A person with a beard, wearing a plaid shirt, is sitting at a wooden desk. They are holding a pen and writing in a small, open notebook. The notebook has several colorful sticky notes attached to it. On the desk, there is a laptop, a cup of coffee, and a glass of water. The background is slightly blurred, showing a warm, indoor setting.

Self-Assessment: How to prepare for your RJC audit

28th September 2022

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01

Code of Practices

Code of Practices (COP) Standard

RJC Code of Practices is fit-for-purpose in an evolving regulatory landscape. The RJC standard offers a holistic approach for the entire supply chain and is aligned with UN Guiding Principles of Business and Human Rights and OECD Due Diligence Guidance.

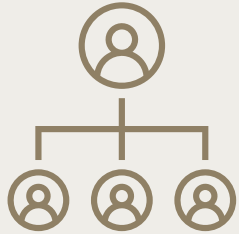
YOUR RJC MEMBERSHIP & CERTIFICATION PROVES YOUR COMMITMENT:

MEMBERS	Apply responsible business practices in preparation for certification
---------	---

CERTIFIED MEMBERS	Definitive credibility of responsible business practices, supported by an independent third-party audit
-------------------	---



Management Systems



MANAGER



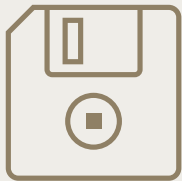
POLICY



RISK ASSESSMENT



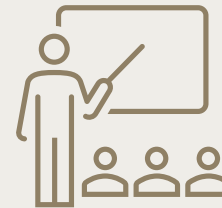
SET PROCEDURES



RECORDS



REPORT



TRAINING



GRIEVANCE
MECHANISM

02

Steps to certification

Certification Process



STEP 1 SELF-ASSESSMENT

The member reflects on their own practices and prepares for an audit.

STEP 2 AUDIT

The auditor reviews evidence to assess conformance.

STEP 3 REPORT

The auditor reports findings The member approves the report The member develops a corrective action plan if required.

STEP 4 CERTIFICATION

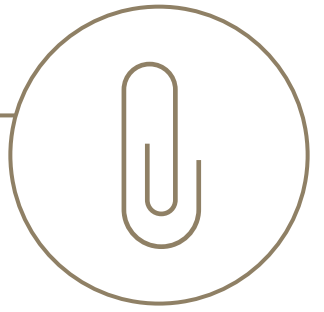
The RJC reviews the audit report and certifies the member (or not). The member promotes their RJC certification.

STEP 5 REVIEW & RECERTIFICATION

The auditor carries out mid-term or other reviews as and when required.

03

What is a self-assessment?



What is a self-assessment?

DEFINES THE
CERTIFICATION
SCOPE

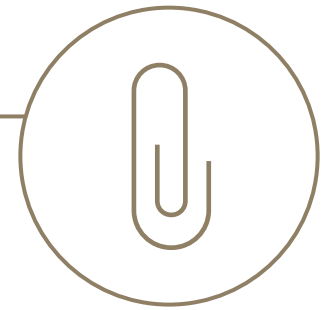
REVIEW
BUSINESS
PRACTICES

ASSEMBLE
RELEVANT
INFORMATION

04

Self-assessment workbook

Self-assessment workbook



ABOUT THIS WORKBOOK	STEPS TO CERTIFICATION	DEFINE THE CERTIFICATION SCOPE	APPLICABLE REQUIREMENTS	PROVISIONS	SUMMARY	CORRECTIVE ACTION PLAN
An introduction to the workbook, and includes answers to frequently asked questions.	Covers the steps to certification – this is another introductory tab, outlining the steps to certification and the role of the self-assessment in preparing for your RJC audit.	This is a very important tab, as it is where you outline your certification scope for your auditor.	This provides a summary of applicable provisions, this is based on the identified certification scope from the previous tab.	These tabs form the main part of the process, and will take the most time to complete. Each tab will take you through a different section of the COP, and eventually through each provision.	This tab gives you a summary of performance for all the sections (hopefully all) that you've completed. It gives you a quick visual guide to how you're doing.	This tab provides a summary of corrective actions required.



RJC self-assessment workbook: An overview

This workbook is a tool for evaluating your company's performance against the 2019 RJC Code of Practices (COP) for **gold, silver, platinum group metals (PGM)**, diamonds and coloured gemstones (rubies, emeralds and sapphires).

The COP defines responsible ethical, human rights, social and environmental business practices and is divided into six sections (tabs in this workbook), each one detailing a number of provisions that can be independently audited to provide objective evidence in support of getting RJC certification:

RJC CODE OF PRACTICES



General requirements



Responsible supply chains and human rights



Labour rights and working conditions



Health, safety and environment



Gold, silver, PGM, diamond and coloured gemstone products



Responsible mining

Provisions 1–4

Provisions 5–14

Provisions 15 - 22

Provisions 23 - 27

Provisions 28 - 30

Provisions 31 - 42

If you can prove that you conform with each provision applicable to your business, you will qualify for RJC **certification**, which you can use as evidence of responsible business practices in communicating with suppliers, customers and other stakeholders.

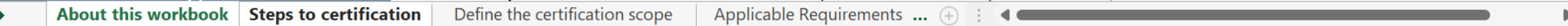
Assessing your own business by filling out the tabs in this workbook is the first step to proving conformance with the COP. Completing a self-assessment is mandatory. Though you do not necessarily have to use **this** workbook to complete your self-assessment, although it is highly recommended. Here are some frequently asked questions to help you complete your self-assessment:

QUESTION

Must I conform to every provision in the COP?

ANSWER

Not necessarily. You only need to conform to those provisions that apply to your business. Some provisions may not be relevant: you can find out which are applicable by completing the '**Define certification scope**' tab in this workbook. Note that even if your risks are low for a particular



Certification scope: Which provisions apply to you?

The information you provide here will be used to tailor the rest of this document. It determines the 'certification scope', or extent of your business to which RJC certification applies; and it must include all the facilities and entities that you own or control. Note that your auditor will also use this information to determine the scope of your audit, including decisions on which facilities to visit and what questions to ask.

Please provide the details for your 'RJC coordinator', or main contact for the COP.	Name	Jane Doe	
	Title	RJC Coordinator/Continuous Improvement Manager	
	Phone	(+44) 7123456789	
	Email	jane.doe@rjc.com	
	Website	www.rjc.com	
	Address of Headquarters	1 RJC Road, London, UK	
	Billing Address (if different from above)		
Select the type of audit from the drop down menu			
If this is not an Initial COP audit, please put the details of your previous audit firm:	Name of Audit Firms		
	Reason for change of audit firm	Same audit firm, no change	
Type of business covered by certification: (Select 'Yes' next to all that apply)	Mine / Producer		
	Gold and/or silver and/or PGM trader or hedger		
	Gold and/or silver and/or PGM refiner		
	Diamond and/or coloured gemstones trader		
	Diamond and/or coloured gemstones cutter and/or polisher		
	Manufacturer	Yes	
	Wholesaler	Yes	
	Retailer	Yes	
	Grading/appraisal provider		
	Security services		
	Other support or service industry		
	Materials in your supply chain: Select 'Yes' next to all that apply	Gold	
Silver		Yes	
PGM		Yes	
Rough diamonds			

Applicable provisions based on the identified certification scope

Code of Practice provision	Critical Provision	Applicability
1.1 Legal compliance	No	Applicable
2.1 Policy and implementation	No	Applicable
2.2 Policy and implementation	No	Applicable
3.1 Reporting	No	Applicable
3.2 Reporting	No	Not applicable as you did not include mining in the certification scope.
4.1 Financial accounts	No	Applicable
4.2 Financial accounts	No	Applicable
5.1 Business partners	No	Applicable
5.2 Business partners	No	Applicable
6.1a Human rights	Yes	Applicable
6.1b Human rights	Yes	Applicable
6.1c Human rights	Yes	Applicable
6.1d Human rights	Yes	Applicable
7.1 Due diligence for responsible sourcing from conflict-affected		



Code of Practice provisions 1-4: General requirements

Complete your self-assessment by filling in the white cells and using the drop down menu where available

COP reference	Provision	Applicability	Rate your performance (from the menu options)	Explain your rating (describe your company processes and list available evidence)	Recommended action (auto-generated)
1.1 Legal compliance	Members shall have systems in place that maintain awareness of and ensure compliance with applicable law.	Applicable	Conformance	We are aware of and compliant with applicable laws (e.g. codes, standards, regulations, licences, permits, decisions, by-laws) in all the places of our business operations (USA, Belgium, India) and the ones related to implementation of all applicable COP provisions. We have systems in place to maintain awareness of and ensure compliance with all applicable laws in those places. There is management process to ensure the compliance with applicable laws including ones related to implementation of COP provisions. All is effective and operational. We have a dedicated person responsible for legal compliance in the business operations. We maintain awareness of legal requirements and changes in the law and can demonstrate how we do that if required as well as walkthrough the steps we take to monitor the compliance with applicable law. We have all required permits and licences. We are in the process of getting a few new ones and there is an evidence of application for any for new permits and licences. We keep list/records of all applicable laws for RJC Provisions 1-42 as per applicability to your business. We have recently conducted a training and a refreshner to keep all employees and business partners aware of the applicable laws and to update about changes in them (date of training: 6 September 2022).	Well done! Maintain your systems and processes.
2.1 Policy and implementation	Members shall adopt a policy/ies that documents their commitment to responsible business practices, is endorsed by senior management, actively communicated to		Conformance	We have adopted policyies on responsible business practices. They are overarching policies, such as Corporate Social Sustainability, Health and Safety and Modern Slavery. The policies are also endorsed by senior management, effectively and efficiently communicated internally and externally and regularly	Well done! Maintain your systems and processes.



Define the certification scope

Applicable Requirements

COP provisions 1-4

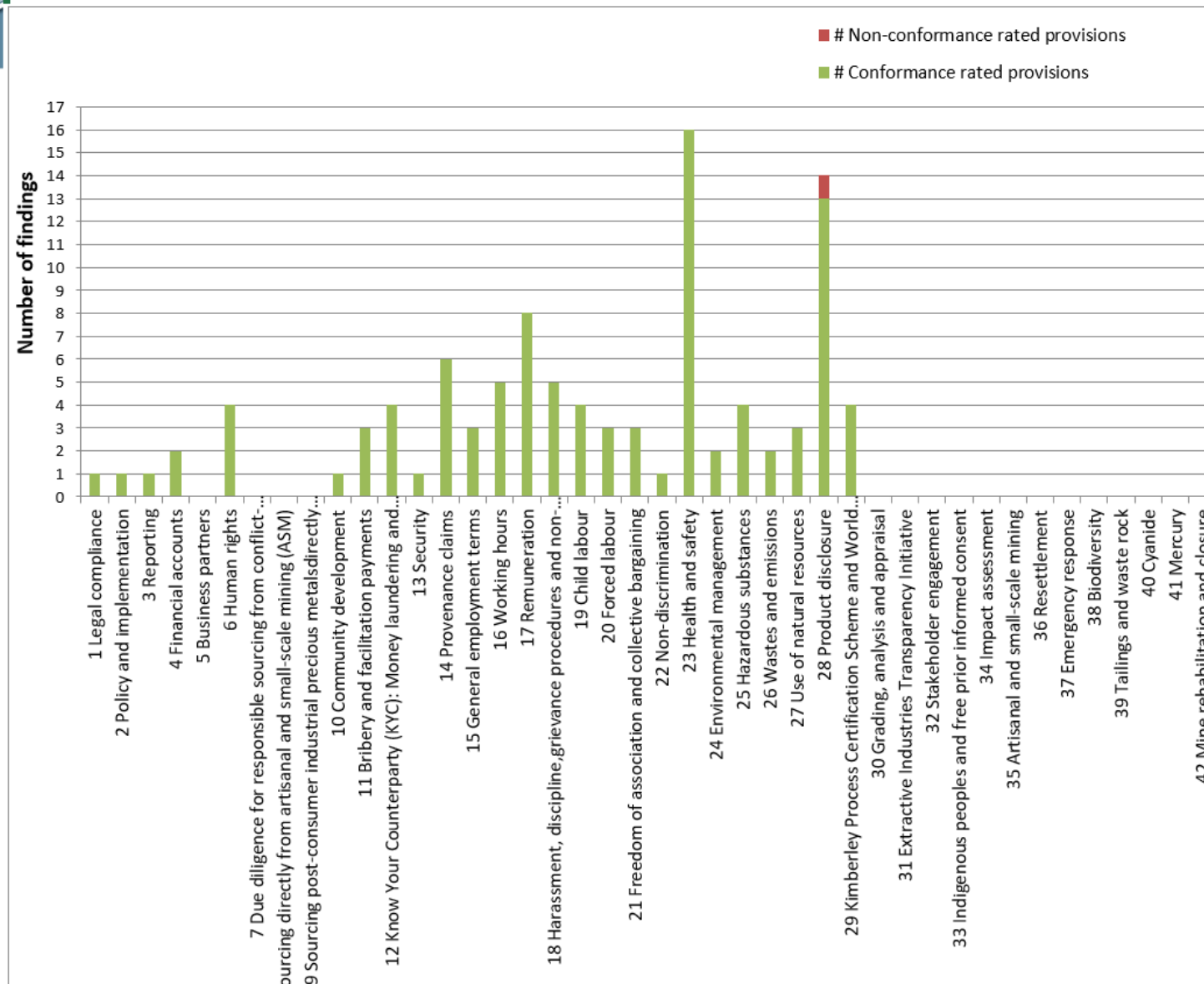
COP provisions 5-14




[Show / Hide Guidance](#)

COP reference	RJC guidance	Examples to demonstrate conformance	Type of provision	Link to standards guidance chapter
1.1 Legal compliance	<p>As an RJC member, you are expected to know the local laws and regulations across all your areas of operations, and to keep abreast of legal developments in legislation and associated case law.</p> <p>COP certification does not aim to provide a full legal compliance audit. Rather, it aims to ensure you have the framework you need to be aware of applicable law and to abide by it over time. In practice, that means you need to show you have systems and procedures in place to access current information about applicable law and to maintain compliance.</p> <p>Make sure you have systems, processes, procedures or methods that can adequately monitor legal developments and identify key areas of legal risk.</p> <p>Legal compliance is covered under a number of COP provisions, such as bribery and facilitation payments, money laundering and finance of terrorism, working hours, remunerations, health and safety and product disclosure. It's important for you to know the local laws and regulations that you as a business must adhere to.</p> <p>If there is a difference between applicable law and a COP requirement, whichever is more stringent should be followed.</p>	<ul style="list-style-type: none"> Records of your efforts to raise employees' and contractors' awareness of legal requirements (through communications or training). A register of applicable law that identifies relevant statutes and regulations. A subscription to legal advice or information. Details of any available legal counsel used. Legal compliance audits if you've done any (this is not a requirement). A procedure for regularly evaluating your compliance with applicable law. A procedure for monitoring changes in applicable law and communicating the implications of those. 	<div>Management responsibility</div> <div>Set procedures</div> <div>Training</div>	Legal compliance
2.1 Policy and implementation	<p>A policy is an organisation's statement of intent, as formally expressed by its top management. It's the foundation of any management system, outlining aims and objectives.</p> <p>Policy statements should:</p> <ul style="list-style-type: none"> - be endorsed at the highest level of your organisation; - set clear expectations of your employees and business partners; - be reflected in your operational policies and procedures; - be reviewed once a year, and updated whenever the nature or activity of your business changes; - apply to all parts of your business covered by your RJC certification scope; and - be publicly accessible. <p>You can choose to incorporate all RJC-required policies within a single overarching policy; or have multiple, issue-specific policies to comply with different RJC provisions.</p> <p>Note that if you have multiple entities that do not operate under a central management, each one will need to have all the RJC-required policies.</p> <p>When you start to develop a policy/ies, don't expect it to be perfect on your first go. Your policy statements will get more detailed and thorough as you review and improve and as you learn from experience.</p> <p>The best policies are specific to a company and are not borrowed from or written by outsiders – while we have templates to guide you, we expect members to work to develop their own policies and not simply to rely on the material RJC provides.</p>	<ul style="list-style-type: none"> A 'responsible business practices' policy. Recent examples of how your company has told employees, stakeholders and the public about this policy, eg office posters, newsletters, webpage, invoices, letters, e-newsletter. 	<div>Written policy</div>	Written policy

Summary of your self-assessment



[Click here to list the performance requirements that you do not conform with](#)

Your company's performance			Your corrective action plan						
COP Provision	Performance rating	Details of your non-conformance	3.1 Action (what)	3.2 Responsibility (who)	3.3 Due date (when)	3.4 Status	3.5 Date reviewed	3.6 Completion sign off	3.7 Comments
Click the button above to automatically complete these four columns			Describe the actions needed to address the non-conformance	Identify the person responsible for implementing these actions	Set a target date for completing the actions	Identify whether the actions are still pending, in progress or completed	Say when the actions were last reviewed	Name the person confirming all actions are complete	Add any further comments about the actions
OECD STEP 1A All materials downstream	Non-Conformance	We have a system for due diligence and risk is analysed (few gaps were identified when reviewing supply chain mapping), however system and compliance is not fully complete: We have yet to align our Supply Chain policy with OECD Guidance.	Updating commitment documents and policy for due diligence Updating procedure to describe due diligence. This procedure must take into account RJC and non-RJC certified suppliers Create an email address for grievance mechanism, and communicate this mechanism to stakeholders Create a document / register for risk analysis Create a procedure for risk analysis Complete risk analysis register	Assigned senior manager to oversee compliance with OECD Due Diligence Provisions.	30-Nov-20	Open	01-Sep-20		Further support of RJC is required as this is a new area for our business.
OECD STEP 1C All materials downstream	Non-Conformance	It was not asked to refiners and diamond & gemstones suppliers how they perform their due diligence and where they source materials from.	Updating commitment documents and policy for due diligence Updating procedure to describe due diligence. This procedure must take into account RJC and non-RJC certified suppliers Create an email address for grievance mechanism, and communicate this mechanism to stakeholders Create a document / register for risk analysis Create a procedure for risk analysis Complete risk analysis register	Assigned senior manager to oversee compliance with OECD Due Diligence Provisions.	30-Nov-20	Open	01-Sep-20		Further support of RJC is required as this is a new area for our business.
OECD STEP 1D All materials downstream	Non-Conformance	We have not communicated our expectations to all our suppliers and not regularly. The supply chain policy, which is not aligned to OECD Guidance (Step 1A) has not been recently communicated to business partners, suppliers, etc.	Create a specific supply-chain policy in accordance with RJC COP 2019. Communicate the policy and expectations to all suppliers	Assigned senior manager to oversee compliance with OECD Due Diligence Provisions.	30-Sep-20	Open	01-Sep-20		Sufficient expertise in-house. To use external consultant, if required.

...

[COP 7 All material \(downstream\)](#)

[COP provisions 15 - 22](#)

[COP provisions 23 - 27](#)

[COP provisions 28 - 30](#)

[COP provisions 31 - 42](#)

[Summary](#)

[Corrective action plan](#)

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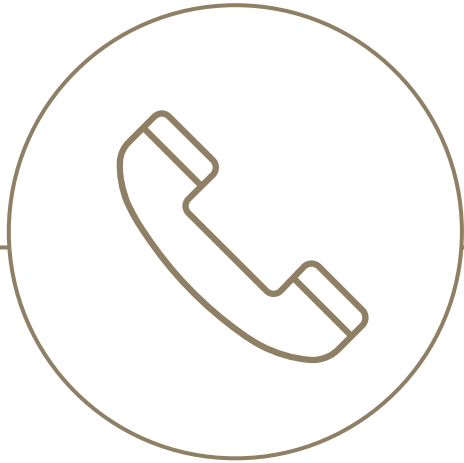
:

←

05

Audit

After completing your self-assessment



CONTACT
PREFERRED AUDIT
FIRM



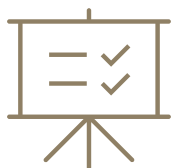
SEND SELF-
ASSESSMENT



INFORM RJC



At the audit



OBJECTIVES



ACTIVITIES



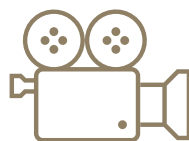
INTERVIEWS



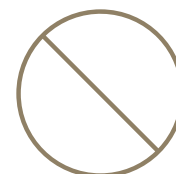
STAFF
PARTICIPATION



RESPONSES



RECORDINGS



REPERCUSSIONS



ANONYMITY



Audit report



Auditor closes audit, communicates findings, and makes certification recommendation



Member has 1 week to close findings & send evidence



Member has 1 month to send CAP no evidence



Auditor finalises audit report



Member approves audit report and signs declaration form



Auditor sends audit for review within max 2 months from audit



RJC notifies you via email and updates your webpage and member listing



You can download your certificate and logo from your member portal account

06

Certification



Non-conformances

MINOR NON-CONFORMANCE

Does not wholly conform to the relevant COP provision.

No imminent significant risk to employees, the community or the environment.

Corrective actions should be implemented before the next recertification

MAJOR NON-CONFORMANCES

Does not conform to the relevant COP provision.

Pose an imminent significant risk to employees, the community or the environment.

CAP must be sent to auditor for approval within one month of the audit.

CRITICAL BREACH

Business practices perform in a way that does not conform to critical COP provision.

Where a proven major non-conformance of the critical COP provisions has been identified.

Deliberate falsification of information, systemic failure of management systems, or a total lack of controls of business risks has taken place for any CoC provision.



Critical Breaches

6.1 HUMAN
RIGHTS

7.1 DUE
DILIGENCE

16.1, 16.2
WORKING
HOURS

17.1, 17.4
REMUNERATION

18.1
HARASSMENT
& DISCIPLINE

19.1, 19.2
CHILD LABOUR

20.1 FORCED
LABOUR

22.1 NON-
DISCRIMINATION

25.2
HAZARDOUS
SUBSTANCES

26.2C WASTES
& EMISSIONS

28.1 PRODUCT
DISCLOSURE

29.1 KPCS &
WDC



Certification types

AUDIT TYPE	WHEN	MINOR NON-CONFORMANCES ONLY	ANY MAJOR NON-CONFORMANCES	ANY CRITICAL BREACHES Closure of critical breaches within 4 weeks with audit put on hold
Initial Certification	Within two years of becoming a member	Three years	One-year	No certification
Mid-term Review	12-24 months after certification	Continue	A three-year certificate is reduced to one year	Certification is suspended
Re-certification	At the end of the certification period	Three years	One year	No certification

07

Resources

Is there any support available?

There are number of resources to support you in implementing the 2019 Codes of Practices



Human Rights Due Diligence
Toolkit



Risk Assessment Toolkit



Due Diligence Toolkits



Assessment Manuals



Reporting Templates



Online Modules



Provision Specific Training
Pages



Member Helpdesk
[training@responsiblejewellery.
com](mailto:training@responsiblejewellery.com)



08

Questions



training@responsiblejewellery.com



RESPONSIBLE JEWELLERY COUNCIL

LEAD WITH PURPOSE . INSPIRE WITH TRUST
CONTRIBUTE TO DEVELOPMENT

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