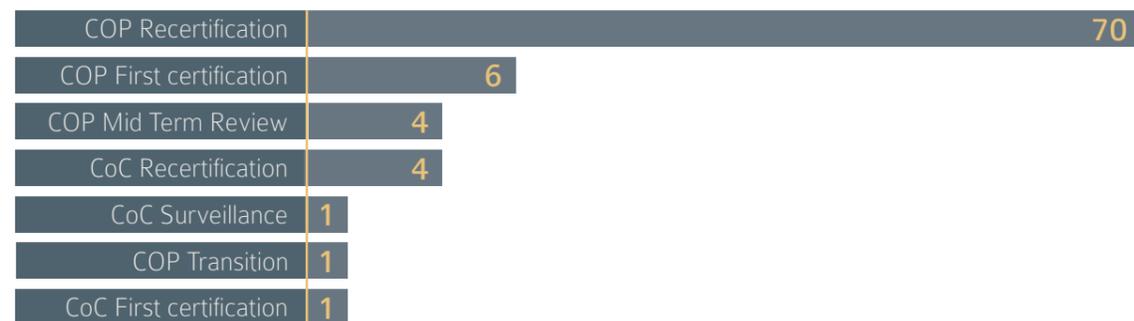
Remote audits in 2022

87

2022 remote audits per remote audit type



2022 Remote audits approved per RJC audit type



2022 Remote audits approved per member forum type



8.7 AUDITOR SCOPE

At the end of 2022, we had 153 approved auditors across the 13 RJC audit firms that can be found on the RJC dedicated webpage. 81 of them can conduct audits against both the Code of Practices and the Chain of Custody standards, while 71 auditors can cover the former and 1 other can cover the latter only. In 2022, 23 new auditors applied for approval and 39 already approved auditors expanded their scope. All the auditors are required to complete RJC training modules and can only conduct audits after they have successfully passed the associated assessments. One auditor can audit members in multiple countries (auditing geographical scope), depending on their experience, but will have only one country as place of residence.

Number of approved auditors

SGS United Kingdom Ltd	63
Bureau Veritas Italia	19
International Associates Ltd	10
Mazars	10
Intertek Italia Spa	8
Ernst & Young Associes (France)	7
Figurad Bedrijfsrevisoren BVBA	7
RCS Global Ltd	6
SCS Global Services	6
QIMA (formerly Asia Inspection)	6
ISOQAR (India) Pvt. Ltd	6
KPMG Cert GmbH	4
BSI Group	1

Top 6 countries with over 10 local auditors



The top 6 countries make up over 50% of the total number of auditors, per place of residence.



Countries covered by over 10 auditors per geographical scope

USA	28
India	27
France	27
Switzerland	26
China	25
Belgium	25
United Kingdom	22
Hong Kong	21
Italy	19
Thailand	16
Germany	15
United Arab Emirates	13
Spain	12

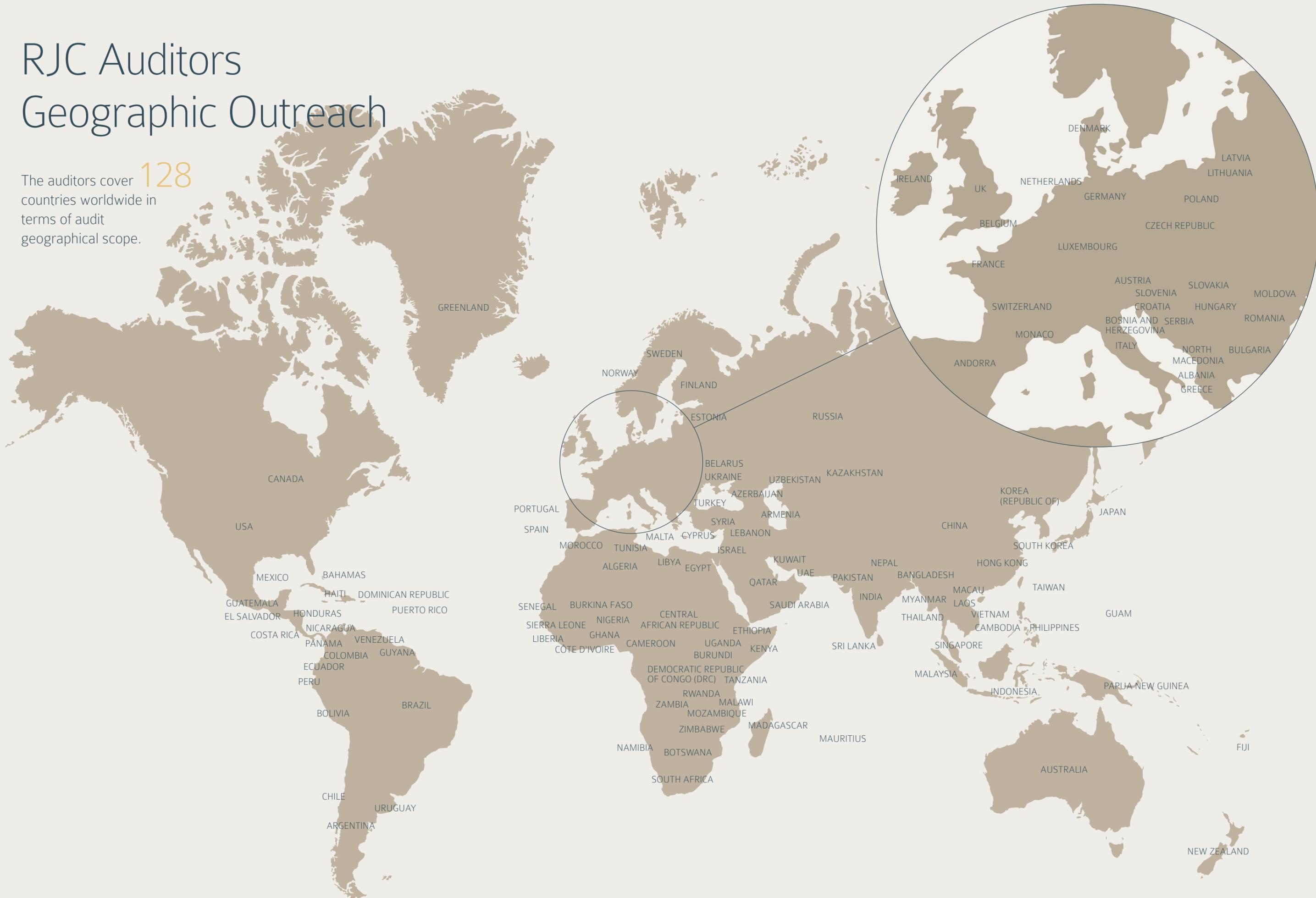
RJC Approved auditors per fora*

Jewelry and watch manufacturing or wholesale	146
Jewelry and watch retailer	142
Service and support industries	123
Diamond and coloured gemstones trading	107
Diamond and coloured gemstones cutting or polishing	94
Precious metals hedging or trading	77
Precious metals processing and refining	61
Precious metals mining	16
Diamond and coloured gemstones mining	14

* One auditor will usually cover multiple fora.

RJC Auditors Geographic Outreach

The auditors cover **128**
countries worldwide in
terms of audit
geographical scope.



8.8. ASSURANCE PROJECTS

RJC participated in two ISEAL projects that were finalised in 2022. Both projects were funded by the Swiss State Secretariat for Economic Affairs SECO, through the ISEAL Innovations Fund.

The first project, started in 2021, **Assessing learning in due diligence and grievance mechanisms**, was a collaboration with Bonsucro (project lead), with the aim to share learning and good practice with other voluntary sustainability schemes (VSS) on due diligence and grievance mechanisms.

The project has advanced understanding of the role that multi-stakeholder initiatives have in supporting the implementation on the UN Guiding Principles on Business and Human Rights (UNGPs), capturing key recommendations as well as identifying the main challenges for effective human rights due diligence integration and implementation. The project also created the opportunity to share and document good practice to strengthen grievance mechanisms and has illustrated how third-party partners can support sustainability systems in the design and implementation of grievance mechanisms.

The below project outputs are available on ISEAL's website:

- **Resource for Partnerships in Grievance Mechanisms** - Practical resource on how to successfully use third parties to support the design and implementation of grievance mechanisms for VSS and the private sector. The document also includes a framework on how to select a suitable third party.
- **Human Rights Due Diligence Briefing Note** - Research on learning and good practice from the experience of ISEAL Community Members in implementing human rights due diligence in line with the UNGPs.
- **Grievance Mechanisms Briefing Note** - Research into grievance mechanisms within selected VSS, namely how they have been set up and how grievances are managed and remediated within their memberships.

The second project, started in 2019, **Mining, minerals and metals partnership: Alignment** and collective action to drive improvement, was a collaboration with ResponsibleSteel (project lead), Initiative for Responsible Mining Assurance (IRMA) and Towards Sustainable Mining (MAC-TSM), under the umbrella of the **M3 Standards Partnership** aimed at developing and piloting practical solutions to increase cross-recognition and interoperability between the standards.

The mining, minerals, and metals sector features a highly diverse collection of industries with different supply-and-demand dynamics. Attempts to address its environmental and social impacts have spawned more than 150 voluntary sustainability standards to date. While each standard has its own distinct focus, which might be related to a specific issue, material, phase of production, or supply chain, their large number and diversity often result in diffusion and confusion as stakeholders attempt to relate them to their own work. Diffusion of effort and audit fatigue is commonly recognised as being a major barrier to the effectiveness of certification.

In recognising this challenge, the M3 Partnership seeks to minimise the duplication of effort, harmonise effective approaches to common issues, and provide a basis for purchasers, government, and civil society to align their support for certification and maximise uptake and impact as a result.

The below project outputs are available on both ISEAL's website and the M3 Partnership website:

- **An Integrated Assessment Protocol (IAP)** tool designed to allow mine sites to be assessed against multiple site-level standards in a single audit, supporting identification of alignment across standards, and promoting demonstration of conformity with multiple standards with greater efficiency and reduced cost. The IAP assessment criteria were developed by mapping the requirements of IRMA, RJC, and TSM against a detailed set of themes and subthemes. The tool was refined through one pilot conducted with an Anglo American Platinum Group Metals mine in South Africa and a second pilot conducted with ArcelorMittal Mining Canada, with the associated **IAP Pilots: Case Studies and Lessons Learned**.
- **Cross-sectoral learning from the M3 Standards Partnership, GHG Project Report, Use of Voluntary Sustainability Initiatives in the Mining Sector to Demonstrate Due Diligence, Summary of Projects and Lessons Learned, ResponsibleSteel: Key Learnings from Recognition Process.**

An Interview with Assurance Services International (ASI)

ASI aims to bring sustainability intentions to life through partnerships with leading sustainability standards and initiatives. They are an independent assurance partner with global headquarters.

Q: Please briefly describe the work of ASI?

A: Our tailored services enable clients to maximise their social and environmental impact in many sectors such as agriculture, aquaculture, energy, forestry, mining among others. We have four main service lines: Assurance Oversight – in simple words “auditing the auditors” (which we provide to the RJC), Assurance System and Development, System Integrity & Risk Management, and Knowledge Sharing.

Q: What is an Assurance Oversight and what is the purpose of conducting this?

A: Oversight simply means an assessment of Audits Firms/Certifiers demonstration of competence. It means that through a variety of assessment types, we monitor and evaluate RJC approved audit firms’ competence using a risk-based approach. In essence, we oversee the performance of audit firms to ensure that the RJC’s standards are applied consistently, follows best auditing practices, and leads to correct outcomes.

Q: What types of assessment does ASI do on the RJC’s audit firms?

A: We do three types of assessments: Head Office, Witness, and Desk Reviews. A Head Office assessment will typically involve the audit firm’s RJC program manager and quality manager and will focus on how well the audit firm has integrated and applied the RJC requirements into their operations as well as their quality management system. It is usually done remotely but can also be done onsite. A Witness Assessment involves ASI observing an RJC CoP or CoC audit to determine how well the audit has been performed by the auditor or audit team. It involves ASI following the audit as observers from start to finish. A Desk Review involves verifying audit firm documentation, such as part of their quality management system, and can be specific to a topic or general.

Our assessment types have slightly different goals, but all have the overall aim of verifying audit firm compliance to RJC requirements.



Anne Nistad

Q: What is the typical structure for an oversight assessment?

A: An oversight assessment is in many ways no different to any other audit and will follow best auditing practices and principles as set out in the ISO standards. It will involve planning the assessment with the audit firm (i.e., confirming the type, scope, team members, dates, location, length, etc.), scheduling the opening and closing meetings, providing draft findings to the audit firm, and producing the final assessment report. Thereafter, the audit firm and ASI keep in touch when non-conformities have been raised which need to be addressed and eventually closed. The follow-up of these non-conformities is done through ASI’s dedicated IT platform called ASI Connect, which audit firms have access to.

Q: What evolution have you seen year to year on RJC’s auditor performance?

A: From my experience interacting with RJC auditors, I have found them to be committed, knowledgeable and hard-working, often needing to work with tight deadlines and at times, in difficult environments. It has also been very rewarding to see the number of non-conformities we raise to audit firms through our assessments decrease over time. For example, in 2017 when we first started working with RJC, we issued 17 major non-conformities to audit firms. However, fast forward to 2022, and we only issued 1 that year (and none in 2021). This is indicative of improved audit firm performance and therefore better audits to confirm that RJC members adhere to the high ethical, human rights, social and environmental practices set by the RJC.

Q: How has ASI collaborated with the RJC?

A: RJC first appointed ASI as its oversight provider back in 2017 and we have been collaborating ever since. The RJC’s Assurance team is our main point of contact and together we develop yearly oversight plans where ASI assesses audit firms and provides a recommendation to the RJC as to whether the audit firm’s RJC approval status should be granted, maintained, or suspended.

Although we are independent from the RJC, we collaborate and exchange insights and data with the common goal of ensuring that RJC CoP and CoC audits are implemented with rigor and consistency, in order to maintain the credibility of the RJC as the leading standards body in the global sustainable watch and jewellery supply chain.

We look forward to continuing our collaboration in the years to come and to support the RJC’s mission.

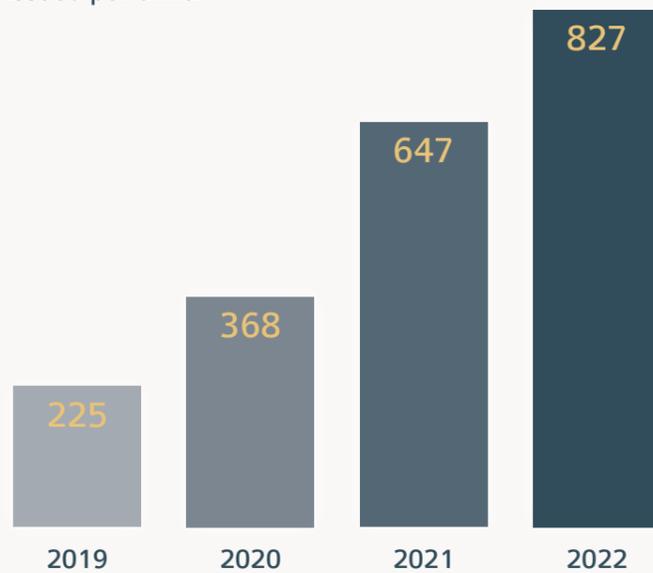
Certification

The role of the Certification Department is to issue certificates after reviewing audit reports for consistency, quality, completeness. The department supports members with re-certification and audit scope queries.

9.1 GROWTH OF RJC CERTIFIED MEMBERS

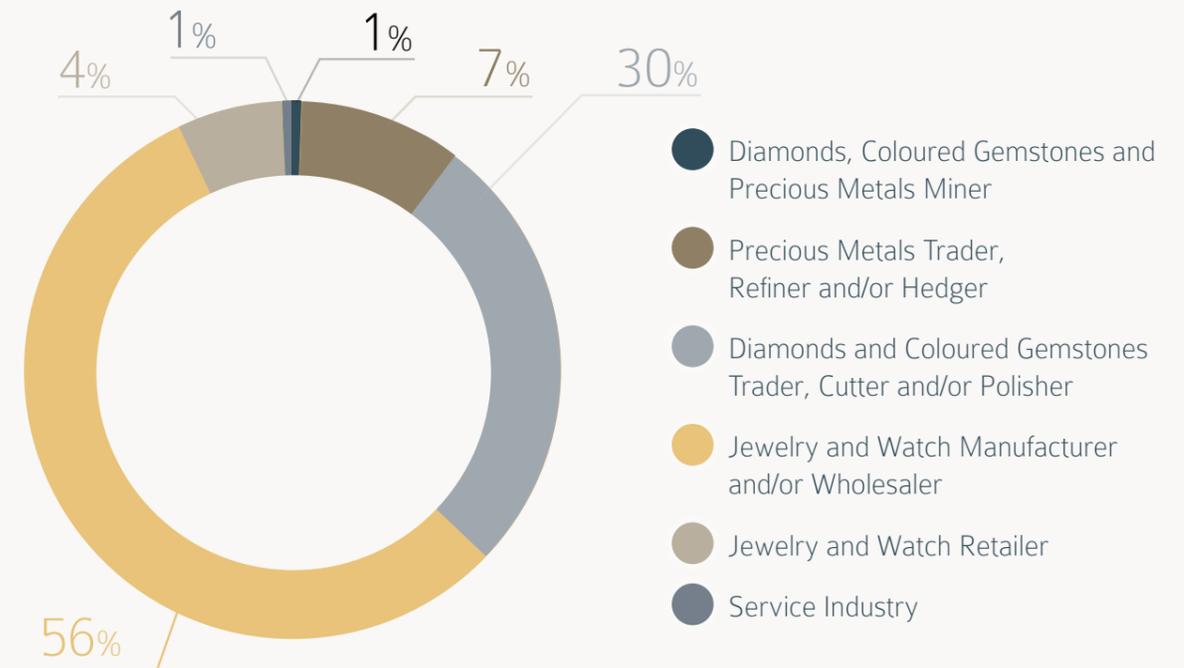
As a result of the RJC's growing member count, the number of audit reports submitted to the RJC has increased by 30% from 2021 to 2022. Through streamlining, the RJC Certification team kept up with the increased pace and the total number of certificates issued increased by 28% from 2021 to 2022. Several new milestones were hit in 2022, while working closely with the RJC Assurance and Digital teams with the aim of continued digitising and streamlining.

COP and CoC Certificates issued per annum



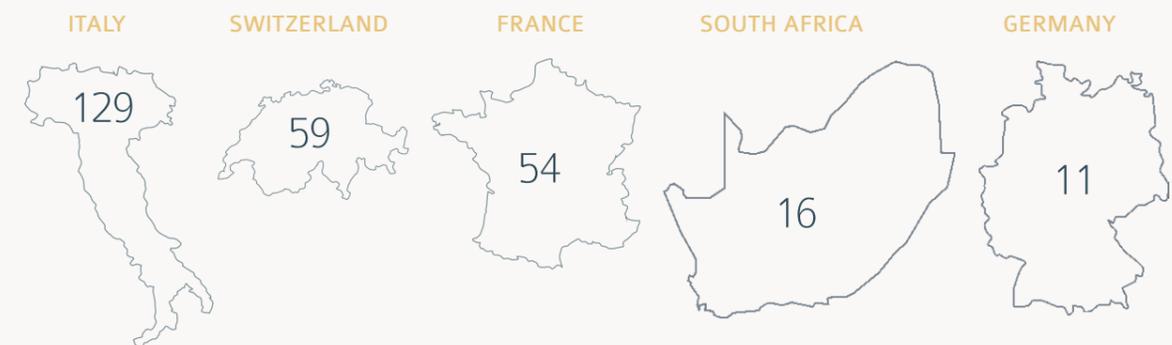
The number of Code of Practices (COP) certified members has grown steadily from 849 at year end 2019 to 1,099 at year end 2022. Of these certificates, more than 20% include a provenance claim.

COP certified members by forum Year End 2022



The adoption of the voluntary Chain of Custody (CoC) standard has accelerated in recent years with the number of CoC certified members almost doubling from 148 at year end 2019 to 290 at year end 2022. The trend of jewellery and watch manufacturers and/or wholesalers adopting the standard has continued. The proportion of CoC certified members with this forum type increased from 61% of in 2020 to 71% as of end of 2022. 91% of CoC certified member HQs are in the following top 5 countries: Italy, Switzerland, France, South Africa, Germany.

Top 5 countries for CoC certified member HQs, representing 91% of CoC certified members

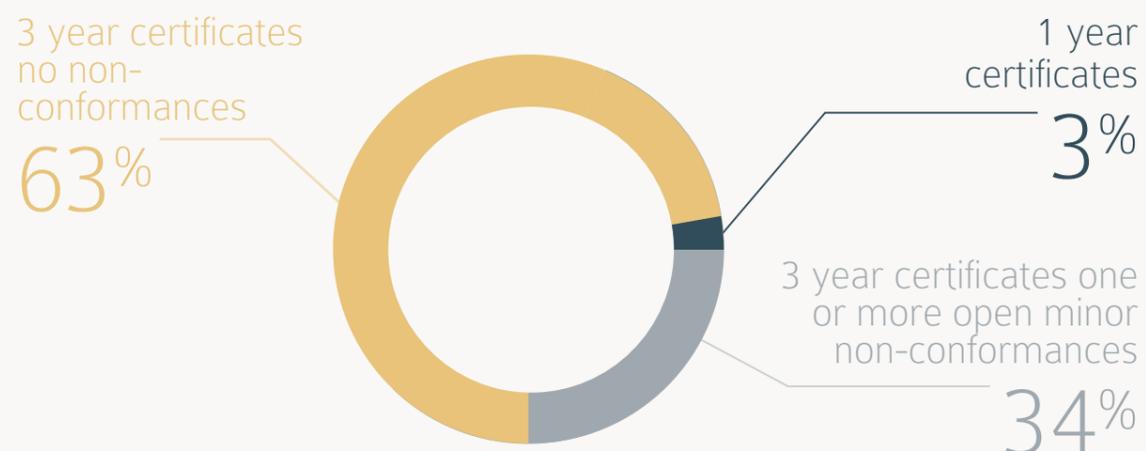


9.2 CODE OF PRACTICES (COP) CERTIFICATES ISSUED IN 2022

As a result of continued membership growth, the total number of COP certificates issued grew from 500 in 2021 to 634 in 2022. 69% of COP audits were either re-certification audits, mid-term review, 1-to-3-year transition, change or extension to scope or provenance claim bolt-on audits, compared to 31% of first COP audits. This demonstrates a strong continued commitment from our recertifying members. Only 6% of reports submitted were against the COP 2013 version, which is being phased out.

RJC COP certified members can have up to 9 materials in scope. Of the COP certificates issued in 2022, more than 70% had diamonds and gold in scope. Next, platinum was in scope for 40%. The three coloured gemstones (rubies, sapphires, and emeralds) which were added to the COP in 2019, were each in scope for 35% of certificates, similar to silver. Finally, palladium and rhodium were in scope in about a quarter of certificates.

COP certificates issued in 2022

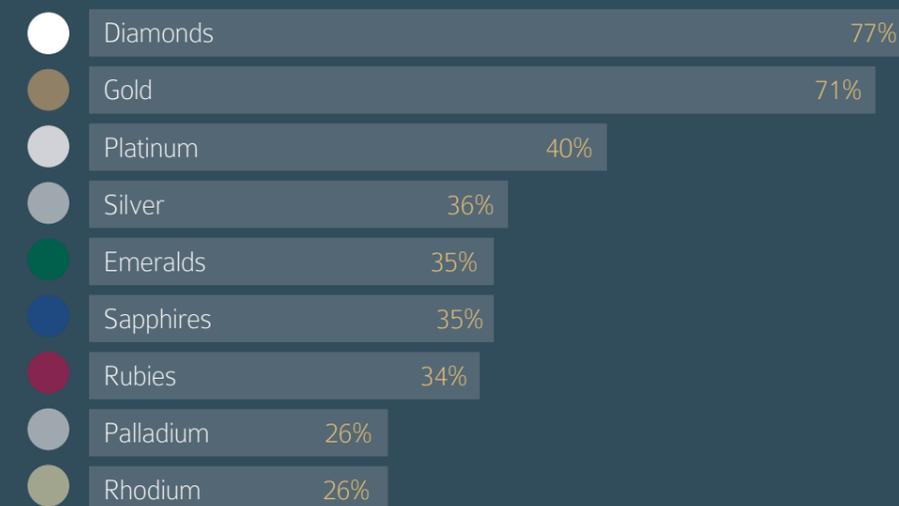


Implementation of provisions

Of the COP certificates issued in 2022, 37% had open non-conformances. Non-conformances were found most often against provisions 6, 7, 12, 28 and 29 (for manufacturers, wholesalers, retailers), and against provision 23 (for all forum types). The RJC Assessment Manual requires that all non-conformances are closed by the next certification audit. Please refer to the RJC website for a range of support resources.

If the auditor identifies an open major non-conformance, then the member is recommended a 1-year certification. Out of all certificates issued in 2022, 3% were valid for 1 year and 97% were valid for 3 years. The country with the most 1-year certificates was the same as in 2021, namely the USA.

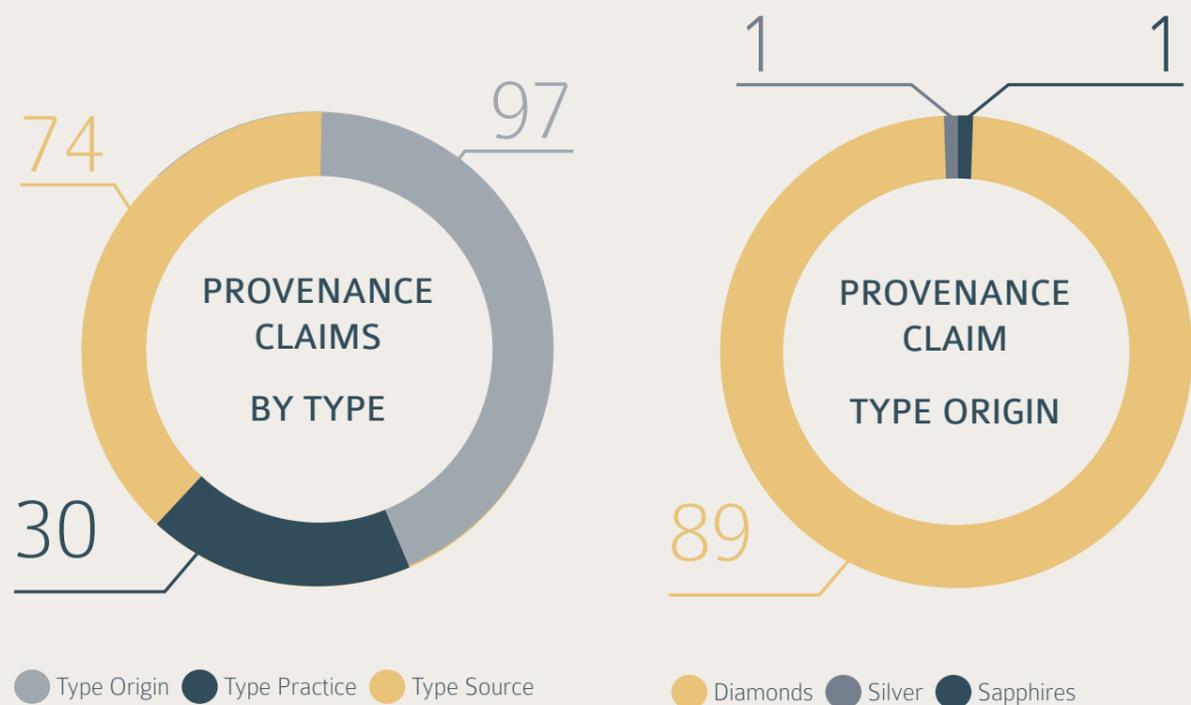
Materials in scope across 2022 COP certificates (%)



Common non-conformance provisions in 2022, by member performance type

	COP 6	COP 7	COP 12
Jewellery and Watch Manufacturer and/or Wholesaler	14%	27%	13%
Jewellery and Watch Retailer	22%	35%	26%

	COP 23
Diamonds and Coloured Gemstones Trader, Cutter and/or Polisher	17%
Diamonds, Coloured Gemstones and Precious Metals Miner	67%
Jewellery and Watch Manufacturer and/or Wholesaler	31%
Jewellery and Watch Retailer	48%
Precious Metals Trader, Refiner and/or Hedger	31%
Service Industries	38%



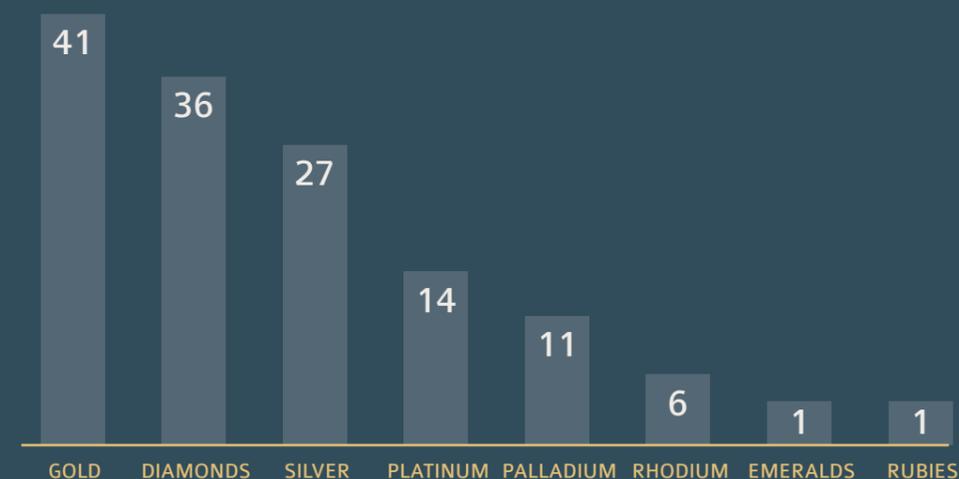
Provenance Claims

COP provision 14 allows members that make claims about the provenance of materials (source, origin or practices used when sourcing), to have these audited as part of their RJC COP audit. Members can have one or multiple provenance claims audited of one or more type (origin, source, or practice). The COP covers four main, but not exhaustive or mutually exclusive, scenarios for making provenance claims, for when a business:

- traces material back through the supply chain to its origin;
- verifies the sources or practices related to the material, for example, sourcing recycled material;
- sources material from certified suppliers, for example buying Fairmined or Fairtrade gold; and
- scrutinises materials or sourcing in another way going above and beyond the COP

Of the 2022 COP certificates, close to a quarter included one or more provenance claims, a small increase from 22% in 2021. Of these certificates with one or more claim, 65% of certificates included a type origin claim, 50% included a type source claim, and 20% a type practice claim. This does not add up to 100% as members can make more than one claim per certificate.

Provenance claim - type source

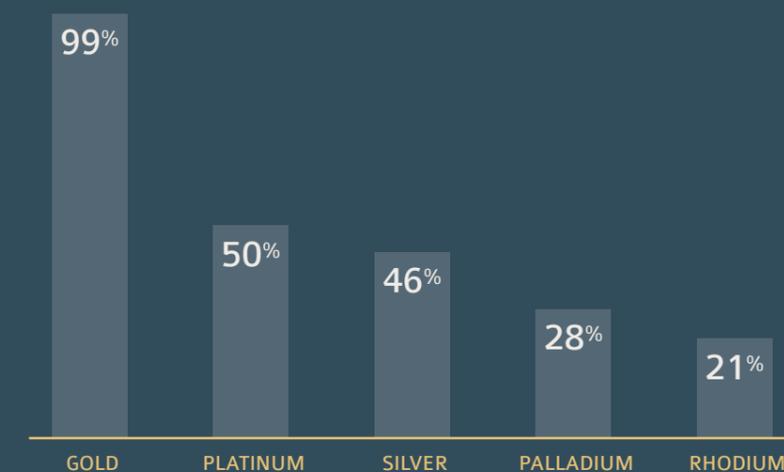


9.3 CHAIN OF CUSTODY (COC) CERTIFICATES ISSUED IN 2022

The number of CoC certificates issued in 2022 grew by 20% from 2021, showcasing increasing uptake of the voluntary standard among RJC members. CoC gold continues to be the most common CoC material followed by platinum and silver, each featuring in nearly 50% of certificates issued in 2022, then palladium (28%) and finally rhodium (21%).

About half of the members having been issued a CoC certificate in 2022 had a CoC scope beyond their own entity, extending to outsourced contractors handling the materials. A lower percentage of open non-conformances was identified, of only 18%, compared to the number of open non-conformances among COP certificates issued.

Materials in scope across 2022 CoC certificates (%)



Eligible material declarations

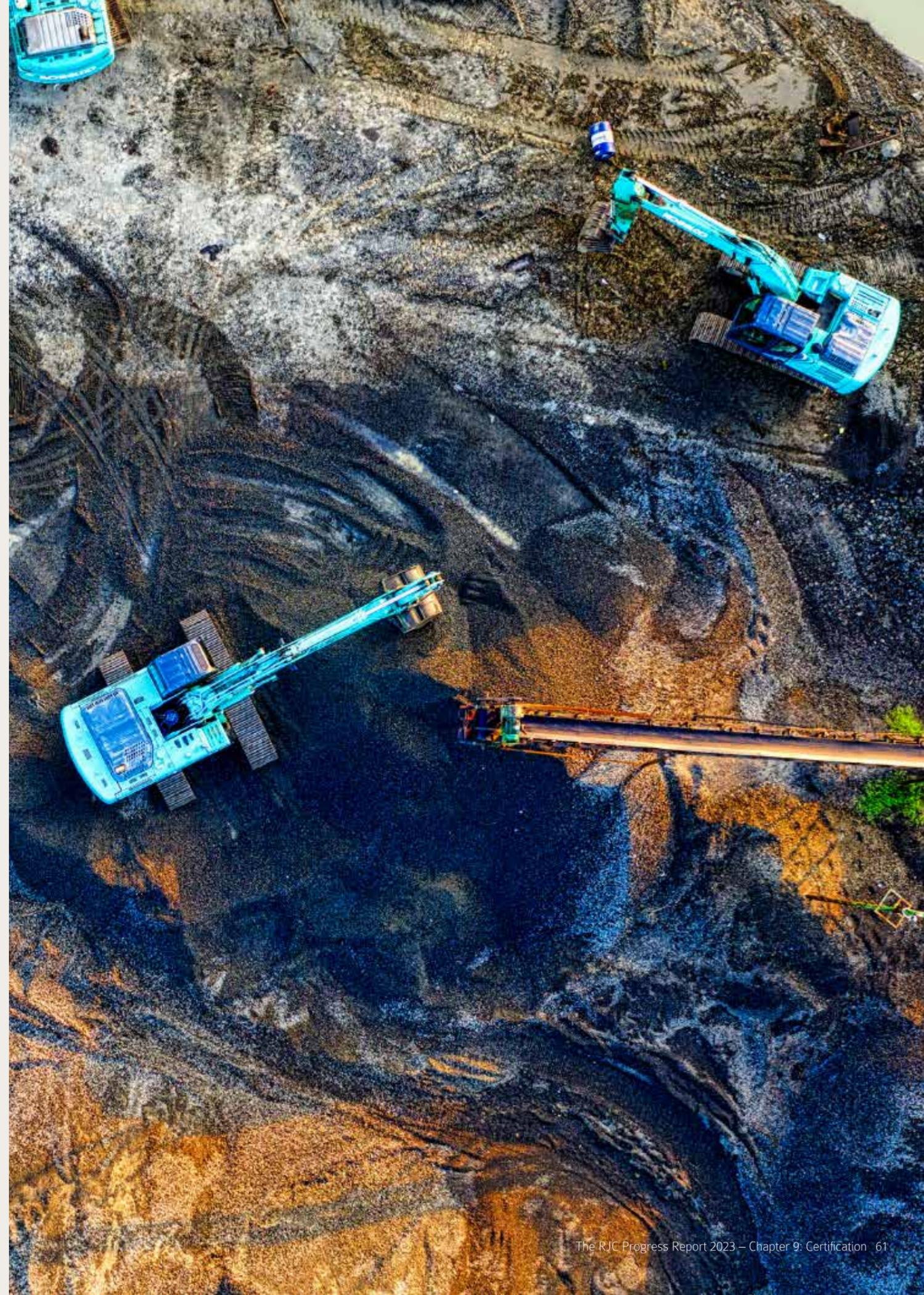
A Chain of Custody begins with an eligible material declaration that is made by a CoC certified entity in a CoC transfer document. For example, this could be a refiner which refines and then sells recycled gold. If the refiner sells both recycled gold and grandfathered gold, for example, then a member can make several eligible material declarations. Materials are eligible to be Grandfathered under the RJC CoC Standard if they have a date before January 1, 2012 permanently attached, or verifiable by refinery or bullion bank records.

An eligible material declaration shows the recipient that the material in question meets the requirements of the RJC CoC Standard. It forms the basis for all subsequent proofs of eligibility in the supply chain.

Eligible material includes gold, silver, or platinum group metals (PGM) that are:

- Mined as defined by provision **6**
- Recycled as defined by provision **7**
- Grandfathered as defined by provision **8**
- A mix of the above, each meeting the relevant eligibility criteria

The most common eligible material declaration in 2022 was recycled and the least common was mined.



Impacts

The role of the Impacts department is to establish credible impact measurement, and to facilitate ESG literacy amongst RJC members.

Credible impact measurement is established through full compliance with the ISEAL Impacts Code, the collation of data driven insights on RJC members for trend analysis and annual reporting, and through engagement with the SDG Taskforce. Facilitating ESG literacy is achieved through equipping members with information and knowledge on ESG reporting requirements through the delivery of toolkits, guidance, and training.

10.1 ISEAL IMPACTS CODE

The ISEAL Code of Good Practice for Assessing the Impacts of Social and Environmental Standards Systems (Impacts Code) supports the RJC in measuring the results of our standards to ensure that we are delivering the desired impact through the development of a robust monitoring and evaluation system. The RJC was independently evaluated by ISEAL against the Impacts Code in 2022. The Impacts Code is comprised of several clauses, but two key projects associated with compliance requirements are:

- o Annual Impact Evaluation
- o Theory of Change (ToC) “2030 Roadmap”

10.1.1 Annual Impact Evaluation

As part of our performance monitoring, we undertake in-depth evaluations in collaboration with strategic partners, to provide a deeper and/or broader perspective of our impact and progress. The objective of an impact evaluation is to provide insight into whether we are meeting the long-term outcomes outlined in the 2030 Roadmap.

The long-term impacts outlined in the 2030 Roadmap focus on the 5 priority SDGs. Therefore, we have developed a 5-year research schedule allowing a full coverage of our intended impacts (focusing on one SDG per annum).

The RJC’s 2022/2023 evaluation is on SDG 5 Gender Equality within the watch and jewellery supply chain. In September 2022 RJC put out a call for proposal to invite research teams to work with us on this project. Our chosen research partner was **Dr Lynda Lawson** from the Sustainable Minerals Institute at the University of Queensland (UQ), Australia. Dr Lynda has extensive knowledge and experience of examining gender equality within gemstone value chains, having recently written a paper on women in Thailand’s gem and jewellery industry and the SDGs. Her PhD was an in-depth study of the opportunities for women in gemstone supply chains from Madagascar to Thailand.

The RJC integrated a gender lens to various provisions of the 2019 COP update, as well as launching several initiatives to raise awareness and prompt action to address gender inequalities through workshops, webinars, and toolkits. Together with UQ, the RJC are investigating to what extent the 2019 COP update and supporting initiatives, resulted in meaningful change in certified members.

Research on SDG 5 commenced in December 2022 with the launch of a survey for certified members, which received 55 responses. Members were then invited to participate in interviews with Dr Lynda Lawson. The full results of this research will be launched in Q2 2023.

10.1.2 Theory of Change “2030 Roadmap”

The Theory of Change (ToC) is a compliance requirement for the ISEAL Impacts Code. This is a comprehensive description of an organisations desired long-term goals, and a clear framework for how they intend to get there.

The first iteration of the RJC’s ToC, also known as the 2030 Roadmap, was launched in 2020. It articulates how the RJC aims to arrive at the 2030 Agenda through a range of short, medium, and long-term outcomes. It identifies 5 priority SDGs for the industry, what actions members can take to embed the SDGs into their business, and it is accompanied with a set of voluntary compliance metrics that members can use to measure progress.

D’Or Joiers
Marc Lopez Perez
Head of Business
Development

“ Belonging to the RJC environment, as well as implementing and certifying the CoP and CoC standards, has significantly helped us respond to the latest changes and growing ESG requirements applicable in the jewelry sector where we carry out our activities.”

Once the 2030 Roadmap was developed, it was put out for 3 months of public consultation to give RJC members and stakeholders the opportunity to provide feedback. During this time, we had direct engagement with over 150 stakeholders.

In addition to this, the metrics were piloted with a group of 30 members and 2 auditors. The purpose of the pilot was to assess whether the metrics could be applied to members of all sizes from across the supply chain.

With input from the SDG Taskforce, the 2030 Roadmap was updated with all stakeholder feedback, and submitted to ISEAL as part of the latest audit.

10.2 PERFORMANCE MONITORING

Performance monitoring is a key component of our Monitoring & Evaluation (M&E) system. It focuses on systematic collection and analysis of data from our members throughout their certification journey, to enable us to evaluate whether the desired outcomes outlined in the 2030 Roadmap are being achieved. As per ISEAL guidance, the RJC has defined the indicators for performance monitoring that will provide the data necessary to measure our progress and to monitor any unintended effects. The indicators being used to track performance has been made publicly available under the RJC's Indicator Protocol.

Once a year, the RJC compiles and analyses the data retrieved from each of the indicators listed in the Indicator Protocol, and reports in the results observed through performance monitoring in an internal report. The internal report is shared with the RJC management team and the learnings are used to create an action plan to ensure that the results of performance monitoring are used to improve the effectiveness of our standards.

The RJC has strict protocols to help ensure the quality, reliability and accuracy of data used for performance monitoring. We follow a data governance framework which outlines data management procedures for processes such as data creation, data storage, data use and data sharing.

10.3 FACILITATING ESG LITERACY

The RJC endeavours to support its large and/or publicly listed members to understand the regulatory requirements that impact their business, and to support its SMEs and/or non-publicly listed members to understand the B2B requirements that impact their business.

We issued an ESG member survey to understand which topic areas would be of most value to our members as we developed our toolkits, guidance, training, and support. Members were asked to rate which topic areas were of most/least value to them.



The topics voted by RJC members as being of greatest value were - an explanation of the relevance of ESG to SMEs, a description of the tools and resources that RJC offer for support on ESG reporting, an explanation of the importance of ESG, and an explanation of how global reporting frameworks link to the COP. The least valuable topic area was an explanation of the relevance of ESG to large companies.

Members were also asked to complete the following sentence to provide feedback on what would be of most value to their specific businesses. The most frequently cited responses are listed below:

It would be helpful to me if the tools and resources provided by the RJC on ESG addressed the following...

- How ESG regulations and RJC requirements effect my business.
- An explanation of how global reporting frameworks link to the Code of Practices (COP).
- How to implement ESG properly in accordance with the COP 2019.
- A guideline for developing an ESG strategy/strong ESG program for small and medium sized enterprises.
- Business carbon footprint calculations and Net Zero strategies.
- Suggestions and KPIs for continual periodic improvements, such as quarterly or semi-annually.

The crucial learnings from this exercise, and subsequent feedback from the SDG Taskforce, have been applied to the RJC's upcoming ESG Toolkit for launch in Q2 2023. It is clear where the demand lies. The RJC membership is made up of multiple business models. The measure of success is one singular framework that meets the needs of all.



An Interview with ISEAL

ISEAL supports ambitious sustainability systems and their partners to tackle the world's most pressing challenges. RJC is a Code Compliant member of ISEAL.

Q: What is the ISEAL Impacts Code of Good Practice?

A: The ISEAL Code of Good Practice for Assessing the Impacts of Social and Environmental Standards Systems (Impacts Code) supports standards systems to measure and improve the results of their work and to ensure that standards are delivering the desired impact.

Q: What criteria must an organisation fulfil to be compliant with the Impacts Code?

A: The Impacts Code has almost 50 requirements and is organised across five chapters: monitoring and evaluation, system requirements, stakeholder engagement in M&E system design, defining the intended change, and learning and improving. Each 4 years, ISEAL Code Compliant organisations need to submit evidence that demonstrates they meet the requirements, which are evaluated independently and in accordance with ISEAL's Independent Evaluation Procedure.

Q: How does the Impacts Code differ from the Standards and Assurance Codes?

A: There are common areas across all three Codes, such as data management and stakeholder engagement. However, the Impacts Code is specifically designed to identify good practice that supports organisations to understand the effectiveness of their system against the change that it intends to make.



Q: How does compliance with the Impacts Code help organisations to achieve their sustainability ambitions?

A: Being ISEAL Code Compliant helps organisations to understand and improve their systems to ensure that they are rigorous, transparent and effective. The Impacts Code is key to ensuring organisations are monitoring the effectiveness of their system, understanding where improvements can be made and using this information to inform system developments.

Q: What is a 'Theory of Change' and why is this a compliance requirement of the Impacts Code?

A: In simple terms, a Theory of Change describes the overall change you want to make and then how you intend to get there. It describes the outcomes and the outputs that you are seeking to achieve and the strategies and tools that you use to deliver these. It also highlights any assumptions to your model for change and supports you to develop indicators to understand how your system is performing against its objectives.

Q: How can an organisation best communicate its impacts?

A: The Impacts Code asks for transparent and publicly available information on the impacts of the organisation's system. It also asks that the organisation engages its stakeholders in the development of its Theory of Change. This supports an effective Theory of Change, as well as helps the organisation to understand what outcomes and impacts are important for particular stakeholders, enabling the organisation to tailor its communication to its audience.

Post Audit Member Survey: 2022

Following receipt of a member’s audit report to the RJC, members were asked to provide feedback on the quality of the RJC’s member service and the audit, as well as the benefits realised as a result of their RJC certification. 84 responses were received in 2022:

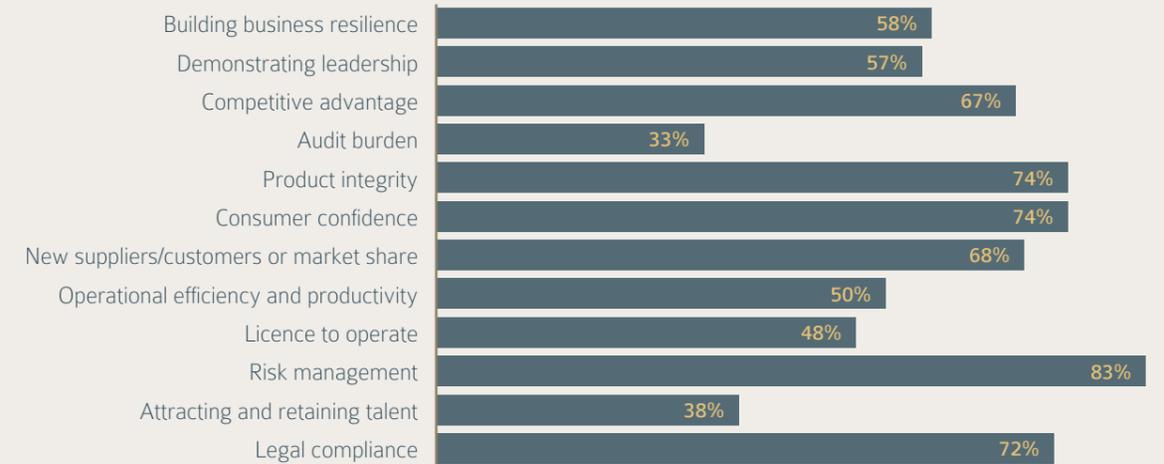
Member service rating: 4.3 out of 5



Members attributed COP provisions 2 and 7 as having contributed to the biggest improvement in their organisation’s performance:



Members highlighted the following key business benefits to becoming certified:



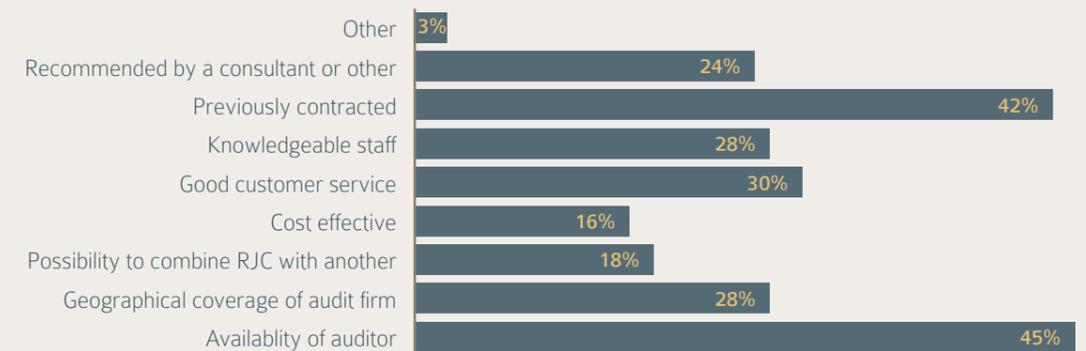
Members utilised the following RJC tools and communications and found them to be fit for purpose:



Members rated the overall audit process highly, with 98% of members reporting to be ‘very satisfied’ or ‘satisfied’ with the process:



Members noted auditor availability as the most popular reason for auditor selection:



GRI Content Index Table

Statement of use: The Responsible Jewellery Council has reported the information cited in this GRI content index for the period 1st January 2022 to 31st December 2022 with reference to the GRI Standards.

GRI used: GRI 1: Foundation 2021

GRI STANDARD	DISCLOSURE	LOCATION																																																																	
GRI 2: GENERAL DISCLOSURES 2021	2-1 ORGANIZATIONAL DETAILS	The RJC is a not-for-profit company incorporated under the UK Companies Act. As such, we are governed according to the requirements of UK law. Pages 18-19, 70"																																																																	
	2-2 ENTITIES INCLUDED IN THE ORGANIZATION'S SUSTAINABILITY REPORTING	The RJC is one entity, formally the Council for Responsible Jewellery Practices Limited. Trading as the RJC. It is a company incorporated in England and Wales under the UK Companies Act. The Annual Report & Financial Statement is filed with Companies House, the UK corporate register. It is produced by the RJC's independent auditors, approved by all Members directly through the AGM, and signed by the RJC Chair & Treasurer.																																																																	
	2-3 REPORTING PERIOD, FREQUENCY AND CONTACT POINT	The reporting period for this annual progress report covers the period 1st January 2022 to 31st December 2022. This report was published on 9th June 2023. The reporting period for our financial reporting is also the calendar year. For any questions about the report or reported information please contact the Impacts department: rjcimpacts@responsiblejewellery.com																																																																	
	2-4 RESTATEMENTS OF INFORMATION	The RJC has not made any restatements of information in the current reporting period.																																																																	
	2-5 EXTERNAL ASSURANCE	This is the RJC's second year reporting in reference to the GRI standards. As such, the RJC has taken the decision not to externally assure the 2023 progress report.																																																																	
	2-6 ACTIVITIES, VALUE CHAIN AND OTHER BUSINESS RELATIONSHIPS	This can be found on pages 70-71 of 2022's Annual Progress Report, available here: (https://www.responsiblejewellery.com/wp-content/uploads/RJC_Annual-Report_2022_V2.pdf)																																																																	
	2-7 EMPLOYEES	All RJC employees are based in the UK. A breakdown of employees by gender and employee type can be see below: Reporting Period: 1st January 2022 - 31st December 2022 <table border="1"> <thead> <tr> <th>Female</th> <th>Male</th> <th>Other</th> <th>Not Disclosed</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td colspan="5">Number of employees (head count)</td> </tr> <tr> <td>15</td> <td>2</td> <td></td> <td></td> <td>17</td> </tr> <tr> <td colspan="5">Number of permanent employees (head count)</td> </tr> <tr> <td>15</td> <td>2</td> <td></td> <td></td> <td>17</td> </tr> <tr> <td colspan="5">Number of temporary employees (head count)</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td colspan="5">Number of non-guaranteed hours employees (head count)</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td colspan="5">Number of full-time employees (head count)</td> </tr> <tr> <td>13</td> <td>2</td> <td></td> <td></td> <td>15</td> </tr> <tr> <td colspan="5">Number of part-time employees (head count)</td> </tr> <tr> <td>2</td> <td></td> <td></td> <td></td> <td>2</td> </tr> </tbody> </table> Calculated using head count methodology at the end of the reporting period."	Female	Male	Other	Not Disclosed	Total	Number of employees (head count)					15	2			17	Number of permanent employees (head count)					15	2			17	Number of temporary employees (head count)										Number of non-guaranteed hours employees (head count)										Number of full-time employees (head count)					13	2			15	Number of part-time employees (head count)					2				2
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Number of part-time employees (head count)																																																																			
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2-8 WORKERS WHO ARE NOT EMPLOYEES	The RJC employes 5 contractual consultants. The type of work they perform includes strategic advisory, membership engagement, business development, communications and marketing. This number was calculated using head count methodology at the end of the reporting period.																																																																		

GRI STANDARD	DISCLOSURE	LOCATION
	2-9 GOVERNANCE STRUCTURE AND COMPOSITION	RJC-Governance-Handbook-September-2020.pdf (responsiblejewellery.com) https://www.responsiblejewellery.com/about/governance/ "
	2-10 NOMINATION AND SELECTION OF THE HIGHEST GOVERNANCE BODY	RJC-Governance-Handbook-September-2020.pdf (responsiblejewellery.com) https://www.responsiblejewellery.com/about/governance/ "
	2-11 CHAIR OF THE HIGHEST GOVERNANCE BODY	RJC-Governance-Handbook-September-2020.pdf (responsiblejewellery.com) https://www.responsiblejewellery.com/about/governance/ "
	2-12 ROLE OF THE HIGHEST GOVERNANCE BODY IN OVERSEEING THE MANAGEMENT OF IMPACTS	Sustainability matters are addressed at the Board of Directors meetings as necessary."
	2-13 DELEGATION OF RESPONSIBILITY FOR MANAGING IMPACTS	The RJC's raison d'être is the minimisation of negative impacts and the maximisation of positive ones. To that end the RJC standard - the Code of Practices - covers a wide range of requirements including human rights, labour rights and environment. All RJC member companies must be independently audited and then certified, against the COP. Where a member is found to have breached the COP there are detailed published procedures for the member to be disciplined - see here: (https://www.responsiblejewellery.com/wp-content/uploads/RJC_Assessment_Manual-2020_30.3.21-1.pdf Assessment Manual pages 18-20 and https://www.responsiblejewellery.com/wp-content/uploads/RJC_Complaints_Mechanism_v2_Dec_2020-1.pdf?_ga=2.98753950.1655020042.1685437887-988857484.1629787907 – Complaints Mechanism; https://www.responsiblejewellery.com/wp-content/uploads/RJC-Articles-of-Association-2010-Revision-final-version-3-1.pdf?_ga=2.107729282.1655020042.1685437887-988857484.1629787907 – Articles of Association, pages 8-10). The RJC Executive Director is responsible for ensuring that impacts are managed. The ED is assisted by an impacts department led by experienced professionals, who are also supported by all RJC departments. Impacts are cross cutting, so all departments are accountable. The ED and impacts department prepare regular reports which are provided to the Executive Committee (which meets twice weekly) and the Board of Directors (bi-monthly).
	2-14 ROLE OF THE HIGHEST GOVERNANCE BODY IN SUSTAINABILITY REPORTING	The Chairman of the Board approves the final report.
	2-15 CONFLICTS OF INTEREST	RJC Policies • Responsible Jewellery Council
	2-16 COMMUNICATION OF CRITICAL CONCERNS	- All complaints and critical breaches are communicated to the Executive Director. - All complaints are also discussed with legal counsel. - Annual statistics on complaints and critical breaches are provided to the Assurance Committee. These can also be found in Pages 36-47 - High and extremely high risks are quarterly communicated to the Executive Director with the option to be communicated to the Executive Committee and the Board. Any extremely high risk would be immediately notified to the Executive Director. An annual risk report is submitted to the Executive Director with the option to be communicated to the Executive Committee and the Board.
	2-17 COLLECTIVE KNOWLEDGE OF THE HIGHEST GOVERNANCE BODY	The Board considers sustainability at every BOD meeting, and is briefed on the progress and impacts of the RJC Code of Practices - a comprehensive sustainability standards.
	2-18 EVALUATION OF THE PERFORMANCE OF THE HIGHEST GOVERNANCE BODY	The RJC COP is a comprehensive sustainability standard covering the entire jewelry supply chain, from mine to retail. The COP is reviewed on a five-year basis, in accordance with the ISEAL Code of Good Practice. Following external stakeholder consultation, the RJC Standards Committee recommends any amendments of the COP to the RJC Board of Directors. The Board is directly elected by the RJC membership as part of the AGM process.

GRI STANDARD	DISCLOSURE	LOCATION
	2-19 REMUNERATION POLICIES	The highest governing body is the Board of Directors, none of whom are remunerated by the RJC. They are senior executives of member companies who are elected to the BOD and donate their services to the RJC.
	2-20 PROCESS TO DETERMINE REMUNERATION	As explained above, the BOD are not remunerated by the RJC. Staff remuneration levels are based on guidance from several independent agencies which specialise in audit, standards development, and assurance recruitment. The RJC also engages an independent HR consultant to provide remuneration and related advice. The BOD is not consulted about staff remuneration and plays no role in remuneration decisions. The Executive Director determines remuneration following recommendations/advice, the annual salary budget and any remuneration policies which may be in force from time to time.
	2-22 STATEMENT ON SUSTAINABLE DEVELOPMENT STRATEGY	Page 5
	2-23 POLICY COMMITMENTS	Pages 7,9, 24-31 https://www.responsiblejewellery.com/about/policies/
	2-24 EMBEDDING POLICY COMMITMENTS	Pages 12-15, 24-31, 60-63
	2-25 PROCESSES TO REMEDIATE NEGATIVE IMPACTS	Pages 36-47
	2-26 MECHANISMS FOR SEEKING ADVICE AND RAISING CONCERNS	Mechanisms for individuals to seek advice on implementing the organization's policies and practices for responsible business conduct; - The RJC have a training email for members to contact us if they need guidance on implementing the COP or CoC - We also have a designated membership team for anything related to member application and initial member information on their declared practices for the application. Mechanisms for individuals to raise concerns about the organisation's business conduct; - We have the Complaints Mechanism which is publicly available (https://www.responsiblejewellery.com/wp-content/uploads/RJC_Complaints_Mechanism_v2_Dec_2020-1.pdf?_ga=2.92519069.1655020042.1685437887-988857484.1629787907). This mechanism can be accessed by RJC members and/or their employees; RJC approved audit firms and/or auditors; any third party with a material interest in member certification or explicitly authorised to represent a Complainant.
	2-27 COMPLIANCE WITH LAWS AND REGULATIONS	The RJC complied with all laws and regulations and has never been sanctioned for non-compliance.
	2-28 MEMBERSHIP ASSOCIATIONS	Pages 28-29
	2-29 APPROACH TO STAKEHOLDER ENGAGEMENT	Effective stakeholder engagement is critical for the development and relevance of our organization, and for the achievement of our desired long-term impacts. It is essential that we understand the full range of perspectives of those who affect and/or are affected by the activities of the RJC and our members. The categories of stakeholders we engage with include RJC members, approved auditors, topic specific experts (individuals, businesses and organisations), other voluntary sustainability schemes, ISEAL, wider industry. RJC is working with stakeholders including the OECD and other bi-lateral partnerships to put responsible sourcing at the heart of what do to ensure our standards continue to lead the way in the jewellery and watch industry. The purpose of stakeholder engagement includes public consultations as part of the review and revision process of the RJC standards; calibration of the audit process via regular Auditor Roundtables; providing a variety of training support to RJC members, approved auditors and the wider industry on the implementation of the Code of Practices Standard, Chain of Custody Standard and industry relevant topics. Harmonisation and cross-recognition with other industry initiatives including the London Bullion Market (LBMA), Fairtrade and Fairmined standards remains key to support implementation of responsible business practices and strengthen our standards (mandatory and voluntary).

GRI STANDARD	DISCLOSURE	LOCATION
		The RJC seeks to ensure meaningful engagement with stakeholders through the following mechanisms: Public consultations take up to 60 days and they are understood as a combination of webinars, teleconferences and direct consultations to ensure all relevant stakeholders are reached and they have the opportunity to provide input. The training support regularly includes webinars accessible across multiple time zones, roundtables, training, toolkits, templates and more. Targeted stakeholders are sent an email in advance of the event, along with newsletter updates, to ensure awareness and encourage participation. Comments received during public consultation are reviewed and published on the relevant website section. Through our wider participation on working groups and impact forums, we continue to openly engage in discussions across the key issue areas including the definition of recycling and recycled gold with the Precious Metals Impact Forum (PMIF) and the World Gold Council's Declaration of Responsibility and Sustainability Principles for example."
	2-30 COLLECTIVE BARGAINING AGREEMENTS	The working conditions and terms of employment of employees are not covered by any collective bargaining agreements. The working conditions and terms of employment of employees are not influenced or determined based on any other collective bargaining agreements from other organisations.
GRI 3: MATERIAL TOPICS 2021	3-1 PROCESS TO DETERMINE MATERIAL TOPICS	Materiality is under constant review, as it is an essential component of determining what matters to most to our stakeholders. In 2022 we conducted an extension stakeholder consultant. During the stakeholder consultation process, our stakeholders were asked to rank our list of material topics. These topics and their associated impacts are listed in order of priority, according to our stakeholders, below. An internal review of these material topics was conducted in 2023, and as the RJC has had no significant changes in the organisation's activities and business relationships, it was established that these material topics still represent the RJC's and our member's most significant impacts in this reporting period. The full process of how we determined our material topics is outlined on page 84 of 2022's APR (https://www.responsiblejewellery.com/wp-content/uploads/RJC_Annual-Report_2022_V2.pdf)
	3-2 LIST OF MATERIAL TOPICS	1.Human Rights Due Diligence 2.Product Integrity and Disclosure 3.Labor Practices 4.Standards Efficiency 5.Responsible Advocacy 6.Environmental Due Diligence and Climate 7.Gender Equality 8.Circularity and Resource Scarcity 9.Community Engagement No changes to this list of material topics have been made since the previous reporting period."
	3-3 MANAGEMENT OF MATERIAL TOPICS	RJC_Annual-Report_2022_V2.pdf (responsiblejewellery.com) 2022 APR page 86-88 Standards section In addition to the material topics described above, we measure our impacts and the effectiveness of our work within the jewellery supply chain through a monitoring and evaluation programme. Performance monitoring is a key component of our M&E system. It focuses on systematic collection and analysis of data throughout their certification journey, to evaluate whether the desired outcomes outlined in our Theory of Change are being achieved. We have recently developed and launched our Indicator Protocol which outlines all the indicators being used in our M&E System that enable us to track performance and monitor our impacts. Further, we periodically undertake in-depth evaluations to provide a deeper perspective of our impacts and progress."



RESPONSIBLE
JEWELRY
COUNCIL

THE COUNCIL FOR RESPONSIBLE JEWELRY
PRACTICES LTD.

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Court, Chancery Lane, London, WC2A 1HP.

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

Registered in England and Wales with
company number 05449042.