



Attn: [REDACTED] (Officer-in-charge)
Special Procedures Branch
Office of the High Commissioner for Human Rights
United Nations
BY EMAIL ONLY - [REDACTED]

Ref: AL OTH 13/2025

10th March 2025

Dear Ms. [REDACTED],

We acknowledge receipt of your letter dated 14th of January 2025 regarding alleged human rights violations committed at Chatree gold mine against local communities. Thank you for bringing this matter to the attention of the Responsible Jewellery Council (RJC) and for the opportunity to provide our observations.

At RJC, our mission is firmly rooted in responsible resource management and an unwavering respect for affected rightsholders, working with and advocating for the rights of workers and local communities. Through our standards, certification, and collaborative initiatives, we operate across the entire jewellery and watch supply chain.

It is from the standpoint of a standard-setting organisation that we have answered the questions below, with detailed appendices to provide you with further information and links to supporting documents publicly available on our website. We ask that you kindly note the confidential nature of information shared between the RJC and its member companies and that we are not at liberty to disclose confidential information to any third party except when required by law.

1. Please provide any additional information and/or comment(s) you may have on the above-mentioned allegations.

The Responsible Jewellery Council ([RJC](#)) is a not-for-profit standard-setting organisation for the jewellery and watch industry with a membership of companies from mining through to retail. These commercial members of the RJC are seeking certification against the RJC standards, the Code of Practices ([COP](#)), the Laboratory Grown Material Standard ([LGMS](#)) and the Chain of Custody Standard ([COC](#)). The RJC plays a crucial role in promoting responsible

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practices and ethical standards within the watch and jewellery industry and is a code-complaint member of [ISEAL](#) and a member of the United Nations Global Compact since 15 January 2009. We take nonconformity very seriously and aim to ensure the fair, timely, and objective resolution of complaints relating to potential nonconformity with the RJC certification and assurance system, or with the RJC's conduct, in accordance with the [RJC Complaints Mechanism](#).

We understand from your letter that several companies have been referenced in connection with Chatree gold mine and would like to clarify the nature of the relationship between these companies and the RJC. Chatree Gold Mine, operated by Akara Resources Public Company Limited and Kingsgate Consolidated Limited are not members of the RJC. Therefore, please note kindly that the RJC has no direct influence over the activities of non-RJC certified companies and non-RJC members. Hence, part of the allegations is outside the scope of the RJC.

Downstream buyer Precious Metals Refining Co is a certified RJC member, and as such is required to conform with the RJC governing documents and abide by the RJC certification requirements.

Upon receipt of your letter, the RJC has reached out to this member on the matter. We are pleased to see that they have since directly engaged with you and responded to these allegations. Our review is conducted in accordance with the steps outlined in the RJC Complaints Mechanism. As such, should you be able to share recent evidence to support the allegations, we would be able to follow up on the matter according to our procedure.

We would like to share with you an overview of the RJC's standards and assurance processes as below.

Standards

The RJC has two standards that apply to our members:

The RJC Code of Practices (COP) is a mandatory standard that defines the responsible business practices (ethical, human rights, social and environmental) that all certified RJC members must adhere to, within the jewellery and watch industry, from mine to retail. All RJC members must be certified against this standard within two years of joining the RJC and maintain this status thereafter. Certification is achieved through an independent third-party audit of their practices.

The COP includes requirements on a number of topics, including human rights, labour rights, health and safety, product integrity and the environment. The COP aligns with several existing frameworks and initiatives that outline best practices for businesses. This includes the OECD Due Diligence Guidance for Responsible Supply Chains for Minerals from Conflict-Affected

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and High-Risk Areas (COP provision 7), as well as the UN Guiding Principles on Business and Human Rights (COP provision 6). Members are required to implement both Human Rights Due Diligence and Supplier Due Diligence RJC standard requirements, aligned to these frameworks and initiatives, and to assess the practices of their counterparties. Through this, members are required to report publicly on their efforts and provide information on any materials sourced from Conflict-Affected and High-Risk Areas (CAHRAs) to the RJC.

In addition, gold refiners agree to annually disclose confidentially information with the RJC on the country(s) of origin (RCOI) of gold received. This requirement is used to maintain the integrity of harmonisation with other programs recognised by the RJC, in particular with the Responsible Minerals Initiative (RMI) Gold Refiner Standard and the London Bullion Market Association (LBMA) Responsible Sourcing Programme. It also serves to inform the RJC's training around the identification of Conflict Affected and High-Risk Areas (CAHRAs).

In addition to provisions 6 and 7 of the COP standard (as mentioned above), the COP also indirectly addresses human rights risks and impacts through other relevant provisions, including but not limited to labour rights and health and safety. The standard also has a section on responsible mining and mineral processing which includes 13 provisions on topics such as stakeholder engagement, resettlement, impact assessments, artisanal and small-scale mining (ASM) and large-scale mining, and more.

The RJC Laboratory Grown Material Standard (LGMS) is a mandatory standard that defines the responsible business practices (ethical, human rights, social and environmental) that all certified RJC members dealing in laboratory grown materials must adhere to.

The RJC Chain-of-Custody Standard (COC) defines requirements 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 the COP, which is mandatory for all RJC members.

A COC is a documented sequence of custody of material as it moves along the supply chain. The COC Standard, first developed in 2012, defines the requirements for creating a chain of custody 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.

Both the COP and COC have recently completed their formal periodic review process in line with ISEAL requirements that included multiple rounds of public multistakeholder consultation. The updated standards were released in December 2024. Please see further

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information on the Standards Development, [Standards Committee](#) and [Standards Setting Procedure](#) on the [RJC website](#).

Assurance

Audits of the RJC standards are conducted by independent [third-party audit firms](#) that are approved to conduct RJC audits, which are completed in accordance with the [RJC Assessment Manual](#), to be replaced as of 1st of July 2025, by the [RJC Certification Process Requirements for Certification Bodies and Auditors](#) and associated [appendices](#). Third-party auditors review the processes and underpinning management practices of RJC member companies and certification is granted if the company is compliant with the RJC standards. The RJC itself does not act as an auditor or undertake audits of its members in its own right. The [member's certificate](#) is issued at the recommendation of the audit firm, however, the RJC does conduct quality reviews of the audit reports submitted.

COP/LGMS Audit

Audit and certification against the COP/LGMS are mandatory for all RJC members, depending on the materials in scope; and must be achieved within two years of a company becoming an RJC member. Ongoing recertification is required to retain RJC membership.

Auditing involves an initial certification audit followed by a mid-term review within 12–24 months (if recommended by the audit firm). If the auditor finds no, or only minor, nonconformities, recertification is required every three years. If the auditor finds major nonconformities, the member will only be certified for one year, and only on the condition that it develops an auditor-approved corrective action plan. Members cannot have more than three consecutive one-year certificates. As of the 1st of July 2025, all members will undergo a mandatory surveillance audit at 12-18 months and 1-year certificates will no longer be available as certification will not be granted for members with open major nonconformities.

COC Audit

Audit and certification against the COC are voluntary and are not a requirement of RJC membership. Only COP-certified RJC members, or entities under the control of a COP-certified RJC member, can be certified against the COC Standard. Auditing involves an initial certification audit followed by a surveillance audit within 12–24 months. If the auditor finds major nonconformities, the member will not be certified.

Audit Firms

The credibility of RJC certification hinges on the quality and independence of third-party audit firms. It is of the utmost importance that auditors have appropriate experience and

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competence to manage RJC certification audits in a competent, consistent, impartial, transparent, and credible manner for RJC members.

Audit firms who perform RJC audits undergo a thorough onboarding process, where their application is reviewed by a third-party assessor with appropriate experience to conduct a document review of the application and the applicant audit firm before a third-party oversight assessment of their head office is carried out in order to verify their systems are aligned with the requirements of the [RJC Accreditation Process and Criteria for audit firms and auditors](#). This assessment produces a report detailing its findings, with follow-up and closure of any findings managed by the appointed third-party assessor according to their procedures. Once findings have been addressed, the RJC Assurance Committee reviews the application of the audit firm and decides whether to approve it or not for conducting RJC audits, in line with the RJC Accreditation Process and Criteria. Once an audit firm is approved, it will regularly undergo oversight assessments by the third-party assessor to monitor the quality of its auditing services. A full list of the audit firms who are approved to conduct audits for the RJC is available [here](#).

Auditors

Auditors for the RJC are affiliated to and recommended by their approved audit firms, with their application containing their education, knowledge, training, qualifications and experience outlined to demonstrate that the requirements outlined in Appendix 1 of the [RJC Accreditation Process and Criteria](#) are met.

Their application and supporting material are reviewed by a third-party assessor, with the outcome returned to the audit firm that represents the auditor. Following the review and approval of their application, applicant auditors undertake mandatory training on the RJC standards and audit processes and pass related assessments before they can conduct RJC audits. Failure to pass these assessments will result in a rejection of their application.

Assurance Oversight

In line with ISO 17011 and the [ISEAL Code of Good Practice](#), the competence and consistent performance of audit firms and auditors is periodically reviewed as part of an effective oversight mechanism. As a result, witness assessments of member audits and assessments of audit firms' head offices are conducted both by the audit firms, and the independent third-party oversight assessor, Assurance Services International (ASI), to ensure that all parties are in keeping with the requirements and expectations of the RJC.

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Assurance Committee

We operate an [Assurance Committee](#) as part of our RJC Governance Framework. The role of the Assurance Committee is to oversee the ongoing evolution and maintenance of the RJC assurance system. The committee assists in the development of policies and procedures that relate to the certification of members and accreditation of third-party audit firms. The Assurance Committee is comprised of several member representatives, as well as assurance technical experts from other schemes in various industries.

- Please highlight the steps that your company has taken, or is considering to take, to protect against negative human rights impacts of its business activities, ensuring that you conduct effective human rights due diligence to identify, prevent, mitigate and account for how you address your impacts on human rights throughout your value chain, as set forth by the UN Guiding Principles on Business and Human Rights (UNGPs).**

Please see below the steps that the RJC takes as a standard-setting organisation to prevent, mitigate and account for human rights in our value chain, comprising of member companies:

Membership Application Screening

The application process for companies to join the RJC is extensive and is under constant review of how this can be strengthened, to maintain the highest standards of ethical and responsible business practices.

All applicants are required to submit an RJC application form, which in 2021 underwent extensive amendments to strengthen the RJC's due diligence of its members following Anti-Money-Laundering and Counter-Terrorism Financing due diligence guidance from the Financial Action Task Force. The application form must be supported with further documentation, such as organograms, business registration documents, and identification documents for beneficial owners & directors.

Upon submission, all applications are reviewed and both companies and relevant individuals are screened using Refinitiv World Check due diligence database to identify any sanctions, criminal records, negative media, PEPs (Politically Exposed Persons) and a wide range of individual and company data which may inform the RJC's decision to approve or reject a company. The RJC has also recently taken the decision to introduce a secondary due diligence tool, Orbis. The tool provides access to data on over 400 million companies worldwide and covers a range of data points including financials, ownership structures, corporate linkages and detailed company profiles.

Membership Agreement

The RJC Membership Agreement contains binding commitments that members must abide by, which include commitments on conduct and compliance with the RJC governing

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documents and standards. Further details on the Membership Agreement can be found in Appendix C.

Ongoing Enhanced Member Due Diligence (all members)

All RJC members are required to re-submit supporting documents for due diligence to the RJC periodically depending on the risk rating given after the review or when any significant changes to the company occur. In addition, all existing RJC members are in scope for any strengthening of the RJC member due diligence systems, in line with the evolving standards and expectations of the industry.

Ongoing Member Monitoring

As outlined above, all applicants are screened using World Check at the point of application to review any media reports relating to members' adverse human rights impacts. In addition to this, all refiner, miner and high-profile applicants and members are monitored through our media scanning service provided by assurance oversight provider, ASI. These daily scans review industry and local news sites to identify high-risk reports relating to the RJC and RJC refiner, miner and high-profile members. Upon identification of any reports regarding members and any actual or potential adverse human rights impacts or broader violation of the RJC standards or membership agreement, ASI refers this finding to the RJC to be processed in line with its Complaints Mechanism.

Further to this, RJC stakeholders can also report an incident (a suspected or actual wrongdoing) directly to ASI using the online reporting form [here](#) and ASI will follow its procedure to process and respond to incidents as per the [ASI Incident Handling Procedure](#)

Complaints Mechanism

[The RJC Complaints Mechanism](#) defines how the RJC responds to complaints regarding potential nonconformity with the RJC assurance and certification system or with the RJC's conduct. The mechanism is available on all pages of the RJC website, via the footer section. The Complaints Mechanism includes information on:

- How stakeholders may submit complaints, including flowcharts to aid complainants in understanding how to use the mechanism and the steps that will be taken during the process;
- Timeframes for complaints management;
- Stakeholders who are eligible to submit complaints;
- Criteria for admissible and out-of-scope complaints;
- Types of supporting evidence;
- Confidentiality and anti-trust policies;
- Possible outcomes of the complaint's mechanism;

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- Disciplinary proceedings, including that these may be triggered without an active complaint, where known misconduct has been identified or raised (such as through ASI identifying media incident);
- How the RJC records complaints, and how we analyse this data to determine whether corrective actions can be implemented to prevent or mitigate similar grievances in the future;
- The complaints procedure does not replace or limit access to legal remedies.

The RJC also requires members and accredited audit firms to have their own complaints mechanism and dispute resolution procedures. The requirements for these mechanisms are established in COP 2019 provision 18.4 for members, and in Certification Process Requirements for Certification Bodies and Auditors provision 30 for audit firms.

Prevent, Mitigate & Account

Following the identification of any suspected or actual wrongdoing, the RJC reviews and appraises these reports, implementing appropriate actions to mitigate or avoid evidenced risks in line with its procedures outlined in the RJC Complaints Mechanism.

This can also include amendments to guidance, standards, assurance documentation and/or further support and training for its stakeholders. The RJC delivers periodic calibration and mandatory training to programme managers of audit firms, and bi-annual webinars for auditors (in addition to mandatory training for standards and assurance as outlined above) on how to audit the standards and address any issues of interpretation.

Members receive access to [resources](#) in the form of in-depth toolkits on the implementation of these provisions, as well as regular webinars and one-on-one support from RJC Training to guide implementation. All of these activities, resources and guidance have a specific focus on COP 6 (Human Rights Due Diligence) and COP 7 (Due Diligence for Responsible Sourcing from Conflict-Affected and High-Risk Areas), as these are the provisions we find which members need the most support to implement.

In addition, the RJC regularly participates in projects funded by ISEAL. One relevant example is a project focused on due diligence and grievance mechanisms, in line with the UNGPs. with several publicly available outputs: [Grievance Mechanisms Briefing Note](#), [Human Rights Due Diligence Briefing Note](#), [Using Third Parties to Support the Design and Implementation of Grievance Mechanisms](#).

- 3. Please provide information on how your company addresses human rights risks and impacts linked to actual and potential procurement activities in its policies, frameworks and strategies, in line with the UN Guiding Principles on Business and Human Rights.**

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The RJC annually publishes an aggregated summary of the complaints received, the stakeholder groups who raised them and the follow-up actions the RJC has taken in response to these, which can be found in the [RJC Annual Progress Report](#).

The Annual Progress Report also contains a summary of Critical Breaches (a major finding against a critical provision, which includes COP 6 & 7), the member activity where they were identified and the country where they were located.

4. Please indicate specific remedial measures that your company has taken or is considering taking to prevent being associated with human rights law, international criminal law and international humanitarian law abuses.

As shared above, the RJC is a standard-setting membership organisation, with no direct influence over the activities of non-members, such as Akara/Chatree. The RJC has engaged with the named member, Precious Metals Refinery Co. regarding this matter. We are aware of their direct engagement with you and response to these allegations. Our review of the matter is conducted in accordance with the steps outlined in the RJC Complaints Mechanism.

5. Please provide detailed information with respect to measures taken by your company to respect human rights, including to conduct a human rights due diligence processes when purchasing goods and services from companies. Has your company taken any measures to undertake meaningful stakeholder engagement, including with human rights defenders and civil society, to know and address human rights-related impacts linked to its procurement?

As noted above, the RJC is a standard-setting membership organisation, with no direct influence over the activities of non-members. The RJC has launched a review of the allegations in this letter with the named member, Precious Metals Refinery Co., and we are aware of their direct engagement with you and response to these allegations. Our review of the matter is conducted in accordance with the steps outlined in the RJC Complaints Mechanism.

Stakeholder engagement is a member requirement embedded throughout the COP (including COP 6 & 7), in addition to being a stand-alone provision ([COP 33](#)) for members with mining (including exploration) or mineral processing operations, with civil society being specifically referenced as a stakeholder group to engage.

6. Please describe the guidance, if any, that the Government of United Kingdom of Great Britain and Northern Ireland has provided to your company, or to which your company has access, on how to respect human rights throughout your operations, in line with the UNGPs.

The RJC standard-setting process sets out how any stakeholder, including government organisations, can comment on and contribute to our standards. At the start of any formal consultation period, we conduct a detailed stakeholder mapping exercise to ensure broad and inclusive engagement. This process helps incorporate diverse perspectives, including on

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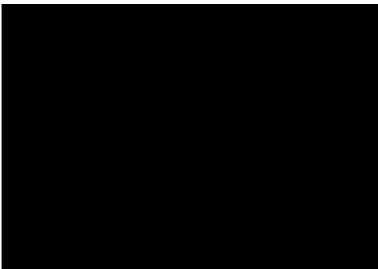
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the human rights and due diligence provisions outlined above, strengthening the rigour, effectiveness, and value of our standards. Our Standards Committee, a working body of up to 28 industry and non-industry experts, meets regularly with the executive team to guide and advise the RJC with respect to RJC standards and associated guidance and governance framework. The RJC abides by all UK law and attends Human Rights seminars and other briefings hosted by the government.

We trust this information is helpful in responding to your questions, while providing an overview of the RJC, our standards and assurance and certification systems, as well as the requirements for our members. Please do not hesitate to contact us should you require any further clarification.

Yours sincerely,



**John Hall,
Interim Executive Director
Responsible Jewellery Council**



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Appendix

A. Governance of the RJC

The management of the Council is entrusted to the Board of the Council, who maintain the ultimate responsibility for the overall management of the Council, with general management and supervision of the Council delegated to the Executive Committee. The constitution of the RJC is outlined in the [Articles of Association](#). Further information on the Governance of the RJC can be found in the [RJC Governance Handbook](#).

B. ISEAL Membership

The RJC is a member of [ISEAL](#), a global membership association for credible sustainability standards, working to support schemes, like ours, improve how they operate, deliver greater impact and ultimately increase the effectiveness, integrity and greater uptake of sustainability standards. The RJC is the only ISEAL Code-compliant member for sustainable standards and practices in the watch and jewellery industry, reaffirming RJC's position as the leading standards authority in the global watch and jewellery supply chain. To be ISEAL Code compliant means to have successfully undergone the rigour associated with an ISEAL independent evaluation against the [ISEAL Code of Good Practice](#).

C. RJC Membership Agreement

The RJC Membership Agreement contains binding commitments that members must uphold including that they must acknowledge and agree that engaging in dishonourable, improper or unprofessional conduct, or conduct which might bring the RJC into disrepute, or other conduct or circumstances concerning our membership of the RJC which might result in reputational harm for the RJC shall include, without limitation, any conduct, actions or omissions (i) of the Applicant Company (whether directly or indirectly) or (ii) with which the Applicant is associated, including through the conduct, actions or omissions of any member of the Applicant Company's Group, any of its Directors, any of its Ultimate Beneficial Owners, any other company or person who owns or Controls the Applicant Company or who is under the ownership or Control of the Applicant Company or who is in a material business relationship with the Applicant Company, related to:

- i. any abuses or violations of Human Rights (as defined in the RJC Code of Practices (COP));
- ii. any use or facilitation of the use of Child Labour or Forced Labour (each as defined in the RJC Code of Practices (COP)) or other serious abuses or violations of labour rights;
- iii. any trading with any conflict minerals or diamonds (as defined within the scope of the OECD Guidance and/or the Kimberley Process Certification Scheme);

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- iv. any criminal conduct or other conduct in breach or violation of requirements of law or regulation which are binding upon the relevant person or any of its property or to which the relevant person, or any of its property, is subject in accordance with established principles of international law (including applicable anti-money laundering, anti-bribery and counter terrorist financing laws and regulations);
- v. any serious abuses, violations or other breaches of applicable requirements of law, regulation or industry standards concerning Health and Safety or the Environment (each as defined in the RJC Code of Practices (COP)) or other serious adverse impacts on the Environment;
- vi. being designated under Sanctions, carrying on business activities with sanctioned persons in breach or violation of applicable Sanctions or otherwise acting in breach or violation of Sanctions; or
- vii. any fraudulent or dishonest conduct including, but not limited to, conviction or enforcement action relating to fraud, embezzlement, falsification of documents, misappropriation of funds or assets, or tax evasion.

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