



BY THE AUTHORITY OF THE COUNCIL

JC Penney

IS A CERTIFIED MEMBER OF THE
Responsible Jewellery Council

CERTIFIED MEMBER: 0000 0475
CERTIFICATION PERIOD: 23-DEC-14 - 23-DEC-17

A handwritten signature in black ink that reads "James Courage".

JAMES COURAGE
Chairman
Responsible Jewellery Council

A handwritten signature in black ink that reads "Ashish Deo".

ASHISH DEO
Chief Executive Officer
Responsible Jewellery Council

Certification Scope

JC Penney, Plano, USA - corporate headquarters; JC Penney, Haslet, USA - fine jewelry repair and recovery facility; JC Penney, Statesville, USA - warehouse and distribution center facility; JC Penney, USA & Puerto Rico - retail stores

RJC CERTIFICATION INFORMATION – CODE OF PRACTICES

Summary



Responsible
Jewellery
Council

Certified Member JC Penney

Membership Forum Jewellery Retailer

*Certification Number
for this Certification* 0000 0475

Certification Period 23-Dec-14 – 23-Dec-17

Audit Date 21, 22, 30 October 2014; 30 November 2014

Audit Type Re-Certification

*Previous
Certifications* 1

Applicable Standard Code of Practices 2013

Accredited Auditor UL Responsible Sourcing
Lead Auditor: Sheer Garcia
Monica Morales; Carina Carrasco

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Applicable Provisions

- 1. General Requirements:** 1-4 (except 3.2)
- 2. Responsible Supply Chains and Human Rights:** 5-11 (except 7, 11.3-11.4, 12)
- 3. Labour Rights and Working Conditions:** 13-20
- 4. Health, Safety and Environment:** 21-25 (except 21.10)
- 5. Diamonds, Gold and Platinum Group Metals Products:** 26-27 (except 28)
- 6. Responsible Mining Sector:** Not applicable

Provenance Claims

Not applicable

Auditor Statement of Conformance

Based on the scope and findings of the Audit, the sites visited and the available information provided by the Member:

- The Member has demonstrated a conformance level consistent with a 3 year Certification Period.
- The Member has demonstrated a conformance level consistent with the transitional 1 year Certification Period for 1 year.
- The Member is not eligible for RJC Certification due to having four consecutive 1 year Certification outcomes.
- Critical breaches have been identified and the RJC Management Team should initiate disciplinary procedures.

Mid-Term Review

Based on the scope and findings of the Certification Audit/Re-Certification Audit, the sites visited and the available information provided by the Member:

- A. The Member will not require a Mid-Term Review because:**
- No anticipated changes to the Certification Scope during the Certification Period.
- Member has < 25 full time equivalent personnel.
- Low risks of changes to current conformance levels and strong management controls.
- B. The Member will require a desktop Mid-Term Review during the 3 year Certification Period to review progress on corrective action against non-conformances within 12-24 months, but a site visit is not required because:**
- The actions can be verified remotely; or
- No risk to Critical Provisions; or
- There are parallel audit programs for equivalent recognised schemes (e.g. De Beers BPP, SA8000, OHSAS 18001, ISO14001)

C. The Member will require a Mid-Term Review during the 3 year Certification Period that will include the need for site visits because:

- Known and anticipated changes to Certification Scope during the Certification Period
- Certification Audit identified >2 Minor NCs for Critical Provisions; or > 4 Minor NCs in total
- New systems and controls for Critical Provisions that could not be tested at the Certification Audit
- Facilities with risk of non-conformances against Critical Provisions
- Other compelling reason presented by the Lead Auditor. (Please state the reason):

Confirmation

The Auditors confirm that:

- The information provided by the Member is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- The findings are based on verified Objective Evidence relevant to the time period for the assessment, traceable and unambiguous.
- The scope of the assessment and the method used are sufficient to establish confidence that the findings are indicative of the performance of the Member's defined Certification Scope.
- The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

Auditor Signature

On file

Code of Practices Certification Scope

RJC Members must achieve Certification against the Code of Practices within two years of joining the RJC. The Certification Scope must include those Entities, Facilities and Business Activities under the Member's Control that activity contribute to the Diamond, Gold and/or Platinum Group Metals Jewellery supply chain. This includes the following sectors, where applicable:

- Exploration and Mining
- Diamond Trading, Cutting and Polishing
- Precious Metals Refining, Trading and Hedging
- Jewellery Manufacturing and Wholesaling
- Jewellery Retailing
- Service Industries, including grading, assaying, appraising, secure transport providers and others.

Steps in the Certification Process



- Conducted by the Member in accordance with the Certification Scope
- Preparation for Certification Audit by independent third party RJC Accredited Auditors.

- Conducted by independent third party RJC Accredited Auditors
- Selects a representative sample to review from
- Certification Scope Evidence based assessment of conformance

- Auditor prepares Audit Report including Statement of Conformance for the RJC
- Member implements corrective action plan/s, where required.

- RJC reviews Audit Report for clarity and completeness , follow up where required.
- RJC grants Certification based on Auditors' Report
- Certification details posted on website
- Member can use RJC Certification Logo

- Mid-term review, may be required.
- Re-certification audit is required at end of certification period.
- Conducted to confirm continuing conformance and to address changes.

Audit methodology

The RJC Code of Practices documentation is comprehensive and includes an auditable standard, detailed Standards Guidance and Assessment Manual, handbook for certification and assessment tools for businesses and auditors. These are all publicly available and can be downloaded at:

<http://www.responsiblejewellery.com/rjc-certification/code-of-practices-certification13/>

Independent third-party audits are conducted by RJC Accredited Auditors to verify that a Member's business performance and its systems and processes conform to the requirements specified in the RJC Standard. The audit process is a management systems audit aligned with ISO19011. Auditors use the triangulation method of management and employee interviews, documentation review and facility observations to verify an Entity's performance against the applicable standards.

Auditor Accreditation

Third party auditors carrying out RJC Certification audits must be accredited by the RJC, a process which involves assessment of competence, independence and internal quality systems of the auditing firm. RJC also provides mandatory training on its standards for accredited auditors. Auditor accreditation information can be found at:

<http://www.responsiblejewellery.com/auditors/>

RJC Complaints Mechanism

The RJC aims to ensure the fair, timely and objective resolution of complaints relating to potential non-conformance with RJC Certification or RJC's own policies and procedures. Where complaints arise, it is a condition of participation in RJC activities for RJC Members and Accredited Auditors to submit to the RJC Complaints Mechanism and to be bound by the decisions of the RJC. However this does not replace or limit access to judicial remedies.

Full documentation supporting the RJC Complaints Mechanism can be downloaded from:

<http://www.responsiblejewellery.com/contact-us/rjc-complaints-mechanism/>

Disclaimer

No guarantee, warranty or representation is made as to the accuracy or completeness of this information. Compliance with RJC's standards and procedures is neither intended to, nor does it create, establish, or recognise any legally enforceable obligations or rights of, or against, the RJC and/or its Members or signatories.

