"Is Our Jewelry Company Sourcing Responsibly?"

20 Questions Company Officials Should Ask to Guide Action

Companies have a responsibility to ensure that they are not committing or contributing to abuses in their supply chains, by identifying, preventing, addressing, and remediating human rights and environmental impacts. This process is called human rights and environmental "due diligence" and has been spelled out in the United Nations <u>Guiding Principles</u> on Business and Human Rights and in a sector-specific <u>norm</u> for the mineral supply chain.

Jewelry and watch companies should conduct such human rights and environmental due diligence throughout their whole supply chain. The questionnaire below can serve as a simple first step for jewelry companies themselves and others, including investors, to understand a company's sourcing practice.

SUPPLY CHAIN POLICY	VERIFICATION AND GRIEVANCE MECHANISMS
 Does the company have a supply chain policy that sets out human rights requirements for the company and its suppliers? Is the company's supply chain policy based on and does it reflect international human rights standards, including UN human rights conventions and declarations, and International Labour Organization conventions? Is the company's supply chain policy publicly available? 	 9. Has the company undergone a third-party audit by qualified human rights and environmental experts to assess its human rights and environmental due diligence? 10. Did the audit include site visits and interviews with affected stakeholders throughout the supply chain? 11. Does the company require its suppliers to undergo third-party audits to assess their human rights and environmental due diligence? What is the scope of these audits and does the company acknowledge any limitations of such third-party audits? 12. Does the company supplement its third-party audit with worker- or community-driven monitoring methods? What are these? 13. Does the company have an accessible, reliable, and effective grievance mechanism that is designed through a participatory process, involving relevant stakeholders, and does it require its suppliers to have one?
TRACEABILITY	PUBLIC REPORTING – DUE DILIGENCE
 4. Does the company have full traceability along the whole supply chain for all or part of the gold, diamonds, and other minerals used in its jewelry, from mine to retail? 5. How large is the proportion of traceable material by volume of business? 	 14. Does the company publish sufficient and easily accessible information on its human rights and environmental due diligence efforts on its website? 15. Does the company's annual report regularly include information on its human rights and environmental due diligence efforts? 16. Does the company publish information on risks identified, non-coaudit summaries, non-compliances found, and measures taken to address risks or remediated impacts?
HUMAN RIGHTS ASSESSMENTS	PUBLIC REPORTING – SUPPLY CHAINS
 6. Does the company assess all human rights risks throughout the full supply chain, and how does it do so? For example, does it conduct regular risk assessments, including mine visits, by human rights experts? 7. Does it require suppliers to provide written evidence of human rights assessments conducted, risks identified, and mitigation measures taken? 	17. Does the company publish the names, addresses, and other relevant information of its direct suppliers and update it regularly?18. Does the company publish information regarding its mines of origin and update it regularly?
RESPONSE TO HUMAN RIGHTS RISKS	ARTISANAL AND SMALL-SCALE MINING
8. Does the company respond to all human rights risks throughout the full supply chain, and how does it do so? For example, does it have a risk management plan, a strategy and timeframe for mitigating risks through specific steps, goals for mitigation, and criteria for continuing, and responsibly suspending or ending engagement with suppliers that don't meet its standards?	 19. If the company sources material from artisanal and small-scale mines, what oversight mechanisms does the company have to determine these are upholding their rights responsibilities? 20. Does the company support initiatives to improve human rights and environmental conditions in artisanal and small-scale mines?