



THE WORLD JEWELLERY CONFEDERATION

**2018-1**

**CIBJO/Responsible Sourcing Commission**

# **The Responsible Sourcing Book**

<b>Foreword .....</b>	<b>2</b>
<b>Introduction and Background .....</b>	<b>5</b>
<b>CIBJO RESPONSIBLE SOURCING POLICY</b>	
<b>1. Scope of the Policy .....</b>	<b>6</b>
<b>2. Challenges in the Jewellery Supply Chain.....</b>	<b>6</b>
<b>3. The CIBJO Responsible Sourcing Policy .....</b>	<b>6</b>
<b>3.1. Establish and Implement a Responsible Sourcing Policy .....</b>	<b>7</b>
<b>3.2. Supply Chain Due Diligence .....</b>	<b>8</b>
<b>3.3. Know Your Counterparty.....</b>	<b>9</b>
<b>3.4. AML, Bribery and Facilitation Payments.....</b>	<b>9</b>
<b>3.5. Risk Assessment .....</b>	<b>10</b>
<b>3.6. Human Rights .....</b>	<b>10</b>
<b>3.7. Product Integrity.....</b>	<b>11</b>
<b>3.8. Early Warnings, Grievances and Whistle-Blowing .....</b>	<b>11</b>
<b>3.4. Responsible Sourcing Certification .....</b>	<b>11</b>
<b>4. Appendices.....</b>	
<b>4.1. Reference Lists, Industry Guidance &amp; Standards Organisations... 12</b>	
<b>4.1.1 General Responsible Supply Chain Guidance and Standards .....</b>	<b>12</b>
<b>4.1.2 Responsible Supply Chain Standards for Specific Metals and Gemstones.....</b>	<b>12</b>
<b>4.1.3 Guidance and Standards for Artisanal Sourcing .....</b>	<b>12</b>
<b>4.1.4 Audit Companies Specialising in Responsible Sourcing .....</b>	<b>13</b>
<b>4.2. CIBJO Responsible Sourcing Checklist .....</b>	<b>14</b>

## Foreword

CIBJO is the French acronym for the Confédération Internationale de la Bijouterie, Joaillerie, Orfèvrerie, des Diamants, Perles et Pierres, which translates as the International Confederation of Jewellery, Silverware, Diamonds, Pearls and Stones (normally shortened to the International Jewellery Confederation). Founded in 1926 as BIBOAH, a European organisation whose mission was to represent and advance the interests of the jewellery trade in Europe, it was reorganised in 1961 and renamed CIBJO, in 2009 it was once again reorganised and officially named “CIBJO, The World Jewellery Confederation”. Today CIBJO, which is domiciled in Switzerland, is a non-profit confederation of national and international trade associations including commercial organisations involved in the jewellery supply chain. It now has members from countries representing all five continents of the world. CIBJO printed its first deliberations on terminology and trade practices in 1968.

It is the task of CIBJO to record the accepted trade practices and nomenclature for the industry throughout the world. The records of the trade practices complement existing fair trade legislation of a nation or in the absence of relevant national laws they can be considered as trading standards. In countries where laws or norms exist, which conflict with the laws, norms or trade practices in other countries, CIBJO will support the national trade organisations to prevent trade barriers developing. The purpose of CIBJO is to encourage harmonisation, promote international co-operation within the jewellery industry, to consider issues which are of concern to the trade worldwide and to communicate proactively with members. Foremost amongst these the aim is to protect consumer confidence in the industry. CIBJO pursues all of these objectives through informed deliberation and by reaching decisions in accordance with its Statutes. CIBJO relies upon the initiative of its members to support and implement its standards, and to protect the trust of the public in the industry.

Any trade name used in this document is information given for the convenience of users and does not constitute an endorsement.

The work of CIBJO is accomplished through Committees, Commissions and Sectors. Committees and Commissions consider standards for use in the jewellery supply chain. Sectors represent levels of trade in the jewellery industry. Sectors and commissions advise the Executive Committee on current trade practices and issues that affect the jewellery industry.

Three independent sectors exist within the confederation:

Sector A - The Products Sector

Sector B - The Supply Chain Sector

Sector C - The Service Sector

The Executive Committee may appoint Commissions that consider detailed issues. At present these are:

Coloured Stone

Coral

Diamond

Ethics

Gemmological

Marketing & Education

Pearl

Precious Metals

Responsible Sourcing

The Commissions for Diamonds, Gemstones, Pearls and Precious Metals have collated the guidelines, which present the accepted trade practices for applying descriptions to these materials. It is in the best interest of all those concerned to be aware of them.

The Sectors and Commissions will propose changes in the standards, also known as the Blue Books, to the Executive Committee. After review the Executive Committee will submit the accepted proposals for adoption to the Board of Directors and if approved they will notify the assembly of delegates of the changes at the annual congress. Furthermore, it is our mutual responsibility to support these recommendations, which concern all professional people connected with diamonds, gemstones, pearls and precious metals. CIBJO Standards are subject to government regulations in the respective jurisdictions of CIBJO members.

The national umbrella organisation for each country represents, in principle, all the national trade organisations involved in the sectors mentioned above. This democratic structure, which has contributed to CIBJO's world-wide recognition also includes international trade and commercial organisations, it provides an international forum for the trade to collectively draw attention to issues and implement resulting decisions.

CIBJO Secretariat:

CIBJO, The World Jewellery Confederation  
Viale Berengario, 19  
20149 Milano, Italy

Tel: +39-02-4997-7098 / 7097 / 6187 Fax: + 39 02- 4997-7059

E-mail: [cibjo@cibjo.org](mailto:cibjo@cibjo.org)

Web site: [www.cibjo.org](http://www.cibjo.org)

## Introduction and Background

CIBJO's status on the Economic and Social Council of the United Nations (ECOSOC) enables it to represent the jewellery industry and present its strategy and objectives in support of the UN development goals. CIBJO's strategy in this respect is multi-layered. It serves to protect its constituents from factors that threaten the confidence of consumers in the jewellery industry, as well as factors that threaten the confidence of consumers in the jewellery product itself, and at the same time promote the jewellery industry, which creates sustainable economic and social opportunities in the countries and regions in which it is active.

CIBJO acts to uphold consumer confidence by supporting initiatives and programmes that address threats such as conflict diamonds and coloured gemstones; money laundering and the financing of conflict; questionable gemmological and assaying standards, and fraudulent hallmarks; health issues, particularly as they may arise in the mine or factory; damage to the environment; and employment practices, particularly where the hiring of children is involved. CIBJO's Responsible Sourcing Policy is intended as part of a "duty of care" for the jewellery industry supply chain and provides educational guidance for the industry.

The harmonisation of industry standards has been a critical element of CIBJO's mission, and has stood at the heart of its effort to protect the confidence of consumers in the jewellery product itself. To advance the goal of universal standards and terminology in the jewellery industry, CIBJO developed its "Blue Book" system, which involves definitive set of standards for the grading, methodology and nomenclature of diamonds, coloured gemstones, pearls and other organic materials, precious metals and gemmological laboratories. This Blue Book provides a universal framework for the responsible sourcing of materials in the jewellery industry supply chain.

To support responsible practices and the harmonisation of industry guidance and standards, CIBJO has built strong relationships with governments, civil society, industry, and trade organisations to ensure that the interests, reputation and the application of standards in the jewellery supply chains are taken into account. In particular, CIBJO has strong relationships with several organisations which issue guidance to the industry relating to responsible practices and standards (see list in Appendix 4.1), and which support and aim to advance responsible business practices among all sectors of the jewellery supply chain.

As part of CIBJO's Responsible Business Guides, this document outlines CIBJO's policy and practical recommended guidance for its members and for the industry relating to responsible sourcing, which are harmonised and recognised by leading advocates in government, international organisations, civil society and trade organisations, as well as among industry supply chain participants.

The CIBJO Responsible Sourcing Commission

December, 2018

# CIBJO RESPONSIBLE SOURCING POLICY

## 1. Scope of the Policy

CIBJO's Responsible Sourcing Policy ("the Policy") is a recommendation and guidance for the CIBJO membership and the greater jewellery supply chain, and is intended to provide a "duty of care" in the jewellery industry supply chains, recognising that the Policy will be implemented as a process of continuous improvement, and may vary considerably between different companies, supply chains and sectors.

The Responsible Sourcing Policy recommends guidelines and procedures which a participant in the jewellery supply chain may apply to provide assurance of responsible sourcing as far as possible through the member's supply chain.

The Responsible Sourcing Policy is guidance for responsible business practices and supply chain due diligence: it is not a system to address traceability of precious metals or gem materials to a mine source and cannot be described or interpreted as a chain of custody.

The Policy should be implemented in accordance with each company's supply chain circumstances. The Policy does not attempt to define the detailed methodology of due diligence, as this will differ from company to company and from sector to sector.

The Policy is a recommendation and is guidance to CIBJO members and the greater jewellery supply chain, and **does not constitute a standard or a compliance mechanism by CIBJO**. CIBJO recommends that members who would like certification or any other formal recognition of their implementation of the policy should do so through international standards organisations such as those mentioned in the Appendices to the Policy.

## 2. Challenges in the Jewellery Supply Chain

The CIBJO Responsible Sourcing Policy recognises that jewellery supply chains are highly fragmented, diverse and multi-layered, and that there are differing levels of sophistication between countries, supply chain sectors including precious metals and gemstones.

In particular, the Policy recognises that the supply chains for coloured gemstones are highly dependent on artisanal mining sources and small and medium-size enterprises ("SMEs"). Therefore, not all supply chains will be able to implement this guidance immediately. This guidance should be regarded as a "road map", based on principles of continuous improvement.

It is not expected that all companies will be able to implement the guidance immediately, nor comply with all associated standards and practices. It can be used as guide for continuous improvement in the demonstrable integrity of an individual company's supply chain through due diligence, according to the company's capacity.

## 3. The CIBJO Responsible Sourcing Policy

The CIBJO Responsible Sourcing Policy follows the Organisation for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, the Kimberley Process Certification Scheme and supports the United Nations Guiding Principles on Business and Human Rights. CIBJO expects that its members and companies following this guidance will follow all applicable country laws, including those relevant to responsible sourcing.

The OECD Due Diligence Guidance ([www.oecd.org/corporate/mne/mining.htm](http://www.oecd.org/corporate/mne/mining.htm)) clarifies how companies can identify and better manage risks throughout the entire mineral supply chain, from miners, local exporters and mineral processors to the manufacturing and retail companies that use these minerals in their products. The Guidance is applicable to all minerals and is global in scope. The Guidance is now referenced and used in regulations in the United States (“Dodd-Frank Act”) and serves as the basis for EU regulations on responsible mineral supply chains.

CIBJO requires that participants in the diamond supply chain also implement the WDC Industry System of Warranties Guidelines for diamonds.

CIBJO recommends to all its members that they undertake due diligence on their own supply chains in accordance with the OECD’s Due Diligence Guidance to ensure that these supply chains are responsibly managed.

The CIBJO Responsible Sourcing Policy recommends that the member company should (i) have a Responsible Sourcing policy in place and (ii) undertake due diligence on the company’s supply chain and use this due diligence to identify, assess and mitigate any identifiable risks.

### **3.1 Establish and Implement a Responsible Sourcing Policy**

All members should have a dedicated “compliance officer” who is responsible for establishing and implementing the company’s Responsible Sourcing policy, as well as for due diligence in the company and for reporting (if applicable). In many cases, especially for small and medium-scale companies, this “compliance officer” may be the owner of the company.

The member should have a Responsible Sourcing policy relevant to their scope of business, the precious metals and gem materials applicable to the business, and the complexity of the business’ supply chains. This policy should be appropriate for the business, and need not be complicated or detailed – but it should be very clear to suppliers and stakeholders, and implementation of the policy should be verifiable through transaction documentation.

Members should have documented terms of business with suppliers and policies and procedures in place that are in accordance with the company’s Responsible Sourcing policy. The compliance officer should establish and communicate to suppliers and external stakeholders the company policy for responsible practices through the supply chain, especially of precious metals (gold, silver and platinum group metals) and gem materials (diamonds, coloured gemstones and pearls).

Members should be able to demonstrate through transaction documentation that these terms of business and policies have been implemented throughout their business, through documentation such as invoices, warranty statements, delivery notes, product certificates, etc.

## 3.2 Supply Chain Due Diligence

Members should have a demonstrable due diligence procedure to understand and map their supply chains as far as possible, including clear identification of their own suppliers, “Know Your Customer/Counterparty” (KYC) details, terms of business and any proof of provenance of materials, such as precious metals refinery certificates, invoices, Blockchain verification, etc.

CIBJO members should have detailed understanding of who their suppliers are (e.g. through company registrations, company websites etc.), undertake “KYC procedures with these suppliers (see below), have written terms of business and as much documentation as possible on the provenance of products or materials. The company’s Responsible Sourcing and/or supply chain policy should be incorporated into contracts and/or agreements with all suppliers.

Through this due diligence, in most cases, members should be able to identify any risks in their supply chain, have a procedure to assess the possibility of adverse impacts of these risks, and be prepared to engage with counterparties to encourage them to take measures to mitigate or eliminate these risks.

As part of the understanding of the company’s supply chain, the company should undertake a risk assessment which is designed to identify any risks in their supply chain which may be contrary to the company’s Responsible Sourcing policy, where possible.

The company should also assess risks of any adverse impacts in the supply chains for each precious metal and gem material (for example, assess whether the supply chain for a precious metal or gem material may involve sourcing from an area of conflict).

If any risks are identified, the member company should design and implement a strategy and action plan to respond to these risks, and undertake more detailed due diligence on that supply chain. The action may include;

- a) Reporting findings of the supply chain risk assessment (as above) to the designated senior management of the company (if appropriate), even if the findings are that there are no identified risks.
- b) Devising and adopting a risk management plan. Devise a strategy for risk management, by either continuing trade throughout the course of measurable risk mitigation efforts, or temporarily suspending trade while pursuing ongoing measurable risk mitigation, or disengaging with a supplier after failed attempts at mitigation or where the company deems risk mitigation is not feasible or unacceptable.
- c) Implementing the risk management plan, monitoring and tracking performance of risk mitigation efforts, and reporting back to designated senior management.
- d) Undertake additional fact and risk assessments for risks requiring mitigation, or after a change of circumstances.

Depending on the member company’s position in the supply chain, and if the company has the capacity to do so, it is recommended that the company may carry out or support independent third-party verification or audit of supply chain due diligence at identified points in the supply chain.



Where possible, the company should report on their supply chain due diligence, for example on company websites, corporate social responsibility or annual reports.

### **3.3 Know Your Counterparty (KYC)**

Members should apply Know Your Customer/Counterparty principles (“KYC”) to their supply chains, which require businesses to establish wherever possible the identity of all organisations with which they deal, have a clear understanding of their business relationships and have a reasonable ability to identify and react to transaction patterns appearing out of the ordinary or suspicious.

These KYC principles should also apply to pre-existing or “grandfathered” stocks of precious metals and/or gem materials which may otherwise not be included in due diligence of current active supply chains through a reasonable ability to identify the sources of past supplies.

Examples of KYC procedures may include;

- i. Collection and analysis of basic identity information.
- ii. Name matching against lists of known parties (such as company registers).
- iii. Details of the member’s policies and procedures (especially relating to identification of sources of scrap/recycled supply).
- iv. Determination of the member's risk, especially in terms of propensity to supply precious metals and gem materials from an area of conflict and the trade of these products on a cash transaction basis.
- v. An expectation of a customer's transactional behaviour.
- vi. Monitoring of a customer's transactions against their expected behaviour and recorded profile.

Documentation relating to the application of KYC is recommended for all sources of recycled or “scrap” materials.

### **3.4 AML, Bribery and Facilitation Payments**

Members should establish policies that:

- a. Prohibit bribery in all business practices and transactions carried out by the member and by agents acting on behalf of the member.
- b. Protect Employees from any penalty or adverse consequences for identifying in good faith concerns related to suspected Bribery, for refusing to participate in Bribery, or refusing to pay a Facilitation Payment where Facilitation Payments are prohibited.
- c. Set the criteria and approval procedures to be followed by Employees in respect of the offer and/or acceptance of gifts with third parties.
- d. Train relevant managers and employees on policies and procedures.
- e. Record relevant gifts to and from third parties in a gift register, as per the member’s policy.
- f. Investigate any incidences of suspected bribery within their organisation.

Where facilitation payments are permitted by applicable law, members should:

- a. Undertake actions to eliminate all Facilitation Payments, or to reduce the size and frequency of Facilitation Payments over time.
- b. Ensure that any Facilitation Payments are of limited nature and scope.
- c. Implement controls to monitor, oversee and fully account for any Facilitation Payments made by or on behalf of the member.

Members should apply Know Your Counterparty (KYC, see above) principles for business partners that are suppliers or customers, including monitoring transactions for unusual or suspicious activity and reporting suspicions of money laundering or finance of terrorism to the relevant designated authority.

Members should maintain records of all cash or cash-like transactions which occur above the relevant defined financial threshold under applicable law and, where required, report these to the relevant designated authority.

### **3.5 Risk Management for “Conflict-Free” Sourcing**

Due diligence should aim to ensure that there is no direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of precious metals or gem materials used in supplies to the member. Members should take measures to evaluate their supply chains to identify any risks relating to conflict.

Direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of precious metals or gem materials includes, but is not limited to, procuring from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who;

- a: illegally control mine or manufacturing sites or otherwise control transportation routes, points where precious metals and gem materials are traded and upstream actors in the supply chain and/or
- b: illegally tax or extort money or precious metals and gem materials at points of access to mine or manufacturing sites, along transportation routes or at points where they are traded; and/or
- c: illegally tax or extort intermediaries, export companies or international traders.

Members can provide assurance of their risk management for “conflict-free” sourcing through certification with international standards and guidance (e.g. Kimberley Process certification for the risk of rebel group financing or conflict against governments for diamonds, LBMA Responsible Sourcing standards for precious metals).

### **3.6 Human Rights**

Members should ensure that they and their suppliers respect Human Rights and observe the UN Guiding Principles on Business and Human Rights in ways appropriate to their size and circumstances, including as a minimum;

- a: A company policy commitment to respect Human Rights as part of Responsible Sourcing,
- b: Include measures in the member’s due diligence process that seek to identify, prevent, mitigate and account for how they address their impacts on Human Rights,

c. Where members identify that they have caused or contributed to adverse Human Rights impacts, they shall provide for or cooperate in legitimate processes to enable the remediation of those impacts.

Members' due diligence on their supply chains should also verify that their own suppliers also follow these Human Rights and other due diligence requirements as set out in the OECD Guidance.

### **3.7 Product Integrity**

Members should ensure that the precious metals or gem materials and products through their supply chain are correctly and accurately represented and disclosed in accordance with the CIBJO Retailers' Reference Guide and/or the relevant CIBJO Blue Book, including providing certificates and other verification where applicable (e.g. diamond grading reports, gold purity/assay certificates).

### **3.8 Early Warnings, Grievances and Whistle-Blowing**

Members should have evidence of a company-level, or industry-wide, grievance mechanism as an early-warning risk-awareness system in their own or other supply chains. All grievances or reporting of identified risks should be treated in strict confidence by the member.

### **3.9 Responsible Sourcing Certification**

CIBJO's Policy is intended as practical guidance for CIBJO members and the greater jewellery supply chain; it recognises that industry participants can choose to have their responsible practices and supply chain due diligence verified and/or certified by external and independent standards and certification mechanisms such as the Responsible Jewellery Council (RJC), the Responsible Minerals Initiative (RMI), SCS Responsible Source Standard, the London Bullion Market Association (LBMA), amongst others.

It is also recognised that not all industry participants have the capacity to have their supply chains certified immediately according to industry guidance and standards, and for this reason has applied the continuous improvement principles outlined in this CIBJO Policy.

If a CIBJO member does wish to be certified or otherwise recognised in accordance with CIBJO's policy, CIBJO recommends that the member become certified by appropriate international standards organisations.

CIBJO provides a list of relevant standards and guidance as an Appendix to this guidance. This list may not be comprehensive and will be continually refreshed as part of CIBJO's guidance updates.

Members should include the CIBJO Policy and the company's due diligence procedures as part of the scope of the relevant certification.

CIBJO recommends that any certification for the schemes and standards as listed in the Appendix should be validated by independent third-party audit companies which specialise in responsible sourcing (examples are listed in the Appendices).

## **4: APPENDICES TO CIBJO RESPONSIBLE SOURCING GUIDANCE**

### **4.1 List of Standards, Guidance and Certification Organisations**

The lists below provide CIBJO members and industry participants with international standards and guidance organisations which can be used as references and support for the design and implementation of a company Responsible Sourcing Policy. The lists may not be comprehensive and industry participants and CIBJO members should use them as reference.

#### **4.1.1: GENERAL RESPONSIBLE SUPPLY CHAIN GUIDANCE AND STANDARDS**

##### **a: Organisation for Economic Cooperation and Development (OECD)**

OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas – see [www.oecd.org/corporate/mne/mining.htm](http://www.oecd.org/corporate/mne/mining.htm)

##### **b: Responsible Jewellery Council (RJC)**

RJC Code of Practices – see [www.responsiblejewellery.com](http://www.responsiblejewellery.com)

##### **c: Responsible Minerals Initiative (RMI)**

RMI responsible Minerals Assurance process – see [www.responsiblemineralsinitiative.org](http://www.responsiblemineralsinitiative.org)

##### **d: SCS Global Services**

SGS Global Services Responsible Metals, Mining and Jewellery - see [www.scsglobalservices.com](http://www.scsglobalservices.com)

##### **e: Jewelers Vigilance Committee (JVC) in USA**

Essential Guide Series – see [www.jvclegal.org](http://www.jvclegal.org)

#### **4.1.2: RESPONSIBLE SUPPLY CHAIN GUIDANCE AND STANDARDS FOR JEWELLERY INDUSTRY METALS AND GEMSTONES**

##### **a: London Bullion Market Association (LBMA)**

LBMA Responsible Sourcing programme [www.lbma.org.uk/responsible-sourcing](http://www.lbma.org.uk/responsible-sourcing)

##### **b: World Diamond Council (WDC)**

WDC System of Warranties – see [www.worlddiamondcouncil.org](http://www.worlddiamondcouncil.org)

#### **4.1.3: RESPONSIBLE SUPPLY CHAIN GUIDANCE AND STANDARDS FOR ARTISANAL SOURCING**

##### **a: Alliance for Responsible Mining (ARM)**

“CRAFT” Code of Risk Mitigation for ASM: see [www.responsiblemines.org](http://www.responsiblemines.org)

##### **b: Diamond Development Initiative**

See [www.ddiglobal.org](http://www.ddiglobal.org)

##### **c: Fairmined (gold)**

See [www.fairmined.org](http://www.fairmined.org)

##### **d: Fairtrade (gold)**

See [www.fairtrade.org.uk](http://www.fairtrade.org.uk)

**4.1.4 AUDIT COMPANIES SPECIALISING IN RESPONSIBLE SOURCING**

<b><u>Name</u></b>	<b><u>Website</u></b>
Bureau Veritas	<a href="http://www.bureauveritas.com">www.bureauveritas.com</a>
Figurad Bedrijfsrevisoren	<a href="http://www.figurad.be">www.figurad.be</a>
Intertek	<a href="http://www.intertek.com">www.intertek.com</a>
International Associates Ltd	<a href="http://www.ia_uk.com">www.ia_uk.com</a>
ISOQAR (India) Private Ltd	<a href="http://www.isoqarindia.com">www.isoqarindia.com</a>
QIMA (Quality Inspection Management)	<a href="http://www.qima.com">www.qima.com</a>
Resource Consulting Services	<a href="http://www.rcsglobal.com">www.rcsglobal.com</a>
SCS Global Services	<a href="http://www.scsglobalservices.com">www.scsglobalservices.com</a>
SGS	<a href="http://www.sgs.com">www.sgs.com</a>
UL Responsible Sourcing	<a href="http://www.ul.com/responsible-sourcing">www.ul.com/responsible-sourcing</a>

## 4.2 CIBJO Responsible Sourcing Checklist

Category		CIBJO RESPONSIBLE SOURCING CHECKLIST	Yes
3.1	Establish and Implement a Responsible Supply Chain Policy	Person responsible for the policy or "Compliance Officer" identified	<input type="checkbox"/>
		Responsible Sourcing Policy completed	<input type="checkbox"/>
		Terms of business/policies confirmed with suppliers and other stakeholders in accordance with the above Policy	<input type="checkbox"/>
		Policy included in transaction documents (e.g. invoices, delivery notes, product certificates etc.)	<input type="checkbox"/>
		Internal staff training completed where applicable.	<input type="checkbox"/>
3.2	Supply Chain Due Diligence	Supply Chain map completed	<input type="checkbox"/>
		Detailed understanding of all suppliers completed	<input type="checkbox"/>
		Risk assessment/identification of any risks completed	<input type="checkbox"/>
		Action plan in place to undertake more detailed due diligence if any risks are identified	<input type="checkbox"/>
		Findings of supply chain due diligence included in internal reports and external publications (annual reports, website etc.)	<input type="checkbox"/>
3.3	Know Your Counterparty	Written procedures for KYC in place	<input type="checkbox"/>
		Details of suppliers completed (examples in CIBJO Policy)	<input type="checkbox"/>
		KYC documentation in place for all recycled/scrap supplies.	<input type="checkbox"/>
3.4	AML, Bribery, Facilitation Payments	Policy in place to prohibit bribery, where possible	<input type="checkbox"/>
		Ability to identify suspicious transactions	<input type="checkbox"/>
		Records maintained for all cash transactions	<input type="checkbox"/>
3.5	Risk Management for "Conflict-free" sourcing	Evaluation of supply chain completed to ensure no risks relating to conflict	<input type="checkbox"/>
3.6	Human Rights	Human Rights included in Responsible Sourcing Policy	<input type="checkbox"/>
		Human Rights included in Supply Chain Due Diligence	<input type="checkbox"/>
3.7	Product Integrity	All materials accurately represented and disclosed in accordance with CIBJO guidance	<input type="checkbox"/>
3.8	Early Warnings, Grievances etc.	Grievance and risk-identification mechanism in place.	<input type="checkbox"/>
3.9	Responsible Sourcing Certification	Review relevant certification organisations	<input type="checkbox"/>