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### About the Watch & Jewellery Initiative 2030

The Watch and Jewellery Initiative 2030 was founded in 2022, by Kering and Cartier, delegated by Richemont. In May 2023, WJI 2030 was recognized by the Swiss authorities as an Association of Public Utility. WJI 2030 is a multi-stakeholder action platform that unites all players across the watch and jewellery value chain and enables them to lead progress and future-proof their businesses in an ever-changing regulatory landscape focusing in the areas of climate resilience, preserving resources, and fostering inclusiveness.

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# List of Acronyms

<b>AML</b>	Anti-Money Laundering	<b>JVC</b>	Jewelers' Vigilance Committee
<b>AGTA</b>	American Gem Trade Association	<b>KPCS</b>	Kimberley Process Certification Scheme
<b>ARM</b>	Alliance for Responsible Mining	<b>KYC</b>	Know Your Counterparty
<b>ASM</b>	Artisanal and Small-scale Mining	<b>LBMA</b>	London Bullion Market Association
<b>CAR</b>	Central African Republic	<b>LGD</b>	Laboratory-Grown Diamonds
<b>CCCMC</b>	China Chamber of Commerce and Metals, Minerals, and Chemical Importers and Exporters	<b>LSM</b>	Large-Scale Mining
<b>CIBJO</b>	World Jewellery Confederation (Confédération Internationale de la Bijouterie, Joaillerie)	<b>NGO</b>	Non-Governmental Organisation
<b>CRAFT</b>	Code of Risk-mitigation for Artisanal and small-scale mining engaging in Formal Trade	<b>OECD</b>	Organisation for Economic Cooperation and Development
<b>CSDDD</b>	The EU's "Corporate Sustainability Due Diligence Directive"	<b>OECD Minerals Guidance</b>	OECD Due Diligence Guidance for Responsible Sourcing of Minerals from Conflict Affected and High-Risk Areas. Sometimes also called the "OECD Due Diligence Guidance".
<b>DRC</b>	Democratic Republic of Congo	<b>OECD RBC</b>	OECD Guidance on Responsible Business Conduct
<b>EITI</b>	Extractive Industries Transparency Initiative	<b>OFAC</b>	US Office of Foreign Asset Control
<b>EC</b>	European Commission	<b>RBC</b>	Responsible Business Conduct
<b>ESG</b>	Environmental, Social, and Governance	<b>RJC</b>	Responsible Jewellery Council
<b>EU</b>	European Union	<b>RMI</b>	Responsible Minerals Initiative
<b>FATF</b>	Financial Action Task Force	<b>SBG</b>	Swiss Better Gold
<b>FH</b>	Fédération de l'industrie horlogère suisse	<b>SME</b>	Small and Medium-sized Enterprises
<b>FHH</b>	Fondation de la Haute Horlogerie	<b>UK</b>	United Kingdom
<b>G7</b>	Group of Seven advanced economies	<b>USA</b>	United States of America
<b>ICA</b>	International Colored Gemstone Association	<b>VPs</b>	Voluntary Principles for Security and Human Rights
<b>ICMM</b>	International Council of Mining and Metals	<b>UFBJOP</b>	Union Française de la Bijouterie, Joaillerie, Orfèvrerie, des Pierres & des Perles
<b>IRMA</b>	Initiative for Responsible Mining Assurance	<b>UN</b>	United Nations
<b>GIA</b>	Gemological Institute of America	<b>WJI 2030</b>	Watch and Jewellery Initiative 2030
<b>GRI</b>	Global Reporting Initiative	<b>WDC</b>	World Diamond Council
		<b>WGC</b>	World Gold Council

# Glossary of Responsible Sourcing Frameworks

The primary international frameworks for responsible business conduct that govern how to do responsible sourcing in jewellery supply chains are set out below. This guide seeks to simplify these frameworks and standards into an easy-to-use roadmap for jewellery SMEs. Do dip into them to help build your understanding, but as a small jeweller you can rely on this guide as a starting point to support you to gradually conform and so claim that you are sourcing responsibly.

**The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct<sup>1</sup>:** "are recommendations addressed by governments to multinational enterprises. They aim to encourage positive contributions enterprises can make to economic, environmental and social progress, and to minimise adverse impacts on matters covered by the Guidelines that may be associated with an enterprise's operations, products and services. The Guidelines cover all key areas of business responsibility, including human rights, labour rights, environment, bribery, consumer interests, disclosure, science and technology, competition, ... taxation, climate change, biodiversity, technology, business integrity and supply chain due diligence." The latest (2023) version of the Guidelines includes a new chapter on supply chain due diligence.

**The UN Guiding Principles for Business and Human Rights:** "are the global standard for preventing and addressing the risk of adverse impacts on human rights involving business activity, and they provide the internationally-accepted framework for enhancing standards and practices with regard to business and human rights." They include guidance on how to conduct human rights due diligence (risk management) in your business relations, including supply chains. They are referenced in the OECD Guidelines for MNEs and their supporting Guidances for responsible sourcing.

**The OECD Due Diligence Guidance for Responsible Business Conduct (OECD RBC Guidance)<sup>2</sup>:** Following on from the Guidelines for Multinational Enterprises, this Guidance "helps businesses to understand and implement due diligence for responsible business conduct. It also seeks to promote a common understanding on responsible business conduct amongst governments and stakeholders." This Guidance was developed further to the OECD Minerals Guidance as a generic guidance that is applicable to any sector, including minerals. It is more comprehensive than the Minerals Guidance on some aspects (e.g., the issues in scope for due diligence, accountability for due diligence procedure implementation, training and resource availability, tracking effectiveness, remediation procedures, extent of engagement of rightsholders, what should be reported on, etc.) whilst the Minerals Guidance goes into greater detail on how to respond to identified risks.

**OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Minerals Guidance)<sup>3</sup>:** "... recognises the private sector as a critical force and change agent that can influence the well-being of societies, and as bearing a particular responsibility when operating in or sourcing from conflict-affected and high-risk areas (CAHRRAs). By conducting due diligence and making informed purchasing decisions, the private sector can avoid contributing to serious human rights abuses, curtail revenue to armed groups and organised crime, and avoid links with financial crime. It can also help countries and communities benefit from their natural resources. The application of this Monitoring and Evaluation Framework will improve understanding of how due diligence is being implemented and if it is helping to achieve the aims of the DDG [due diligence guidance] – and, if not, why. The aim is to generate actionable data that can help stakeholders scale up what's working and address what isn't." Small jewellers can choose to implement the Minerals Guidance only, but those that are seeking leading practice can go beyond by seeking to align with the RBC Guidance.

**OECD Handbook on Environmental Due Diligence in Minerals Supply Chains<sup>4</sup>:** "was developed to help companies embed environmental considerations into their mineral supply chain due diligence procedures," and is intended to make it easier to put into practice the OECD RBC and Minerals Guidances in relation to managing environmental risks and impacts.

These five major frameworks have been interpreted into implementable *standards and guides* that support jewellery value chain businesses to claim and demonstrate that they conform with the key frameworks. We reference the leading ones for jewellery in Chapter 3.

# Glossary of terms

Term	Definition	Term	Definition
<b>Artisanal and small-scale mining</b>	<p>Artisanal and small-scale mining (ASM) refers to mining by individuals, families, or cooperatives with minimal or no mechanisation and often operating informally.<sup>5</sup> Global standards organisations usually note that "ASM occurs throughout the world but is particularly widespread in developing countries where it is an important source of income and livelihood."<sup>6</sup> The most commonly used definition for ASM comes from the OECD Minerals Guidance: "Formal or informal mining operations with predominantly simplified forms of exploration, extraction, processing, and transportation. ASM is normally low capital intensive and uses high labour intensive technology. 'ASM' can include men and women working on an individual basis as well as those working in family groups, in partnership, or as members of cooperatives or other types of legal associations and enterprises involving hundreds or even thousands of miners."<sup>7</sup></p>	<b>Continuous improvement</b>	<p>A commitment to steadily strengthening responsible sourcing practices over time, recognising that full implementation may not be immediately achievable, especially for SMEs. This principle, reflected in guidance such as the OECD Due Diligence Guidance and the 2025 CIBJO Responsible Sourcing Blue Book, enables companies to make measurable progress even when not yet fully aligned with best practice. Because gathering information from suppliers can be time- and resource-intensive, responsible sourcing should be seen as a journey built on consistent, incremental steps that lead to meaningful, long-term impact.</p>
<b>Business partner</b>	<p>"Entities with which a company has some form of direct and formal engagement for the purpose of meeting its business objectives. This includes but is not limited to contractual relationships. Examples include joint venture partners, vendors, franchisees or licensees, business customers, clients, governments, suppliers, contractors and consultants."<sup>8</sup></p>	<b>Day-to-day practices</b>	<p>Activities that an enterprise and its employees engage in on a daily basis.</p>
<b>Child labour</b>	<p>"Child labour is work that children should not be doing because they are too young, or if they are old enough to work, because it is dangerous or unsuitable for them. Whether or not work performed by children is defined as child labour depends on the child's age, the hours and type of work and the conditions in which the work is performed."<sup>9</sup> Not all child work constitutes "child labour".</p>	<b>Due diligence</b>	<p>Due diligence is the continuous process to identify, prevent, mitigate, and account for how an organisation addresses its actual and potential negative impacts.<sup>12</sup> It is an <i>ongoing</i> process of understanding these impacts, taking appropriate action to 'manage down' these risks to a level that is tolerable for the business and its stakeholders, tracking the effectiveness of these efforts, and communicating on these aspects to stakeholders.<sup>13</sup></p>
<b>Conflict diamonds</b>	<p>Narrowly defined by the KPCS as those diamonds that are financing armed conflict by illegitimate rebel groups.<sup>10</sup></p>	<b>ESG Issues</b>	<p>A broad framework used to assess a company's environmental, social, and governance performance, including risks and impacts (together referred to as "issues") that go beyond financial metrics. Investors and stakeholders often use ESG criteria and indicators to evaluate how responsibly a business operates.</p>
<b>Conflict-affected and high-risk areas (CAHRAS)</b>	<p>"Conflict-affected and high-risk areas are identified by the presence of armed conflict, widespread violence or other risks of harm to people. Armed conflict may take a variety of forms, such as a conflict of international or non-international character, which may involve two or more states, or may consist of wars of liberation, or insurgencies, civil wars, etc. High-risk areas may include areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure and widespread violence. Such areas are often characterised by widespread human rights abuses and violations of national or international law."<sup>11</sup></p>	<b>Greenwashing</b>	<p>Greenwashing is the "<i>misrepresentation, misstatement and false or misleading practices in relation to environmental, social, and governance credentials.</i>"<sup>14</sup></p>
		<b>Hazardous child labour</b>	<p>"Hazardous child labour is work in dangerous or unhealthy conditions that could result in a child being killed, or injured or made ill as a consequence of poor safety and health standards and working arrangements. It can result in permanent disability, ill health and psychological damage."<sup>15</sup> Any child work that takes place on a mine site is considered to be hazardous child labour due to the fact that mine sites are fundamentally hazardous.<sup>16</sup></p>

<sup>5</sup>GRI (2024)<sup>6</sup>Quote from GRI (2024). The OECD routinely uses similar language with regard to mining and mineral sourcing.<sup>7</sup>OECD (2016)<sup>8</sup>UNGP (2025)<sup>9</sup>United Nations (2012a)<sup>10</sup>KPCS (2017)<sup>11</sup>OECD (2016)<sup>12</sup>GRI (2024) Glossary. See also GRI's section 2.3 in GRI 1: Foundation 2021 for more information on 'due diligence'.<sup>13</sup>UNGP (2015)<sup>14</sup>Harvard Law School (2023)<sup>15</sup>ILO (2013)<sup>16</sup>ILO (2013)

Term	Definition	Term	Definition
<b>Human rights impacts</b>	A human rights impact includes any situation wherein business operations or activities have had an adverse or harmful effect on the human rights enjoyment of impacted rights-holders. <sup>17</sup>	<b>Responsible business conduct</b>	"Responsible business conduct (RBC) is about making sure that the activities of businesses and investors are aligned with the needs of society, today and in the future." <sup>23</sup>
<b>Human rights risks</b>	<i>"A business enterprise's human rights risks are any risks that its operations [including sourcing] may lead to one or more adverse [negative/ harmful] human rights impacts. They therefore relate to its potential human rights impact. In traditional risk assessment, risk factors in both the consequences of an event (its severity) and its probability. In the context of human rights risk, severity is the predominant factor. Probability may be relevant in helping prioritize the order in which potential impacts are addressed in some circumstances ... Importantly, an enterprise's human rights risks are the risks that its operations pose to human rights. This is separate from any risks that involvement in human rights impact may pose to the enterprise, although the two are increasingly related."<sup>18</sup></i>	<b>Responsible sourcing</b>	Responsible sourcing is the practice of procuring materials in a way that addresses the related economic, environmental, or social impacts across the supply chain. This definition comes from authoritative cross-industry organizations, the Responsible Minerals Initiative and the Global Reporting Initiative. <sup>24</sup> These organisations add: "[Responsible sourcing] can be done through a combination of measures, including policies, due diligence, and remediation. It can also mean making positive contributions in places where the sourcing is happening." <sup>25</sup> The 2025 CIBJO Responsible Sourcing Blue Book offers a complementary perspective by stressing that responsible sourcing requires looking at risks in both the supply chain (how and where materials are produced and moved) and the business partners involved.
<b>Mitigation</b>	"Actions taken to reduce the extent of the impact" or "to reduce the likelihood that a potential negative impact will occur." <sup>19</sup> Good supply chain due diligence will measure its success by the extent to which risk has been 'managed down' through the mitigation actions that have been taken. Did our mitigation actions reduce the risk of harm to people or nature?	<b>Risk-based approach</b>	A risk-based approach means (a.) prioritising putting attention and resources to those business relationships and tier 1 suppliers identified as high-risk based on the enterprise's (supply chain) risk assessment , and (b.) ensuring the enterprise's actions and response are proportionate to the business partner's risk level, with higher risk business partners requiring more robust risk controls and potentially greater investment, attention, and support.
<b>Provenance</b>	Provenance defines the primary origin of a material. Per the OECD Minerals Guidance, it includes Artisanal and Small-Scale Mining (ASM), Large Scale Mining (LSM) and recycling. Identifying the provenance means understanding where the mineral originates from (country of origin) and what transport routes it goes through (countries of transit). <sup>20</sup>	<b>Risk profile</b>	A description of any set of risks related to the whole organisation, part of an organisation, or an individual programme or project. <sup>26</sup>
<b>Red Flags</b>	A Red Flag is a warning of heightened risk <sup>21</sup> that prompts deeper due diligence by the enterprise.	<b>Salient ESG issues</b>	The risks and impacts that must be prioritized for management because they are both likely to occur and, when they occur, cause the most severe harms.
<b>Remediation</b>	<i>Remediation is repairing for a harm caused to the satisfaction of the victim, to the extent possible. Due diligence enables us to prevent and minimise harms, but where some harms still occur then remediation is expected to address the harm. The official definition is that remediation "refers to both the process of providing remedy for a negative human rights impact and the substantive outcomes that can counteract, or make good, the negative impact. These outcomes may take a range of forms such as apologies, restitution, rehabilitation, financial or non-financial compensation, and punitive sanctions (whether criminal or administrative, such as fines), as well as the prevention of harm through, for example, injunctions or guarantees of non-repetition."<sup>22</sup></i>	<b>Stakeholder</b>	Any individual or organisation who may affect or be affected by an enterprise's activities. <sup>27</sup>
		<b>Supply chain</b>	The network of organisations that cooperate to transform raw materials into finished goods and services for consumers.
		<b>Value chain</b>	<i>"A company's value chain encompasses the activities that convert input into output by adding value. It includes entities with which it has a direct or indirect business relationship and which either (a) supply products or services that contribute to the company's own products or services or (b) receive products or services from the company."<sup>28</sup></i>

<sup>17</sup>The Danish Institute for Human Rights (n.d.)<sup>18</sup>United Nations (2012b)<sup>19</sup>ILO (n.d.)<sup>20</sup>OECD (2016). Note that this definition varies from the draft definition proposed in the CIBJO Responsible Jewellery Supply Chain Lexicon at the time of writing (25/09/2025). At [The-Blue-List-The-Responsible-Jewellery-Supply-Chain-Lexicon-Draft-for-Public-Consultation.pdf](#)<sup>21</sup>Red Flags (n.d.)<sup>22</sup>ILO (n.d.)<sup>23</sup>OECD (2025)<sup>24</sup>GRI and RMI (2019). P.7. Adapted from the Responsible Minerals Initiative and the Global Reporting Initiative's definition.<sup>25</sup>UNDP (2025)<sup>26</sup>United Nations (2012).<sup>27</sup>United Nations Guiding Principles (2015)



# Foreword

At the Watch and Jewellery Initiative 2030 (WJI 2030), we believe that responsible supply chains will only be achieved when every business—regardless of size—is equipped, empowered, and supported to take meaningful action to integrate sustainability into their business strategy and day-to-day practices. Small and medium-sized enterprises (SMEs) form the backbone of the global industry. From independent retailers to artisanal workshops, these businesses represent more than half of all jewellery sales across Africa, Asia, Europe, and the Americas.

Responsible business practices are no longer a 'nice to have.' Increasingly, it is a business imperative, driven by fast-evolving regulations, shifting consumer expectations, and growing demands for transparency, responsible sourcing, and environmental accountability. However, while larger companies often have the internal capacity and dedicated teams to navigate these changes, SMEs are frequently under-resourced, overextended, and in need of tailored practical support.

This four-part guide has been developed specifically with SMEs in mind. It is designed to be practical, accessible, and immediately useful to entrepreneurs and small business owners. Our aim is to distil the core principles of responsible sourcing into an easy-to-follow roadmap—one that meets SMEs where they are and helps them move forward with confidence and clarity.

We also acknowledge that supply chain transparency and responsibility has evolved in recent decades. Millennials and Gen Z often want to understand the origins and impacts of the products they buy. This means that SMEs, regardless of where they operate in the value chain, are increasingly on the frontlines of these stakeholder expectations. With the right guidance and support, SMEs are not only capable of rising to this challenge—they are critical to achieving a more resilient, inclusive, and trusted industry.

This is a call to action: together, we can empower the change. Let us work together and take concrete steps to support SMEs and ensure that the watch and jewellery industry leads with purpose for today, and for generations to come.



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# Introduction to Conscious Craft: A Responsible Sourcing Guide for Small Businesses

In today's global jewellery market, consumers, investors, and regulators are increasingly asking: Where did this come from, how was it made, and how does one know that it is 'responsible'? For almost any small business, responding to these questions can sometimes feel overwhelming.

This Guide is meant to be **practical**. It will help you build the foundation for your responsible sourcing strategies and build your confidence in taking the next steps in your own supply chain.

This Guide is meant to be compact and to the point:

## Chapter 1

Discusses how we got here. This section is a brief explainer about how the very definition of 'responsibility' in jewellery has changed over the past 25 years, how, and why that happened. It links responsible sourcing to the broader societal expectation for 'responsible business conduct' so you get a clear and modern understanding of responsible sourcing in practice to guide your efforts today. It then introduces you to your '**Journey Map**', which is a fillable template that you will turn into your own individualised Plan for Responsible Sourcing that is based on your company's needs. When you finish this Guide, you will be able to act immediately.

## Chapter 2

This section demystifies and helps you map your jewellery supply chains. It identifies various responsible sourcing risks and the potential for positive impacts at each stage of the precious material supply chain from mine to consumer.

## Chapter 3

This section is full of practical advice on how to source responsibly, including specific response options for gold, coloured gemstones, and diamond risks in diverse supply chains. It provides real-world risk information in plain English. It then gives myriad ways for your company to manage these risks on your own terms.

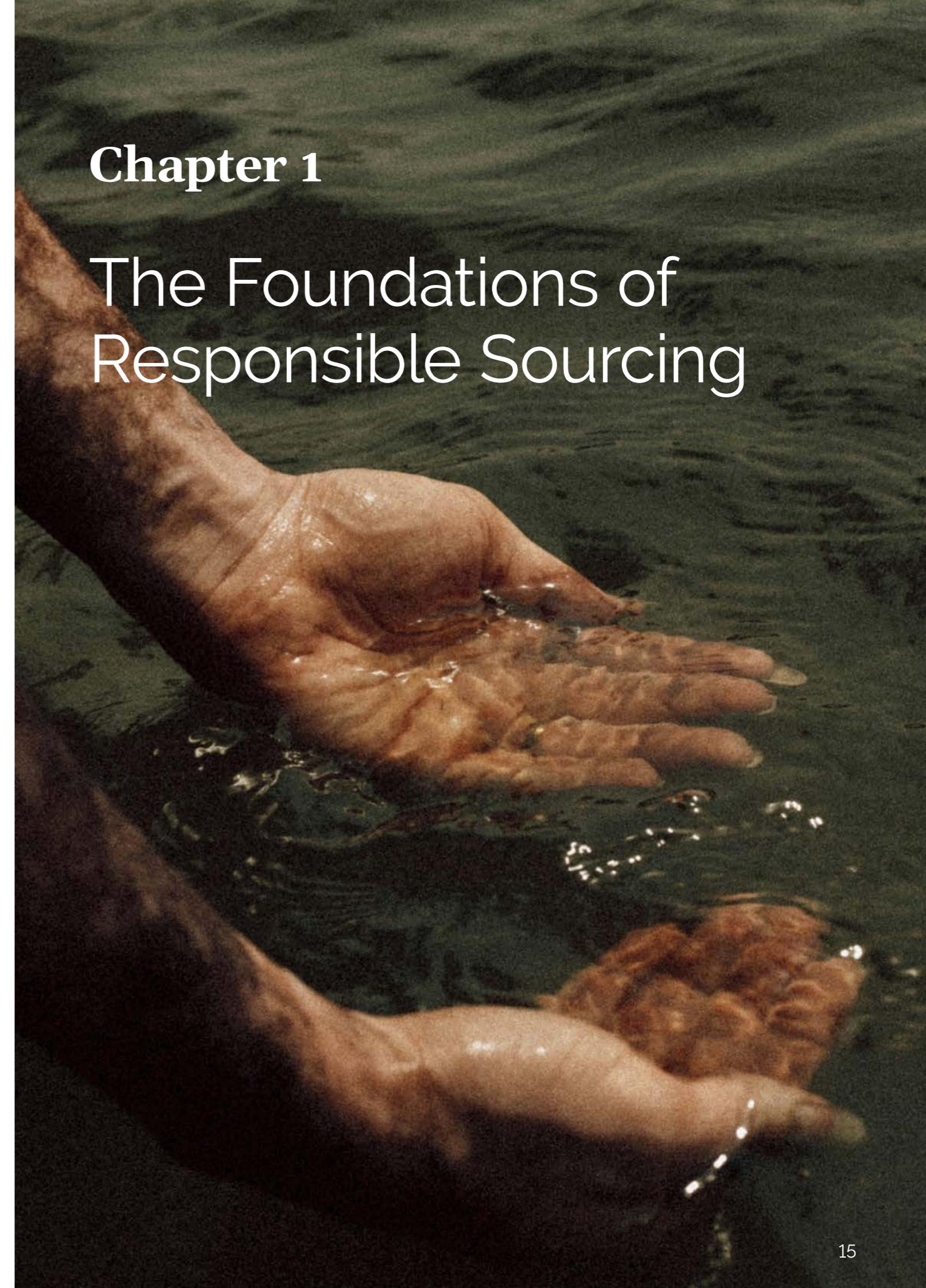
## Chapter 4

This final section wraps up by focusing on staying up to date with industry changes.

Ultimately, responsible sourcing is not just for big brands with large compliance teams. Whether you are sourcing diamonds, gemstones, gold, or silver — or working with 'artisan' or 'artisanal mining' partners — this course will guide you through the essentials, with real-world examples, case studies, and adapted tools for the busy entrepreneur and business owner. Let's get started!

# Chapter 1

## The Foundations of Responsible Sourcing



# Responsible Sourcing: Bringing “Responsible Business Conduct” to your supply chains

This guide is a supplement to the WJI2030 [Human Rights Navigator](#), an open-source tool that guides you on how to do human rights due diligence so you can control risks in your operations and business relationships (like suppliers, customers, bankers, etc.). In this guide we will dive deeply into controlling environmental, social (e.g. human rights) and governance risks – and driving positive impacts – in your supply chains.

Responsible sourcing is responsible business conduct (RBC) applied to your supply chains. It's what you do to make sure your suppliers are controlling risks in their operations and supply chains, and checking that their own suppliers are doing the same. Paying specific attention to controlling risks in your supply chains puts pressure on your suppliers to improve their business practices in line with global standards. When you choose to source from suppliers that are conducting business responsibly, you are also rewarding and thus incentivising responsible practices by giving them your business.

## What is RBC – and thus responsible sourcing – for?

Responsible business conduct delivers on society's expectation that businesses should conduct their affairs in ways that avoid and minimise harms and contribute to sustainable development, tackling global economic, social and environmental challenges. Over many years, governments have consulted business and impacted rights-holders to learn about how business impacts people and nature, for better or worse. They have negotiated and agreed a body of rules and recommendations that set out the actions businesses should take to ensure they and their business partners, like their suppliers, are operating in ways that limit harms and deliver positive impacts. We described the major frameworks upfront.

The benefits of RBC extend beyond general social and economic progress, however. By conducting business responsibly in line with these rules and recommendations your business will become stronger, more resilient and more likely to succeed, whilst motivating and supporting your business partners to do the same. In this way, RBC builds more sustainable societies for your workers, communities, customers, and suppliers because over time everyone is controlling risks better and contributing to positive impact.

This also commercially benefits you and your business partners because you avoid issues with your regulators, the playing field is levelled, responsible practices are normalised and you have less chance of being named and shamed for connection to a harm by media or NGOs.

Growing consumer awareness is accelerating the shift toward responsible sourcing. Buyers are increasingly concerned about social and environmental risks and actively seek transparent, responsible brands.

Media and NGO scrutiny is intensifying this pressure, making credible sourcing practices essential for competitiveness. Sustainability is also becoming a key purchase driver, with an estimated 20–30% of global jewellery sales influenced by sustainability-minded consumers.<sup>29</sup> You also build stronger business partnerships because you become better at sharing information and managing risk together.

This guide will help you to source responsibly so you can enjoy these benefits, whilst being reassured that through your businesses you are contributing to supporting sustainable development for the individuals and communities who have touched or been affected by the materials you are using in your jewellery.

## Top Tip!

We've included a list of acronyms and a glossary upfront along with an overview of the major responsible business conduct frameworks that guide businesses on how to source responsibly.<sup>29</sup> We suggest you start there, and, if you want to know more, the glossary will lead you to where to dig more deeply!

<sup>29</sup>CIBJO Responsible Sourcing Blue Book (2025) and “State of Fashion: Watches and Jewellery (2021), McKinsey & Company: <https://www.mckinsey.com/industries/retail/our-insights/state-of-fashion-watches-and-jewellery>

<sup>30</sup>There is a cross-industry effort to agree on common terms, such as origin, responsibility, etc. within the jewellery industry. That effort launched in early 2025 is being led by CIBJO and will be a multi-year effort. This Guide may be updated once that multi-year, multi-stakeholder effort concludes. In the meantime, the terms as defined in this Guide are generally accepted within the broader responsible sourcing community. Sources are cited appropriately. To keep track of the CIBJO efforts, go to: <https://cibjo.org/the-blue-list-review/>

## CHAPTER 1

# A Brief History: How We Got Here

Over time, regulators, consumers, and the investment community have expanded the 'responsibility' conversations from what the material is physically to whom is involved in the supply chain, where is the material from, and how it was mined.

Below is a timeline of key moments in recent history.

## Key Milestones in Responsible Sourcing in the Jewellery Sector

**1864**

UFBJOP - the French Union of Jewellery, Goldsmithing, Silversmithing, Gemstones, and Pearls (UFBJOP) is a trade union that brings together professionals from the industry - manufacturers and jewellery artisans, gemstone and pearl dealers, retail jewellers, jewellers, and goldsmiths - and represents them before public authorities as well as professional organizations

**1926**

The World Jewellery Confederation, known by its French acronym, CIBJO, is founded to promote consumer confidence in jewellery.<sup>31</sup>

**1982**

The FH - Fédération de l'industrie horlogère suisse was founded and today represents the culmination of nearly 150 years of associative activity within the Swiss watch industry.

**1983-1985**

The American Gem Trade Association (AGTA) issues rules to members around disclosures on heat treatments and modifications.<sup>32</sup>

**1987**

World Gold Council was established by global mining companies serving the gold market and its participants.

**1998-2000**

Nonprofit organisations such as Global Witness and Partnership Africa Canada (now Impact) release exposés linking diamond sales to conflicts in Angola, Sierra Leone, Liberia and the Democratic Republic of Congo (DRC).<sup>33</sup> Major mainstream press features followed, highlighting the issue for consumers.

**2000**

The Kimberley Process is established by southern African diamond-producing governments stop rough diamonds from being used to fund rebel groups attempting to overthrow legitimate governments. The Kimberley Process Certification Scheme (KPCS) would launch three years later.

**2000**

The World Diamond Council (WDC) forms to serve as the diamond and jewellery industry's official representative within the Kimberley Process. The WDC would launch its 'System of Warranties' in 2002 to promote industry self-regulation with administrative notes on business invoices noting the diamonds were Kimberley Process certified.<sup>34</sup>

**2002**

International coloured gemstone stakeholders take first-ever cross-industry actions addressing ethical concerns for priority-coloured gemstones. The Tucson Tanzanite Protocol aimed to protect the image of Tanzanite by promoting transparency in the trade following allegations of the trade's connections to terrorist financing.<sup>35</sup>

**2002**

Mining CEOs create the International Council of Mining and Metals (ICMM) to begin to focus on sustainable development issues.<sup>36</sup>

**2003**

KPCS is launched to prevent the flow of conflict diamonds. The definition of 'conflict diamonds' is narrowly defined as those diamonds that are financing armed conflict by illegitimate rebel groups.<sup>37</sup> Although limited in scope, the KPCS marks the first major industry-wide responsible sourcing initiative for jewellery based on origin and human rights concerns.

**2004**

The Alliance for Responsible Mining is founded.<sup>38</sup>

**2004**

Ethical Metalsmiths is launched to support small jewellers, primarily US-based, to implement ethics across their design and production systems. In 2025 the organisation changed its name to The Community for Ethical Jewelry.

**2004**

The No Dirty Gold Campaign is launched by EarthWorks<sup>39</sup>, which highlighted the serious human rights problems associated with gold mining, particularly related to the environment. It later issued its "Golden Rules" for responsible gold.<sup>40</sup>

**2005**

The World Bank's Communities and Small-scale Mining initiative hosts the first international conference on responsible sourcing of minerals from artisanal and small-scale mining in June in Washington, D.C. Ethical jewellery and ethical jewellery materials pioneers join to explore what support is needed to bring more responsible ASM products to market.

**2005**

The Responsible Jewellery Council (RJC) is founded by major jewellery companies to promote responsible business practices across the diamond and gold supply chain.

**2005**

The Diamond Development Initiative was founded to drive sustainable development through artisanal diamond mining in Africa. It began as an education, policy dialogue, and standard setting organisation. Partnership Africa Canada (now ImpactTransform), Global Witness, De Beers, the Rapaport Group of Companies, and the World Bank's Communities and Small-scale Mining programme were key partners in the inception of the initiative.<sup>41</sup>

**2005**

Founded by Audemars Piguet, Girard-Perregaux and the Richemont Group, the Fondation de la Haute Horlogerie (FHH) is a not-for-profit organisation that was established as a point of reference and neutrality for all subjects relating to watchmaking. It has since focused its mission on spreading the international influence of watchmaking culture and positions the watch as an object of art and culture.

<sup>31</sup>CIBJO (2025a)

<sup>32</sup>Bridges (2023) and AGTA (2016)

<sup>33</sup>Global Witness (n.d.)

<sup>34</sup>World Diamond Council (2022) and (2025).

<sup>35</sup>JCK (2002), Bridges (2023), JVC (2025), TJD (2025)

<sup>36</sup>ICMM (2025)

<sup>37</sup>KPCS (2017)

<sup>38</sup>ARM (n.d.)

<sup>39</sup>Earthworks (2013)

<sup>40</sup>EarthWorks (2025)

<sup>41</sup>Global Witness (2005) and Smillie, I. (2015)

## CHAPTER 1

**2007**

Fairmined and Fairtrade Standards for Gold and Platinum are born as a joint standard promoting social and environmental standards in mining. Shortly thereafter, the certified responsible gold would become available to jewellers.<sup>42</sup>

**2007**

The 'Madison Dialogue Ethical Jewellery Summit'<sup>43</sup> is convened at the World Bank in Washington D.C. in October, bringing together a diverse group of actors seeking to encourage "best practices in the gold, diamond, and other mineral industries by promoting communication and collaboration, sustainable economic development, and verifiable sources of responsibly mined materials."<sup>44</sup>

**2008**

The Tom Lantos Block Burmese JADE (Junta's Anti-Democratic Efforts) Act passed in the United States that prohibited the imports of Burmese jadeite and rubies due to the human rights atrocities committed by the Burmese military government. The law would be in effect from 2008 until 2016.<sup>45</sup>

**2008**

Scrutiny over money laundering increases on the global jewellery trade following a decision by the G7's Financial Action Task Force. Coupled with the 2004 US PATRIOT Act,<sup>46</sup> regulations on the jewellery sector begin to expand dramatically. Know Your Counterparty (KYC) and Anti-Money Laundering (AML) programs become required in the jewellery business in many countries.

**2010**

The US Dodd-Frank Wall Street Reform and Consumer Protection Act is passed, which affects jewellery materials gold and tungsten via its Section 1502. A similar EU law would pass in 2017. Taken together, these laws forced larger American and European companies and their supplier companies to implement the OECD Minerals Guidance. This meant they had to start tracing their supply chains to establish country of origin and the presence of 'red flags' that the most severe human rights and business integrity violations and abuses are not occurring in their supply chains of minerals being sourced from conflict-affected and high-risk areas.

**2010-2011**

The Organisation of Economic Co-operation and Development (OECD) issues landmark responsible mineral sourcing guidance for its 35 developed country members. The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Minerals Guidance) is published, is widely adopted, and eventually becomes the international baseline standard to help companies carry out their obligations.<sup>47</sup>

**2011**

The UN Guiding Principles for Business and Human Rights is unanimously endorsed by the UN Human Rights Council.<sup>48</sup> Known as the 'Guiding Principles', it states that companies have a responsibility to respect and protect human rights and make sure their activities do not contribute to harm and human rights abuses.

**2012**

The California Transparency in Supply Chains Act takes effect. It focuses on stopping child labour and modern slavery in retail and manufacturing supply chains, including jewellery.<sup>49</sup>

**2012**

The Sustainable Development Goals (SDGs) were born at the United Nations Conference on Sustainable Development in Rio de Janeiro in 2012. The objective was to produce a set of universal goals that meet the urgent environmental, political and economic challenges facing our world.

**2013**

The Precious Stones Multi-Stakeholder Working Group is convened in Paris at the OECD to explore existing and potential due diligence processes for precious stones supply chains.<sup>50</sup> The group commissions a report, which is published in 2015, and concludes that the precious stones industry at that time lacked the tools to do supply chain due diligence effectively.<sup>51</sup>

**2013**

Swiss Better Gold (SBG) was founded. As a non-profit organisation, the Swiss Better Gold Association is a pioneering network of industry, finance and other service providers which support the creation of responsible gold value chains from mine to market.

**2015**

China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCCMC) develops and launches the Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains.

**2015**

The UK Modern Slavery Act takes effect.<sup>52</sup> Similar to the California law, it includes a focus on forced labour and child labour in international business, including jewellery supply chains.<sup>53</sup>

**2016**

Jewellery Industry Summit and FairLuxury independently launch in the USA and Europe. Each group focusses on practical education on sustainability within the jewellery sector.

**2016**

AGTA expands its Code of Ethics and Fair Business Practice to emphasise transparency and due diligence regarding key social issues such as child labour. Members continue to self-attest regarding adherence to national laws.<sup>54</sup>

**2016**

AGTA begins to engage foreign governments on mineral sourcing using the OECD Minerals Guidance.<sup>55</sup>

**2017**

Impact Transform (formerly: Partnership Africa Canada) leaves the Kimberley Process due to a lack of meaningful assurance on the issues of conflict diamonds.<sup>56</sup>

**2017**

The French Devoir de Vigilance is adopted which requires large French companies to publish an annual vigilance plan in order to identify and prevent risks and impacts on human rights and the environment.

**2017-20**

New responsible mining standards and guidelines are released, including: The Initiative for Responsible Mining Assurance (IRMA), World Gold Council's Responsible Gold Mining Principles, and the CRAFT Standard for ASM.

<sup>42</sup>See longer article about the overall trend in responsible gold: JCK (2014)

<sup>43</sup>GIA (2007)

<sup>44</sup>CASM (2007)

<sup>45</sup>United States Congress (2007)

<sup>46</sup>Financial Action Task Force (2008)

<sup>47</sup>European Council (2025a)

<sup>48</sup>European Council (2025b)

<sup>49</sup>State of California (2010)

<sup>50</sup>Diamond World (2013)

<sup>51</sup>Sustainable & Responsible Solutions (2015)

<sup>52</sup>Voluntary Principles for Security & Human Rights (2015)

<sup>53</sup>GoUK (2015)

<sup>54</sup>National Jeweler (2016), AGTA (2016), and Bridges (2023)

<sup>55</sup>Bridges (2024)

<sup>56</sup>Impact Transform (2017)

## CHAPTER 1

**2018**

Human Rights Watch report, [The Hidden Cost of Jewellery](#), exposes widespread issues of child labour in gold mining and the lack of controls in the jewellery and watch industry.<sup>57</sup>

**2018**

The [WDC revises its System of Warrantees](#) and states that suppliers adhere to the WDC Guidelines, which include human and labour rights, anti-corruption, and anti-money laundering components. The statements remain self-regulatory. The [2020 edition](#) cites United Nations (UN) responsible business declarations and International Labor Organization guidelines.<sup>58</sup>

**2019**

[Australia's Modern Slavery Act](#) becomes law and affects jewellery supply chains. The Act is expanded in 2024 to deepen corporate responsibilities.<sup>59</sup>

**2022**

The [United States bans the import of Russian-mined diamonds](#) following Russia's invasion of Ukraine and the Russian Government's partial ownership of major diamond mines. In 2023-2024, the G7 would issue coordinated import controls and other measures.

**2022**

The [Watch and Jewellery Initiative 2030](#) is founded by Kering and Cartier to be a multi-stakeholder action platform across the watch and jewellery value chains. It supports companies drive progress and future-proof their businesses in a shifting regulatory and multi-stakeholder landscape.

**2023**

The [German Act on Corporate Due Diligence Obligations](#) takes effect. It focuses on corporate responsibility in global supply chains, from banning products (including jewellery) made with child labour.<sup>60</sup>

**2024**

Canada's [No Forced or Child Labor in Supply Chain Act](#)<sup>61</sup> becomes law and includes jewellery products.

**2024**

DeBeers announces [traceability information available](#) for all diamond products above 1.25 carats.

**2024**

The [EU and G7 bans the import of third-country Russian diamonds](#). Later that year, a traceability mechanism came into force.<sup>62</sup>

**2024**

The [EU Directive on Corporate Sustainability Due Diligence](#), which is known as the "CSDDD", comes into force. New rules are meant to foster sustainable and responsible corporate behaviour across global value chains. Companies are required to identify and address human rights and environmental impacts of their actions inside and outside Europe.<sup>63</sup>

**2025**

CIBJO updates its Responsible Sourcing Bluebook, initially published in 2019.

As this long history shows, responsible business conduct and responsible sourcing expectations in jewellery have shifted measurably since the early 2000s. In fact, WJI 2030 partner, ESG Book, estimates that responsible-sourcing relevant laws have increased more than 150% since 2010 alone.<sup>64</sup> While there may be the adjustment of laws in some places, the overall direction towards more transparency and due diligence continues strongly.

Most of the new responsible sourcing laws focus on how larger companies (such as those with 1,000 employees or more) practice and document their due diligence and materials sourcing.

However, in many cases, these requirements may eventually cascade and directly affect the small and micro-businesses in the jewellery sector. That means you.

This Guide will help you get ready for what is to come: formal reporting from regulators on the steps you are taking to make sure your own supply chain is truly responsible. (i.e., what you must do) It will also help you begin to communicate better with a curious consumer and be more proactive about your own sourcing practice to ensure it is full of integrity (i.e., what you choose to do for reasons of competition or values, etc.).



Photo © Stocksy

<sup>57</sup>Human Rights Watch (2018a)<sup>58</sup>WDC (2020) and WDC (2022)<sup>59</sup>GoAustralia (2018) and Moody's (2024)<sup>60</sup>GoGermany (2024)<sup>61</sup>GoCanada (2025)<sup>62</sup>European Commission (2025)<sup>63</sup>European Council (2025b)

## CHAPTER 1



# Responsible Sourcing in practice

Responsible Business Conduct and Responsible Sourcing Frameworks set out the "what" and the "how" of being a responsible business. Very simply put, to source responsibly you have to figure out:

**1. What** issues in your supply chains are of greatest importance or relevance to you and your stakeholders. These are the risks you're trying to control and areas you're trying to positively impact upon e.g., climate, nature, human rights, competition, disclosure, etc.

**2. How** to control risks in these areas through supply chain due diligence.

This Guide will help you do that so you can control the most important risks in your supply chains in line with good practice in supply chain due diligence for SMEs. We do this by helping you navigate where your materials are coming from, how to determine what risks are most important to you, and – based on this knowledge – how to start building your responsible sourcing journey and supply chain action plan.

And, once you've made good progress with your responsible journey for your jewellery materials, it will be time to start to act on the fact that responsible sourcing actually applies to *everything* you source! So when you are ready, you can take what you've learned and apply it to your other inputs, like your packaging, cleaning services, electricity and so on. But all in good time!

## Top Tip!

Environmental and human rights due diligence is at the heart of responsible business conduct and responsible sourcing because it is the practice by which we can control risks in our operations and business relationships (like suppliers, customers, bankers, etc.<sup>65</sup>) In this guide we will dive deeply into controlling environmental, social (i.e., human rights) and governance risks – and driving positive impacts – in your supply chains. But we recommend you implement this Responsible Sourcing Guide alongside WJI2030's Human Rights Navigator<sup>66</sup> and CSDDD Guidance Note if you are in scope for the CSDDD.<sup>67</sup>

# How to Start Your Journey: Using your 'Journey Map'

Experts in responsible sourcing often refer to the various steps therein as a 'journey,' because everyone's path must start somewhere and it takes time to complete. In this Guide, WJI 2030 provides you with a **Journey Map** to create your own action plan. As you complete each chapter of this Guide, you will add more steps to your plan in the corresponding section of the Journey Map. By the end of Chapter 3, you will have a full action plan ready to activate.

## Next steps:



### Complete Module 1 of your Journey Map

- ✓ You will determine if you will be on Track A or Track B in your Journey Map.
- ✓ You will learn the 'Tiers' of Supply Chain Mapping.
- ✓ You will map each of your priority materials of your small business.
- ✓ You will complete your Know Your Counterparty (KYC) assessment by Supply Chain Tier.



### Review the Supplier Survey Process and Sample Questionnaire that is located in this Guide's Annex 1.



## Additional Reading and Resources:

### Other tools:

*Conscious Craft: A Responsible Sourcing Guide for Small Businesses* builds upon other guidance from The Watch and Jewellery Initiative 2030 (WJI2030) that is relevant to controlling risks in your supply chains. Please consult our and others' tools to further deepen your learning and capacity for responsible sourcing:

- **The World Jewellery Federation (CIBJO):** CIBJO produced a Responsible Sourcing Blue Book in 2019, to guide its members and the industry at large on the policy and practices of responsible sourcing in jewellery supply chains. The Blue Book is currently undergoing revision in 2025.
- **Jewelers Vigilance Committee (JVC):** The JVC stays atop key developments in the global jewellery sector, with an emphasis on the American context.
- **National Association of Jewellers (UK) Better Business Pathway:** Take the health check and find out what your options are for Doing Right, Doing Well and Doing Good ; requires membership of the UK's National Association of Jewellers.
- **Responsible Jewellery Council:** The RJC has developed the Small Business Sustainability toolkit to break down industry jargon and support you in how you can tell your customers, employees and supply chain, the steps you're taking to put people and the planet first.

<sup>65</sup>WJI 2030 (2023) See the link here: <https://www.wjinitiative2030.org/rights-navigator/>

<sup>66</sup>WJI 2030 (2025)

<sup>67</sup>National Association of Jewellers (n.d.)

## Chapter 2

# Phases of the Jewellery Supply Chain & the Key Risks to Manage



Behind each jewellery piece is a winding supply chain of raw and semi-processed materials from multiple countries. Mining, mineral processing, component manufacturing, logistics and security create jobs for millions of people around the world. There are an estimated 45 million individuals working alone, in small groups or cooperatives, or in micro- and small-scale enterprises as part of the artisanal and small-scale mining sub-sector, as well as several million industrial mine workers, and many more millions of people processing materials, manufacturing components, and providing transport, housing, food and groceries, and other services to jewellery supply chain businesses.<sup>68</sup>

The main priority of responsible sourcing is to reduce harms to people and nature. Without some initial investigative work to determine your supply chains' origins, it is impossible to know whether your materials are contributing to human dignity or human harm, environmental crimes, grand corruption, or money laundering. We must first identify and understand the risks before we can proactively manage them.

Your responsible sourcing journey starts with you building your understanding of how your existing sourcing decisions may be contributing to harms for people and nature in your supply chains. This means you must map your immediate suppliers and their supply chains back to their origins and then seek to understand the risks at each supply chain tier. This mapping includes from the mine, mineral processing, trading, jewellery manufacturing, and retail sales.

As you do this, it is important to recognise that the industry is moving beyond relying solely on written guarantees or warranty statements. While these can still be part of commercial documentation, they are no longer considered sufficient on their own. You are increasingly expected to seek out meaningful information about the conditions and circumstances in your supply chains, especially where risks may be present, and use this to inform your responsible sourcing decisions both proactively and reactively.

### Top Tip!

Although it is impossible to understand whether your business is connected to positive impacts or to harm without identifying where a gemstone or metal comes from, don't worry if you can't get transparency on all of your supply chains – take action on what you can find out and what's likely to be true, and work to improve your visibility over time.

## CHAPTER 2

## LET'S BEGIN.

# Understanding each Material's Risks and Impacts

The following chart illustrates the typical stages of precious minerals in jewellery supply chains and the types of risks that are most common.<sup>69</sup>

Please note the [Human Rights Navigator](#) can guide you on how to do a more in-depth analysis of supply chain risks.<sup>70</sup>

## Supply chain risks

Phase	Potential Risks	Potential positive Impacts
 Raw Material Mining Local Trading for artisanal & small-scale mining)	<b>Industrial mining:</b> corruption, environmental harms <sup>71</sup> (like deforestation; pollution of air, water, soil; biodiversity loss, water use, etc.); human rights harms esp. related to Indigenous rights, women & children's rights, community health, occupational health & safety, gender-based violence, etc. <b>ASM:</b> as for industrial mines plus conflict financing, money laundering, smuggling, hazardous child labour, modern slavery.	<b>Industrial mining:</b> skilled jobs in urban and rural areas; may substantially contribute to national GDP & FX stabilising currencies and/or developing national economies; main driver of economic development in rural areas; may slow environmental harms from uncontrolled informal activities in important ecosystems. <sup>72</sup> <b>ASM:</b> Skilled, semi-skilled, and unskilled local mining jobs in rural areas, support industry services (machine rentals, banking, restaurant jobs, etc. Families fed and educated and supplementary livelihoods capitalised by mining income.
 For Metals: Processing (likely to be done at the mine site for industrial mines) & Refining Diamonds & Coloured Gems: Cutting & Polishing	Environmental harm (especially pollution, water use and climate impacts for metals); occupational health & safety (and community health risks for metals), sexual harassment; money laundering, fraudulent product labelling (i.e., designating conflict gold as 'recycled')	Skilled jobs in urban and peri-urban areas; potential contributions to a growing middle class
 Regional & International Trading	Transparency, money laundering, fraudulent product labelling (i.e., co-mingling gemstones or diamonds from different localities and fraudulently labelling them).	Economic development contributions to these manufacturing and trade hubs
 Jewellery Makers & Manufacturers	Occupational health & safety risks, environmental harm, human health risks, modern slavery risks, sexual harassment risks, fraudulent product labelling	Skilled jobs in urban and peri-urban areas; jobs in support & service industries; potential contributions to a growing middle class
 Services & Retail	Fraudulent product labelling, sexual harassment, discrimination	Local economic development and service industry jobs

<sup>69</sup>This risk chart has been adapted from "WJI: An Introduction to Industry" p.47. Unpublished PPT.

<sup>70</sup>WJI 2030 (2023)

<sup>71</sup>OECD (2023)

<sup>72</sup>The World Bank (2019a and b)

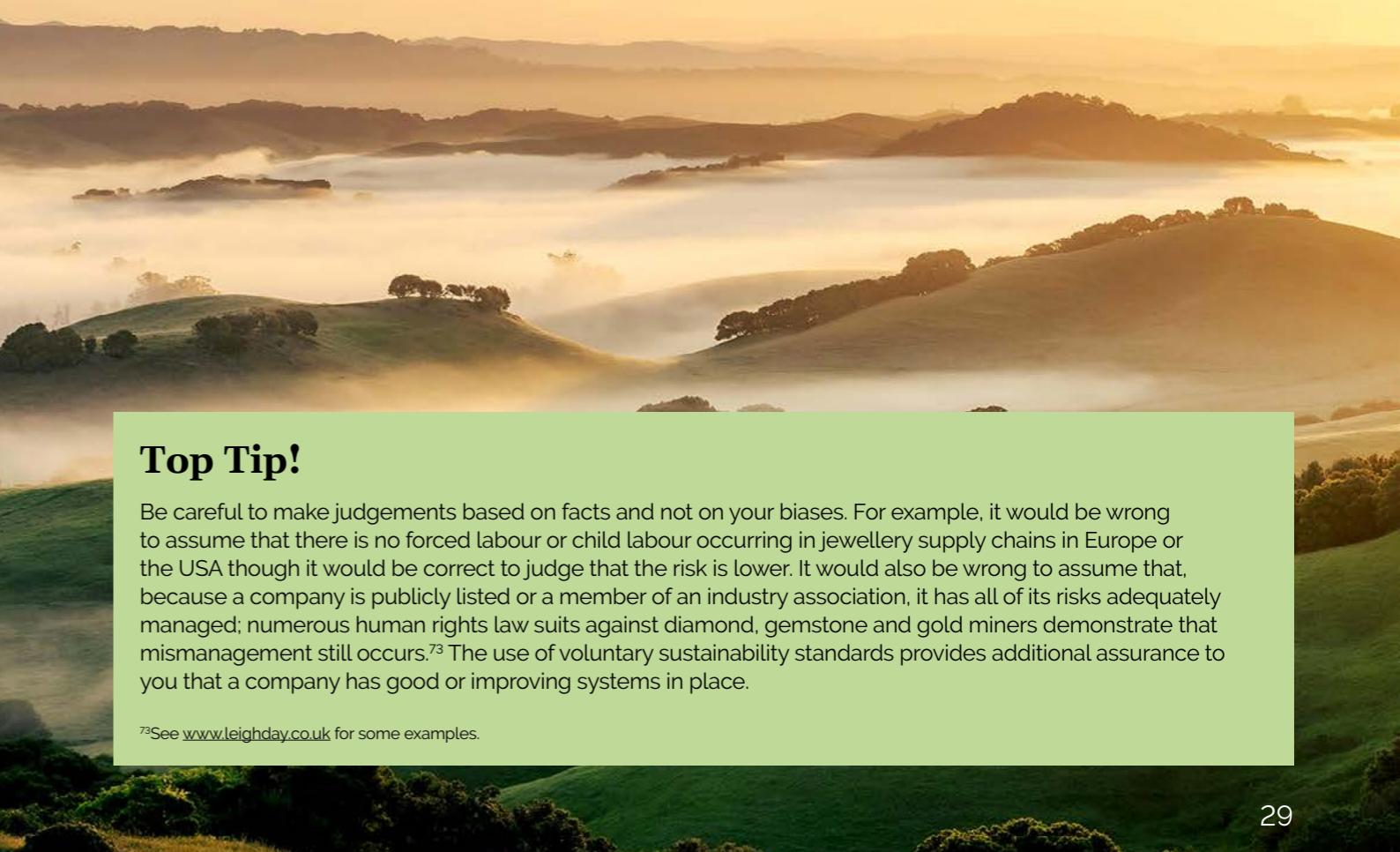
Remember that the risk level for each supplier will be affected by:

**Where** the business activity happens (risks are higher in certain places due to culture, political stability, the quality of governance of mineral sectors, and ecosystem sensitivity).

**How** it is done (what scale and type of mining, processing or manufacturing).

**Who** is doing it (how professional and organised the owner/operator is).

**What** accountability measures the company must respond to. For example, risks will usually be lower when the company is publicly listed (because it is more likely to have ESG disclosure obligations), is a member of an industry association (because there are criteria to be able to join), is implementing and assured against a voluntary ESG standard, and/or is operating in a more developed jurisdiction where the legal framework has higher ESG standards and is enforced, etc.



## Top Tip!

Be careful to make judgements based on facts and not on your biases. For example, it would be wrong to assume that there is no forced labour or child labour occurring in jewellery supply chains in Europe or the USA though it would be correct to judge that the risk is lower. It would also be wrong to assume that, because a company is publicly listed or a member of an industry association, it has all of its risks adequately managed; numerous human rights law suits against diamond, gemstone and gold miners demonstrate that mismanagement still occurs.<sup>73</sup> The use of voluntary sustainability standards provides additional assurance to you that a company has good or improving systems in place.

<sup>73</sup>See [www.leighday.co.uk](http://www.leighday.co.uk) for some examples.

## CHAPTER 2

Each phase of the jewellery supply chain carries unique risks and potential benefits, and jewellery companies have a professional—and often legal—responsibility to conduct due diligence in order to identify, assess, and manage these risks. Early-stage due diligence can mean collecting simple supply chain information, asking basic questions of your supplier, and then following up if the answer does not make sense or is problematic. **Module 2 of your Journey Map** walks you through this process. Please note that more in-depth coverage of the OECD Minerals Guidance can be found in WJI2030's Human Rights Navigator.

### Top Tip!

**Use your practice of supply chain due diligence to strengthen trust with your suppliers.** For many years the jewellery industry has operated on the principle of 'trust'. Deals were often made without contracts and on a handshake alone with the threat of reputational harm motivating actors to operate ethically and with integrity. Supply chain due diligence provides a more formal means for building confidence that your business partner is indeed trustworthy and operating ethically. Responsible sourcing moves us from a position of "no questions asked and no news is good news" to "lots of questions asked and appreciation for honest disclosure of challenges and progress".



Ultimately, it is your responsibility to conduct due diligence on the materials that your business touches and sells. Conducting due diligence on your materials is the only way to understand whether your suppliers—as your business partners—are really upholding the values that you promise your customers. Due diligence on jewellery materials is one way that the jewellery sector can maintain consumer confidence, trust in the sector, and ultimately protect product value.

### → NEXT STEP

# Understanding the Existing Risks & Potential Impacts of Your Specific Supply Chain

In your Journey Map's Module 1, you have already begun mapping the **mined origin** of the semi-processed and finished materials that are most important to your business. We started with the materials of biggest business value because: (1) you likely know these materials or products the best; (2) you likely buy a lot of it; and (3) you are likely frequently in touch with the suppliers of these goods.

In Module 2, you will now research and note the various **supply chain-related risks** in your own supply lines. You will note the risks and potential impacts on local people, environments, and livelihoods (economies).

### Next steps:



#### Complete Module 2 of your Journey Map

- ✓ Begin to map your own supply chain's potential risks.
- ✓ Reflect on your level of control in the supply chain.
- ✓ Begin to learn management steps to respond to risk and create opportunity for positive impact.



## Chapter 3

# Moving from Knowledge to Action



The most important part is next, which is starting to act on the information that you have gathered. Too many companies either act without information (so may actually have low impact) or stop at the data-gathering phase because: (1) they may have become overwhelmed with the issues, or (2) they are not sure how to respond, particularly as small businesses.

### → NEXT STEP:

## Creating a Responsible Sourcing Supply Chain Policy

A Responsible Sourcing Policy serves several purposes. It can help frame the way your business makes sourcing decisions, prioritises suppliers, systematically avoids risks contrary to its values, or copes with ambiguous situations. It can also help you communicate with customers. A responsible sourcing policy can show your commitment to ethical practices, can build trust with customers, and can help you manage supply chain risks... if it is implemented. So, make sure that what you create is meaningful and usable by you and designated members of your team. However, please be forewarned: publishing a policy that is not followed is an example of modern greenwashing.

If you tell consumers and staff that you have a policy and you abide by it, please make sure you yourself have evidence that you are following it. If not, you could find yourself with reputational damage or a law suit.

Annex 2 of this Guide helps you Create a Responsible Supply Chain Policy.

## CHAPTER 3

# Moving forward with Confidence: Managing Risk and Amplifying Opportunities

Here we provide guidance on how to identify and manage risks in gold, diamond and coloured gemstone supply chains.



## Gold

This metal is at the heart of the jewellery industry. It contributes to the livelihood of tens of millions of miners worldwide.<sup>74</sup> However, it also carries many human rights, environmental, business integrity, and reputational risks, including things like child labour<sup>75</sup>, forced labour<sup>76</sup>, violation of community and Indigenous rights<sup>77</sup>, and excessive violence by security forces.<sup>78</sup>

It has some unique or highly significant risks too. For a start, gold that is mined at an artisanal or small-scale level is often purified by processing it using toxic substances like cyanide or mercury. If not controlled professionally, use of these chemicals present severe health risks, not just to the processors, but to their communities and biodiversity, and – in the case of mercury – to people all over the world through food chains. Ideally you should be sourcing only from mines that are assured as conformant with the International Cyanide Management Code, and that do not use – or are part of a programme to eliminate the use of – mercury.

Secondly, gold is treated like money in many jurisdictions which means that it is commonly used for conflict financing, money laundering, and moving “money” (gold) across borders to avoid scrutiny. These risks are particularly prevalent in informal ASGM supply chains, though it’s also an issue for high-value coloured gemstones and diamonds. Some examples of recent gold-related conflict are in eastern DRC<sup>79</sup> and the Sahel.<sup>80</sup>

Industrial gold mining, if not undertaken responsibly and in accordance with established standards, can pose a significant risk of pollution to air, water and soil through sulphur emissions and acid rock drainage. It also generates large volumes of waste. Sourcing from industrial miners that have robust environmental management systems is essential.

Lastly, unlike diamond and precious stones, gold is in scope for supply chain due diligence regulations like the EU Conflict Minerals Regulation and the US Dodd-Frank Act. However, small jewellers will not come into scope for the EU regulation (only companies importing over 100kg of metal are in scope) and only listed companies would be in scope for the US Dodd-Frank Act.<sup>81</sup>

<sup>74</sup>World Gold Council (2025)

<sup>75</sup>The ILO Convention No. 182 on the Worst Forms of Child Labour; United Nations Convention on the Rights of the Child; the ILO Convention No. 138 on Minimum Age for Admission to Employment

<sup>76</sup>Human Rights Watch (2018a)

<sup>77</sup>WRI (2020)

<sup>78</sup>IGF (2022) <https://www.iisd.org/system/files/2022-09/illicit-financial-flows-conflict-artisanal-small-scale-gold-mining.pdf>

<sup>79</sup>Harris, G., Kibalya, E., and Gruber, L. (2025)

<sup>80</sup>Munshi, N. (2021)

<sup>81</sup>LBMA 2021 and European Commission (n.d.)

CHAPTER 3 

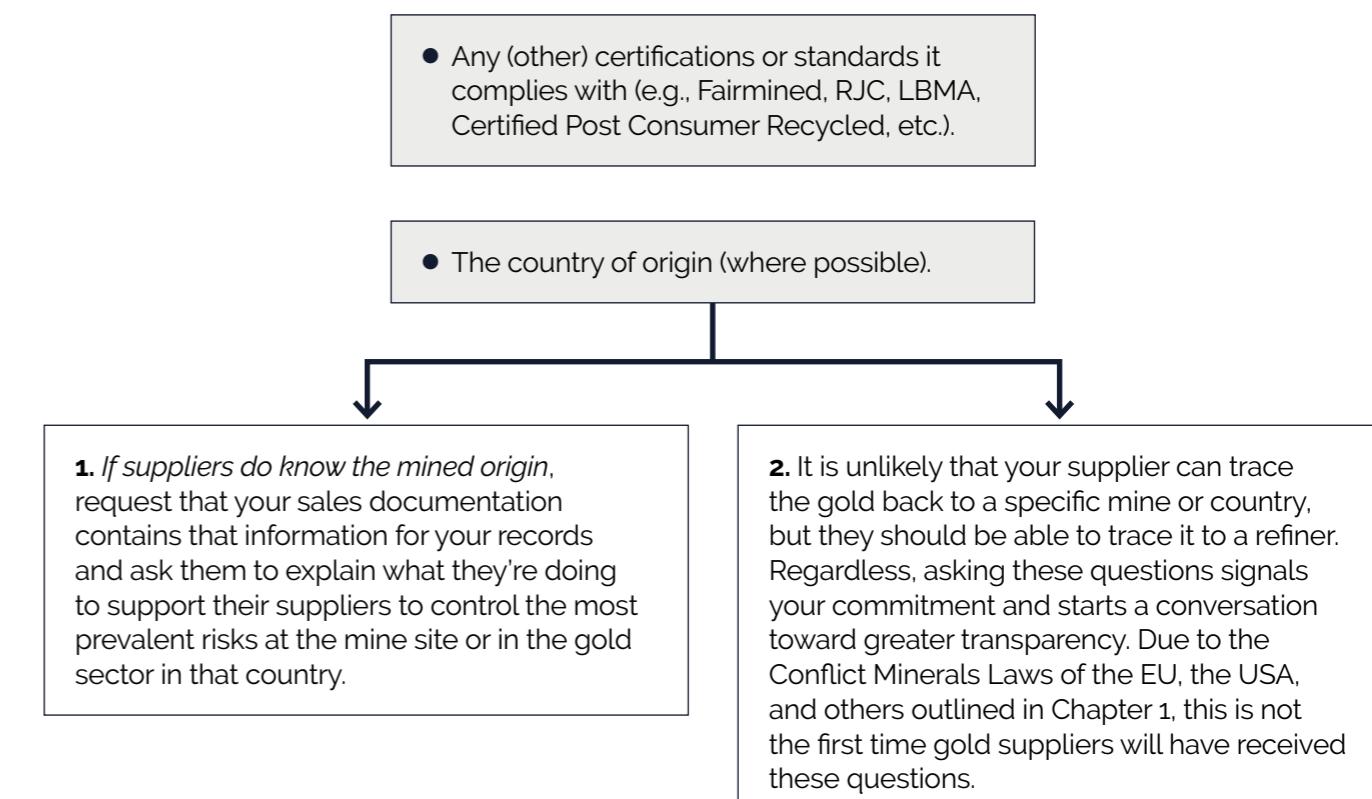
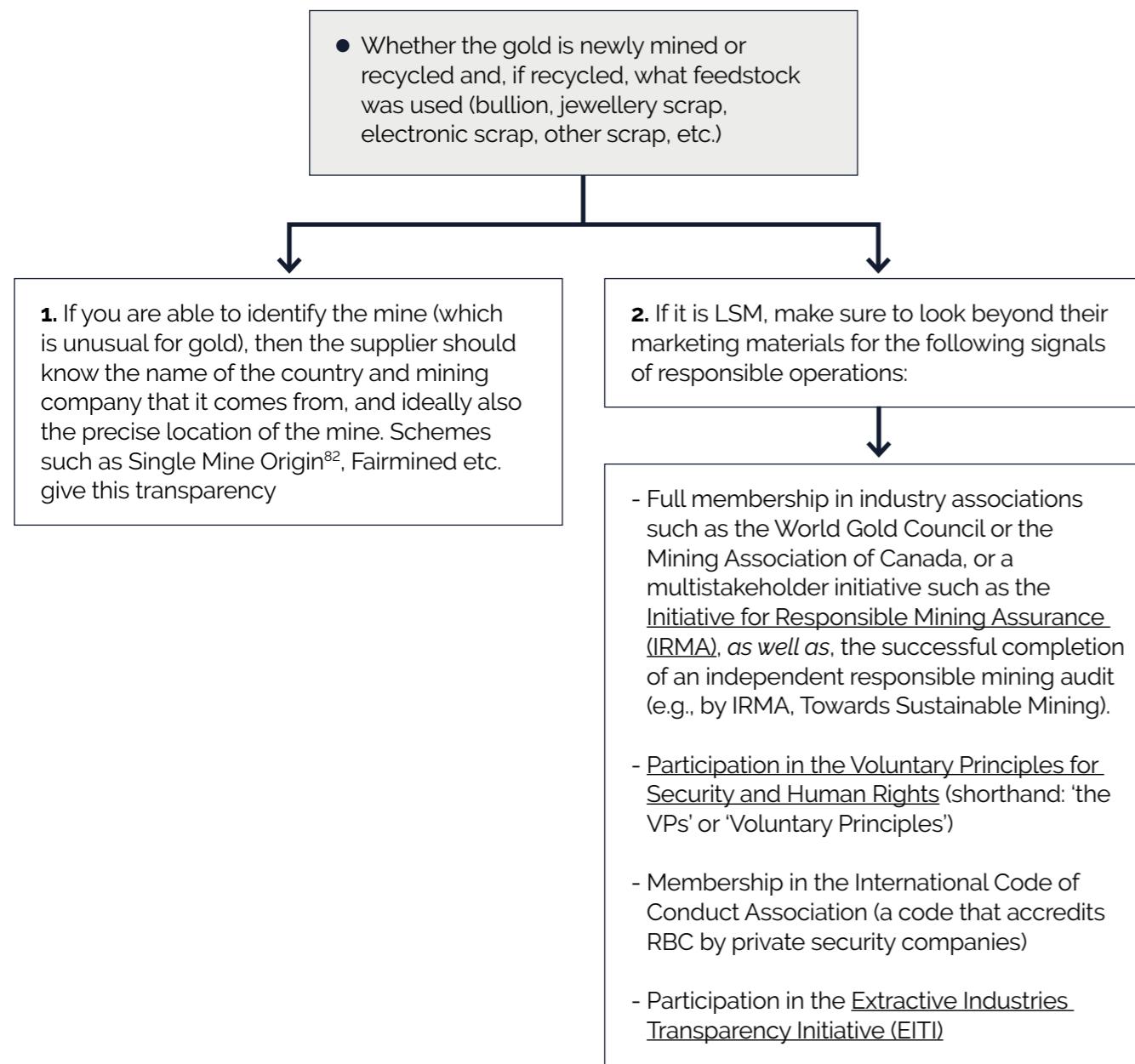
## Here are some ways forward to consider:



## Document and understand where your gold comes from

Using the Supplier Questionnaire in Annex 1, or via other ways: ask your suppliers detailed questions about the origin of the gold they provide.

Request that your sales documentation identifies:



<sup>82</sup>Single Mine Origin (2025)

## CHAPTER 3



### Identify the Gold Refiner and see if it is on an approved list of gold refiners taking extra due diligence precautions

Using the Supplier Questionnaire in Annex 1, or via other ways, take note of the Gold Refiner that your supplier uses. Get this information and the location of that refiner in writing. Next, check to see if that refiner is on the LBMA Good Delivery List or if it is RJC Certified.

- LMBA Good Delivery List: Refiners on this list undergo additional background checks and adhere to the London Bullion Market Association (LBMA) Good Delivery Rules that include protocols against terrorist financing, money laundering, and human rights abuses.<sup>83</sup>
- RJC Certification List: Cross check with the Responsible Jewellery Council.
- The Responsible Minerals Initiative (RMI) maintains a combined, online list of vetted gold refiners. They also draw from the LMBA and RJC lists for gold. The RMI lists other jewellery relevant metals refiners as well, such as silver and copper refiners here.

If the gold is coming from a refiner that is not part of any of these responsible sourcing programmes, get more information on why not, what other forms of assurance they can provide on responsible sourcing and the extent to which these conform with the OECD Minerals Guidance (as a minimum). Make sure you're comfortable with their situation before you agree to start or continue to do business.



### Be vigilant about recycled claims.

Not all gold that is sold as recycled is truly post-consumer, harvested from waste, or is truly reused from something else. The practices within the recycled gold sector remain an ongoing source of tension within the responsible sourcing movement because of accusations of labelling and import/export fraud, use of recycled gold for money laundering, and greenwashing.<sup>84</sup> Therefore if this topic truly matters to you, pay close attention to definitions that are increasingly used by key industry bodies, such as the definition of recycled gold now included in the RJC's chain of custody standard or scheduled for publication in CIBJO's revised Precious Metals Blue Book.<sup>85</sup>



### Consider Responsible ASM Gold

In specific instances and contexts, gold from demonstrably responsible ASM sources can help support and sustain community development, helping drive social change. To ensure certain social and environmental criteria are met to allow the gold to be identified as potentially 'responsible', the following programmes provide good reference points to guide your purchasing decisions.

- Fairmined Gold
- Fairtrade Gold®
- PeaceGold™
- Gold that is produced as part of the Just Gold initiative.
- Gold that is produced as part of a CRAFT Scheme
- Gold that is produced as part of the Swiss Better Gold initiative

These steps — taken together — help ensure your gold is less likely to contribute to environmental harm, conflict financing, or human rights abuses and may even be mostly doing good in the world.



## Coloured Gemstones

The precious stones themselves can be transparent and bright, but the supply chains are commonly opaque and shrouded in secrecy. One reason for this is because 70-80% of coloured gemstones are mined by ASM and traded by small family businesses. These SMEs commonly operate in jurisdictions where they receive minimal support to conduct business responsibly and where it may be commercially impossible to operate in ways that are fully formal. Further, local and international gemstone traders often hide their source information because of fear that they will be cut out of the supply chain by others wanting to source directly. Other times, it is because they may have made financial investments in a particular mine, and they do not want others to source from their long-term investment. Yet, other times, nefarious traders may hide or obscure origin for a variety of reasons and to expand their bottom line.<sup>86</sup>

For these reasons, it is harder to identify and manage risks in coloured gemstone supply chains without intentionally sourcing from traders that position themselves — and can evidence that they are — ethical.

The coloured gemstone sector struggles with additional challenges. Many of the most important gemstone provenances are in sites of high conservation value, including but not only in protected areas, (e.g., Brazil, Colombia, DRC, Madagascar, Mozambique, Myanmar) and / or where democracy is weak and human rights are more systematically violated. In such contexts, environmental, social and governance risks are more likely, as is conflict. For example, fairly recent flashpoints for conflict related to coloured gemstones have been in Colombia and Mozambique.<sup>87</sup> There are occasionally complex child labour concerns in coloured gemstone mining and manufacturing,<sup>88</sup> and evidence of human rights abuses and conflict between industrial gemstone mines and local communities. Some traders will treat gemstones in order to enhance the colour and value, but without declaring this.

However, coloured gemstones — due to the fact that the majority of gemstones are mined by small groups of individual miners, or by small businesses — are also a class of jewellery materials that, if they can prove to have been produced and distributed responsibly, may also be **full of human storytelling potential**.



<sup>83</sup>LBMA (2025a) and LBMA (2025b)

<sup>84</sup>Impact Transform (2025) and ARM (2019)

<sup>85</sup>Impact (2025)

<sup>86</sup>the Global Initiative Against Transnational Organized Crime (2020) and GIA (2016)

<sup>87</sup>InsightCrime (2024) and Global Initiative Against Transnational Organized Crime (2021), p. 29.

<sup>88</sup>Verite (2025) and GIA (2016)

CHAPTER 3 

## Here are some ways forward to consider:



Ask your supplier if your coloured gemstones are most likely ASM or LSM in origin. It's a bit different to gold and diamonds because there are so few industrial mines in the gemstone sector.

- If it is LSM, then the supplier should know the name of the mine that it comes from, the country and precise location of the mine, and they should have specific written documentation for the gemstones.



- Make sure they list this information on your sales receipts and provide you copies of the related documentation for your business records.
- You can reuse the specific information about the mine for your customer inquiries and for your website content.

- If it is LSM, make sure to look beyond their marketing materials for the following signals of responsible operations:



- Full membership in the [International Council on Mining & Metals \(ICMM\)](#), the Responsible Jewellery Council (RJC) or with the [Initiative for Responsible Mining Assurance \(IRMA\)](#). If IRMA: they should have successfully completed and passed an IRMA audit, which are public.
- Participation in the [Voluntary Principles for Security and Human Rights](#) (shorthand: 'the VPs' or 'Voluntary Principles')
- Membership in the International Code of Conduct Association (a code that accredits RBC by private security companies)
- Participation in the [Extractive Industries Transparency Initiative \(EITI\)](#)

- If there is no documentation from a registered LSM mine, then you should presume that your coloured gemstones are ASM in origin. Documentation from a coloured gemstone trading house does not substitute for LSM documentation.



#### Understand What Country Your Coloured Gemstones Come From

- Ask your suppliers questions about the origin of the gemstones that they provide. Documenting gemstones' mined origin is a request that many gemstone dealers are only recently receiving. Like diamonds, for many years, wholesalers would only list where a gemstone was cut and transformed into a faceted gemstone or bead. As a result of that practice and a lack of systems, many wholesalers will not have true knowledge on the mined origin of most of their materials. Honesty is fine but fraud is not. Some suppliers may state that it is 'impossible' to determine gemstone origin. It is not impossible to determine country of mined origin; the supplier just might not have the systems or willingness to do so. And for larger stones, you may also opt to have a gemstone laboratory provide an expert opinion on mined origin; options could include the Gemmological Institute of America, the Gübelin Gem Lab, ICA | Gemlab, Swiss Gemmological Institute, amongst others. However, if suppliers are open to a journey of their own, perhaps it may be one that you can take together.

- *If suppliers do know the mined origin*, request that your sales documentation contains that information for your records and ask them to explain what they're doing to control the most prevalent risks in the gemstone sector in that country.
- *Be very careful if your gemstones are coming – or could likely be coming from – a sanctioned country or entity, like Myanmar.*



#### Choose Centre or Side Gemstones of Known Origin and Design Around Them.

- In luxury jewellery, it is often the design that is conceptualised first, and then the appropriate gemstone is selected. This existing process has innate inefficiencies, but it is tradition in many fashion houses. However, as responsible expectations gain greater importance, it may be time to shift the way design is done. A more efficient process, and one that aligns with the realities of natural coloured gemstone production, is to first select one's perfect responsible gemstone and *then* create an inspired, bespoke design. For larger collections, responsible supply chain initiatives offer traceable centre stones, side stones, and colour melees. The last category, colour melee, can service small capsule collections or even larger collections that you might want to try out.



#### Consider Responsible ASM Coloured Gemstones.

- The vast majority of coloured gemstones come from diverse ASM communities. An expanding number of worthy initiatives have emerged to source from responsible miners. (Note that each initiative or brand may have its own definition of responsibility. Make sure to inquire).

**Special note:** In the coloured gemstone industry, it is important to appreciate that many coloured gemstones are "legacy" material and are of unknown origin. This is because coloured gemstones are often kept as collectors' items or in stock. Much of this stock was compiled long before the shift in expectations for businesses to source responsibly. For your own customers, just be transparent and note the materials' history, the shift in practice in the sector, and what you are doing now.

## CHAPTER 3



# Diamonds

These precious stones can be products of billion-year-old natural processes or made by people (and machine). Whether your diamonds are natural or laboratory-grown, both segments of the diamond market have due diligence issues to navigate.

With laboratory-grown diamonds (LGD), the environmental impacts of their creation can be concerning depending on the energy source on which the laboratory relies. Unlike natural diamonds, which are extracted through mining or collecting from a seabed, LGDs are created in high-tech manufacturing environments.

These methods require significant energy inputs—often derived from fossil fuels—raising concerns about their carbon footprint, particularly when production occurs in countries with coal-heavy energy grids. Further, it is common for manufacturers and others to avoid disclosure about the precise LGD production facilities, which can contribute to greenwashing.

However, there has also been energy innovation within some aspects of the LGD industry.<sup>89</sup> Due diligence and disclosure help you as the client to understand what claims you may be able to make. In general, however, because LGD rely on machines, it is impossible to state that they are entirely 'mining-free.' Tread carefully with environmental or ethical claims unless they are backed by verifiable data and evidence.

Natural diamonds face similar due diligence risks as do other mined and collected materials. These include environmental, human rights, and conflict risks that can only be acted upon once mined origin is established through traceability and disclosures. Natural diamond is uniquely positioned for nearly full transparency in its supply chains because of the dominance of larger-scale mines (LSM) in diamond production; approximately 80% of all natural diamonds come from LSM sources, with the remaining supply coming from ASM producers.<sup>90</sup>

However, part of the due diligence challenge for both consumers and downstream companies purchasing finished natural diamonds is the lack of disclosure from wholesalers on natural diamond's country of mined origin, and ongoing confusion over the term 'conflict free.' Despite traceability breakthroughs and laws requiring mined-origin disclosures,<sup>91</sup> many diamonds are only labelled with the country where the diamond was 'substantially transformed.' That is, where it was cut and polished. This lack of disclosure of mined origin by some mid-chain producers thwarts those seeking reliable information about the conditions and impacts of diamond mining and may limit the consumer's confidence in the total ethical quality of the diamond. An absence of reliable information prevents action in those cases. Fortunately, there are others in the mid-chain that will provide reliable information. Your challenge as an SME is to find suppliers that will disclose the data that you seek.

The other major due diligence challenge facing natural diamond is the disconnect between the 'conflict-free' wording on the Kimberley Process certificates and what the KPCS definitionally guards against. After many unsuccessful rounds of reform attempts to broaden the group's definition of 'conflict', the Kimberley Process still only guards against a tiny number of modern-day situations. It does not address all forms of conflict, and nor does it provide assurance that human rights risks in the diamond supply chain are being managed in line with international responsible business conduct and responsible sourcing standards. It is therefore unsurprising that some consumers are sceptical at 'conflict free' claims.

This is why it's risky for a jewellery to present their diamonds as "conflict-free". With only a minority of diamond being mined and traded in/from countries that are excluded from the KPCS, and given the narrow definition of conflict in scope for Kimberly Process assurance, it is potentially misleading to label diamonds as "conflict-free".<sup>92</sup>



## The following are some ways forward:



### Understand Where Your Diamonds Come From.

While some suppliers may not reveal the diamond's mined origin, others will. Attaining fully traceable diamonds is considered best practice due to the prevalence of sanctioned materials in the supply chain.<sup>93</sup>

Request that your sales documentation from your supplier:

- Identifies whether the diamond is newly mined, 'reused' (inherited or from an estate), or LGD.

- Confirms that the diamond(s) are not Russian in mine origin due to ongoing sanctions. Be aware that diamonds mined in Russia may be polished elsewhere (e.g., India) and relabelled. This is why request mine-of-origin specific labelling is critical.
- Confirms the diamonds are in compliance with the Kimberley Process.
- Notes any certifications or standards.
- Lists country of origin.

<sup>89</sup>JCK (2019) and IGI (2025)  
<sup>90</sup>Inter-Governmental Forum / IGF (2018)

<sup>91</sup>National Jeweller (2025)  
<sup>92</sup>See also CIBJO (2025b), section 4.1, and RJC (2024), chapter 14.  
<sup>93</sup>Rapaport (2024)

## CHAPTER 3

# What to do if due diligence gets complicated or confusing?

There are some general principles that can help you ensure you are sourcing responsibly, regardless of which materials you're managing. These rules will help you make decisions that you can defend as 'responsible' in relation to how you source your materials and control risk in your supply chains. They summarise and simplify some of the core principles in the major RBC and responsible sourcing frameworks.

## Five Rules for Better Due Diligence Decision-Making

1

### You can't eliminate all risk!

Responsible sourcing frameworks recognise that it is not possible for businesses to eliminate all risks. So instead, supply chain due diligence supports you to strengthen your business to be able to avoid risks and cope with those that remain. It does this by building your awareness of the risks and ability to manage them. Once you are stronger, confronting risks becomes less challenging. Therefore, your goal is to put in place the controls that will reduce your supply chain risks to a tolerable level.

2

### Abandon perfection! It's all about progress!

The global standards for RBC and responsible sourcing insist that the highest goal is to demonstrate *continuous improvement* towards global leading practice. Companies that aim for perfect supply chains may be controlling risks to their own business, but are doing little to address risks for some of the most vulnerable people in jewellery supply chains. Don't be afraid to be honest about what's hard with your customers, and always tell them what you – and the wider jewellery community – are doing to improve this; this will build trust.

Putting these at the heart of your due diligence practice will build your confidence in knowing that you're doing the right thing each time you're confronted with a decision on how to handle a risk. So, keep these rules in mind as you proceed to do due diligence on each of your materials, and each of your supply chains.

### Top Tip!

You will always have to tolerate a degree of risk. What you have to do is figure out which risks you can and will tolerate and which you'll simply avoid (e.g., by changing material or supplier). When you're considering a specific situation that appears to hold risks you are not sure about, it might help if you think about the following:

- **What is your relationship to direct or indirect harms to rights-holders?** How much risk are you connected to through your supply chain relationships? Can you honestly say you've done all you could to reduce these harms to people and nature?
- **How risky is this connection for your business?** How much risk is your business facing as a result of these potential and actual harms to people and nature in your supply chains?
- **Do you have any ability to reduce these risks?** Do you and your suppliers have the right policies, procedures, people, and funds to manage those risks down to a level that would be acceptable to you, your key stakeholders and the affected rights-holders? If not, what makes it ok to stay engaged with that supplier or supply chain? Can you comfortably defend this decision to your stakeholders and still maintain their trust?

3

### Prioritise by taking a risk-based approach.

Do what matters most, either it's because it's a business imperative, such as a legal requirement, or because it's your riskiest material or the issue that most worries you. Judge what merits attention by assessing all the issues, prioritizing which to act on, and then ensuring you can justify your actions. Then check it's working and adjust your approach if not.

4

### Don't overstate what you are achieving!

Be careful to only make claims that you can back up with evidence. There is a growing body of law across many jurisdictions that tackle greenwashing and false sustainability claims. For greater guidance, check out the NAJ Guidance note for environmental claims<sup>94</sup> and Chapter 14 (Claims) of the RJC's Code of Practices.<sup>95</sup>

5

### Be pragmatic

Money and time are precious; you can't do everything all at once! And as a small business you have to also do what is feasible and focus your efforts where you really can make a difference. This is why prioritisation and continuous improvement are so important.

### Top Tip!

"Taking a risk-based approach" sounds a bit confusing, doesn't it? So think about it through the following lenses.

- **First take action on what you must do** (based on your regulatory requirements and voluntary commitments), and then move to what would be good to do (aligned with your values and market positioning). And consider tying what would be *good* to do (i.e. philanthropic actions, charitable donations, consumer awareness-raising campaigns, etc.) to a.) addressing those materials with risks that you are struggling to avoid or minimise and then b.) maximising benefits from what you, your customers and/or suppliers are most passionate about.

- **Start with the most important risks.** Make sure you prioritise taking action on the riskiest suppliers or materials, and then on the most *salient* ESG issues in your supply chains. (Salience is a measure of likelihood x severity: i.e., which risks are *most likely* to occur, and, if they were to occur, would have the most severe impacts). Remember you have to balance what is important to affected rights-holders, your stakeholders and your own commercial needs and values. Start with those risks that are high across all three domains, and gradually move to lower level risks once you are making progress to get the priority issues under control.

- **Follow the 'mitigation' hierarchy.** To the extent possible prioritise preventing a harm, and if you can't do that then minimise it as much as possible, and then for any residual harm you should offset and remedy it. So, for example, if you have no choice but to source gemstones from the open market without any assurances of responsible business practices, then consider how you might spend a little time or money to help one piece of that gemstone's world improve its transparency, traceability or sustainability to contribute to overall progress. Think about the guidance on carbon management – we should try to avoid flying, but if there's no other option and we simply must travel, then we remedy that situation by offsetting the harm through accredited carbon offsets.

<sup>94</sup>National Association of Jewellers (2024)  
<sup>95</sup>Responsible Jewellery Council (2024)

## CHAPTER 3

## Five Rules for Meaningful Stakeholder Engagement as part of Due Diligence

The second set of rules is about relationship management, because supply due diligence should benefit both business partners. Some companies get this wrong because they're only thinking about risk to themselves. But responsible business conduct laws and expectations require businesses to also take into account how their actions, or inactions, pose risks to others. Be guided by the true intent of responsible sourcing –due diligence means incentivising and, where necessary and possible, supporting your business partners to become more resilient and to better control their own ESG risks.

1

**Partner, don't police!** It's bad practice to dictate and insist a supplier does what you say without being willing to support them to improve if you are able. And, let's be honest, if you're not an important customer then they probably won't listen to you anyway. Instead, look for mutual benefit from addressing risks, and find ways to make each other stronger as a result. This means taking a listening and learning disposition, providing a hand (e.g. access to information, introduction to an expert who can help, etc.) to support their continuous improvement. But do remember to be pragmatic – you can't partner every supplier, so pick the one or ones where you really feel you can make a difference.

2

**Continue to do business with the suppliers in the highest-risk places but only if they can demonstrate that they are doing – or working towards doing – due diligence** (e.g., through implementation of the CRAFT Code). The primary reason the OECD Minerals Guidance was created was to allow downstream businesses to keep doing business with mineral producers in conflict-affected and high-risk areas because responsible trade has a stabilizing affect on fragile economies and societies. So it's ok to stay engaged with such suppliers, but only if you have the right appetite for risk and ability to control those risks (i.e., to influence and/or support your supplier to improve), and can explain this ongoing engagement to your customers. For most SMEs this will be a tall ask, but some are doing it. If, however, the harms are so severe and you have no possibility of influencing the supplier to improve their practices, then it's probably time to switch supplier. But stay in touch; they might make a shift in due course anyway.

3

**Maximise tangible benefits to your stakeholders** through how you do due diligence. Maybe an action you decide to take to minimise a harm could be done in a way that also brings a positive impact too? Bravo. This will really give you something to be proud of (and promote to your customers!)

4

**Be open to evolving your practices and taking advantage of industry developments.** While some things may continue to stay the same, others must shift, particularly when there may be a future demand for real evidence of due diligence and proactive risk management. Unlike in the 1990s, there are now evidence-based solutions for issues once thought of as 'impossible', such as tracking and tracing melee diamonds. There are also myriad initiatives already underway with which to connect or contribute. We have flagged some of these above.

5

**Go meet your suppliers.** Besides building trust and strengthening your relationship, visiting your supplier will deepen your understanding, empathy and thus ability to work together to address risks. It will also give you authentic experiences to share with your customers.

## CHAPTER 3

## Top Tip!

Here are some handy questions and answers to help you make the right choices that would be considered to be responsible:

**Where should I focus my efforts and why here?**

Answer: where you are connected to the greatest potential and actual harms, you are most exposed, and have the greatest potential to reduce the risk level for you, your suppliers and affected rights-holders.

**What should I delay or ignore, and why?**

Answer: those risks where the risks are less severe and less likely to happen, you are least exposed (e.g., your smallest supply streams by volume or value), and where you have low influence (and cannot build it).

**What if I am not important enough to the supplier to change their behaviour?**

Environmental and human rights due diligence compels us to use whatever influence we have over a supplier in order to reduce the harm from arising, or minimising the adverse impacts. If you don't have enough power to influence a situation, consider how you might build that influence by working with others. Being a member of an industry association or forming a collective can help in this regard. And if you can't build the influence you need, and the risk is too high, then this is a case for finding a new supplier (and telling them why!).

**How frequently should I reconsider my past decisions?**

More frequently for issues that remain high risk in spite of your efforts or where you're aware that the situation has changed for your supplier and they are facing higher risks.

**Have I built up the right evidence that will justify my decisions to rights-holders and stakeholders in ways that they will trust?**

Keep all your responsible sourcing policies, procedures, supply chain maps, risk assessments and assurances (if you have the means to be assured) in one place. This will make it easy and efficient to share them when asked. And if you are using products that allow you to make a product claim (e.g., Fairtrade gold), then you should display the approvals for you to sell such products in your (work)shop (e.g., your Fairtrade gold licensee certificate).



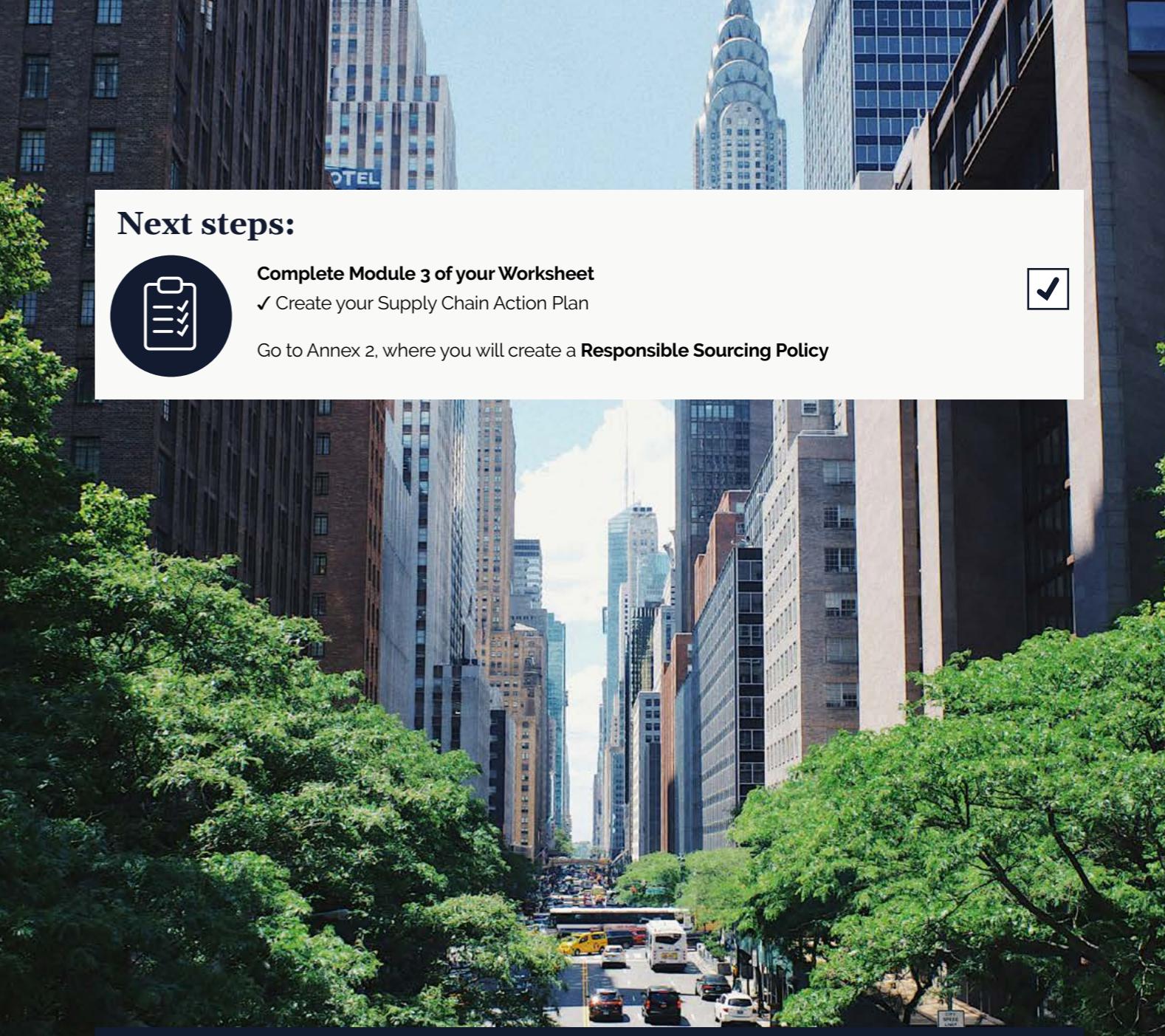
## Next steps:

**Complete Module 3 of your Worksheet**

✓ Create your Supply Chain Action Plan



Go to Annex 2, where you will create a **Responsible Sourcing Policy**

**Additional Reading and Resources:**

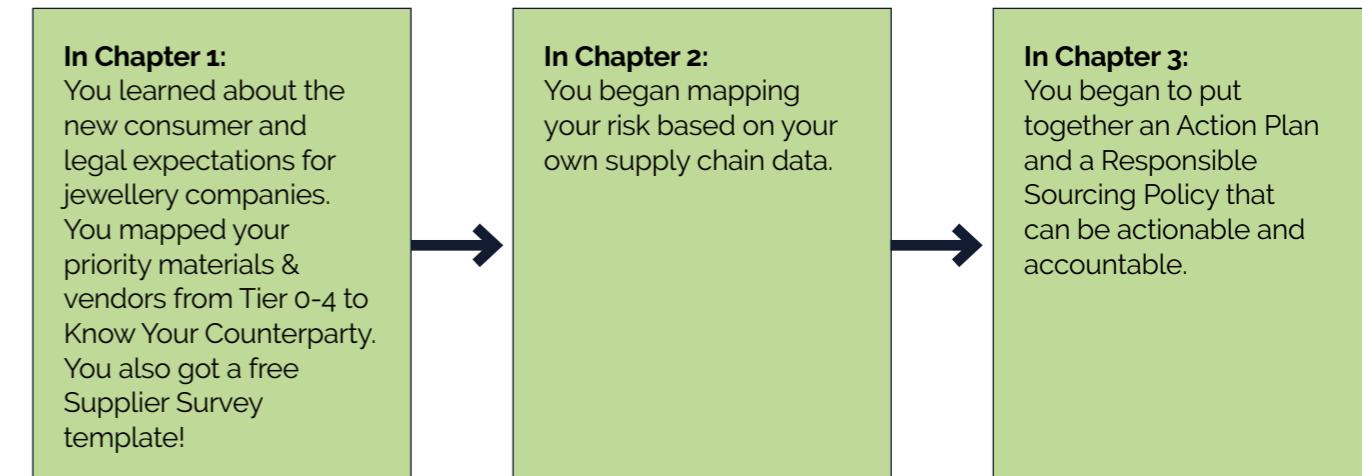
- [CIBJO's Responsible Sourcing Blue Book \(2019\)](#): The Blue Book, currently being updated in 2025, updates the 2019 guidance with expanded due diligence expectations and provides new, scalable guidance tailored to SMEs.
- [The Colour of Responsibility: Ethical Issues and Solutions in Coloured Gemstones](#): This foundational article from GIA's Gems & Gemmology publication remains a must-read summary of the diverse due diligence issues in coloured gemstone sourcing.
- [Due diligence ready! - European Commission](#) – Guidance from the European Commission on due diligence, targeted specifically at SMEs.
- [OECD Guidance for Responsible Business Conduct](#): This publication provides additional information and practical guidance directly from the OECD itself.
- [OECD's Interactive Due Diligence Interactive Website](#): This website allows users at different areas of the supply chain to better understand the responsibilities and those of others in the supply chain.
- [Recycled Gold—How Responsible Is It? \(Hint: Not Always\)](#): This thought piece discusses the various tensions within the 'recycled gold' discussion.

# Chapter 4

## Communicating with Customers and Staying up to Date



Congratulations! After completing the last part of your Journey Map, you now should have an actionable Plan for Responsible Sourcing that you have created for your own business needs and values. To recap:



**What is next?** Using your Plan as a basis for constant improvement. This Guide is meant to help get you started. Like all journeys, progress takes time. Your job now is to stay abreast of opportunities for coordinated action, new sources of responsible supply, opportunities for peer learning, and so on. You may also decide to support other jewellers who are at the start of their journey, or to expand these responsible sourcing practices to other goods and services in your supply chain.

### How to communicate

For SMEs that may not have experience with external communications on sustainability topics, reporting can start simply. This might involve:

- 1** Publishing a short summary on the company website outlining responsible sourcing goals and activities.
- 2** Sharing updates directly with customers or other important stakeholders during meetings.
- 3** Preparing internal summaries or slide decks for buyers, partners, or investors.

The key is to ensure that reporting is proportionate to the size and capacity of the business and aligned with the level of due diligence being conducted. Companies are encouraged to document their progress over time, not only as a communication tool but also as a way to measure their own performance, revisit goals, and support continuous improvement.

*CIBJO, Responsible Sourcing Blue Book*

## CHAPTER 4

# Staying Up to Date

## Joining peer businesses

Stay informed by joining jewellery or responsible trade associations. Like the small business segment of jewellery itself, these associations may sometimes be small, but they are mighty. They often have guidebooks, webinars, and networking events.

### Global opportunities to connect:

- Alliance for Responsible Mining: Offers a 'membership' program to jewellery businesses of various sizes. The benefits are educational series and behind the scenes information on gold supply chains.  
[responsiblemines.org/en/arm-membership](http://responsiblemines.org/en/arm-membership)
- Responsible Jewellery Council: The RJC is a global standards body for responsible jewellery from mine to retail.  
[responsiblejewellery.com](http://responsiblejewellery.com)
- Watch & Jewellery Initiative 2030: WJI 2030 is a jewellery industry action platform focused on driving responsibility in value chains.  
[wjinitiative2030.org](http://wjinitiative2030.org)

### Regional:

- Africa: [Jewellery & Gems Association of Africa](#)
- Europe and UK: [FairLuxury](#)
- Latin America: [MUBRI International](#)
- North America: [The Community for Ethical Jewellery \(CEJ\)](#), formerly known as Ethical Metalsmiths



## ANNEX 1 | Workbook Module 1

# Responsible Sourcing Journey Map

## STEP 1

## ESTABLISHING ORIGIN OF YOUR PRIORITY PRODUCTS

- List the most important jewelry minerals for your company in terms of sales.  
Examples: gold, diamonds, garnets, pearls, sapphire, etc.
- If you do not make jewellery, then list your best selling items  
Examples: gold chain, or a specific watch or designer collection.

	My Top Jewellery Minerals or Items	Associated Vendors (List the supplier name here)
1		
2		
3		
4		
5		

## STEP 2

## WHO ARE YOU? CHECK THE BOX THAT BEST APPLIES.

## THIS WILL DETERMINE YOUR GUIDED 'ROUTE'.

 Jewellery Store owner:

We offer a mix of custom pieces, our own store-branded designs, and collections from other jewelry makers.

Follow **Route A**.

 Custom Jewellery Maker and Manufacturer:

Most of what I sell is what I (or my direct team) makes ourselves in our workshop and in consultation with the client. My team usually chooses the gold, diamond, and gemstone vendors with whom we closely work.

Follow **Route B**.

Jewellery wholesaler of finished products: Follow **Route B**.

Other jewellery suppliers: Follow **Route B**. (In Step 3: you may be categorized as Tier 2 or 3)

## STEP 3

## JOURNEY PREP / PRE-WORK

## ROUTE A

## Jewellery Store Owners

- Congratulations! You are considered the "Tier 0 Supplier" in the mapping of your supply chain. (See definitions below).
- **Your first step is to review the Supplier Survey** (Annex 1) because you will send this to your top vendors who make & manufacture the jewellery that you sell. Those makers are referred to as your "Tier 1 Suppliers." (See the chart below for an explainer). You will use the completed Supplier Survey information to fill out in the next step (Step 4).

• *Please note that while you are 'Tier 0', you yourself still have direct responsibilities that cannot be delegated to your Tier 1 or other suppliers: You must follow up with each supplier to complete the Survey, then decide how to respond to the information you receive, and how to accurately communicate your journey to the customer.*

## Definitions of Tiers as applicable to the Jewellery Value Chain

- **The Tier 0 Supplier** is the retail jewellery store that interfaces with the consumer.
- **The Tier 1 Supplier** is the individual or company that produced the finished jewellery piece(s).
- **The Tier 2** is the source of the processed mineral. For example, this is the vendor of the 14K or 20K gold grain or sheet, the vendor of the cut & polished diamonds, the vendor of the faceted gemstones, finished beads, etc. This can be a mineral or material wholesaler, company that cuts & polishes diamonds & gems, etc.
- **The Tier 3** is the major supplier of the raw or rough minerals to other parts of the supply chain, such as the rough diamonds, gemstone exporter (such as an in-country dealer), or in-region refiner. They have a unique view into mined origin, which is why they are their own 'Tier'.
- **The Tier 4** is the producer of the raw material itself, such as the LSM company or ASM enterprise

## ROUTE B

## Custom Jewellery Maker and Manufacturers

- For this exercise, you are considered the "Tier 1 Supplier" because you produce the jewellery pieces and exercise more control over the selection of mineral suppliers. (See definitions above)
- If you work with large or small jewellery stores or brands, you may receive Supplier Surveys asking you about the origin of your materials, and even about your workshop labor and your own environmental & pollution control practices as they get to know you.

• As a Tier 1 supplier, you will need to contact your Tier 2 supplier(s) to collect information on the supply chain. (For example, through a survey, an email query, or a scheduled phone call).

• You should begin filling out the KYC Map in step 4 on the next page.

## ANNEX 1 | Workbook Module 1

## STEP 4 ROUTE A &amp; B

## KNOW YOUR COUNTERPARTY (KYC) BY MINERAL

Fill out the details of your supply chain based on your current knowledge and your supplier discussions so far.

## Mineral 1 or Item 1:

Tier	Company Name & Key Contact Person	Location of relevant businesss activity ( <i>List city &amp; country where possible</i> )
0 (Retailer)		
1 (Jewellery Makers & Original Manufacturers)		
2 (Processed Material Supplier). <i>Examples: Your metals wholesaler; your finished gem &amp; diamond supplier</i>		
3 (Metals Refiner or Rough Gems). <i>Examples: Gold or Silver Refiner or In-Country Gemstone Exporter/ Counterpart</i>		
4 (Mines). <i>Examples: Name of Industrial Mine, Responsible ASM Producer Program, or other Mineral Producer Company, if known.</i>		<i>Country of origin is the bare minimum level of information for mining</i>

## KNOW YOUR COUNTERPARTY (KYC) BY MINERAL

Fill out the details of your supply chain based on your current knowledge and your supplier discussions so far.

## Mineral 2 or Item 2:

Tier	Company Name & Key Contact Person	Location of relevant businesss activity
0 (Retailer)		
1 (Jewellery Makers & Original Manufacturers)		
2 (Processed Material Supplier)		
3 (Metals Refiner or Rough Gems)		
4 (Mines)		<i>Country of origin required</i>

## Mineral 3 or Item 3:

Tier	Company Name & Key Contact Person	Location of relevant businesss activity
0 (Retailer)		
1 (Jewellery Makers & Original Manufacturers)		
2 (Processed Material Supplier)		
3 (Metals Refiner or Rough Gems)		
4 (Mines)		<i>Country of origin required</i>

## ANNEX 1 | Workbook Module 1

## KNOW YOUR COUNTERPARTY (KYC) BY MINERAL

Fill out the details of your supply chain based on your current knowledge and your supplier discussions so far.

## Mineral 4 or Item 4:

Tier	Company Name & Key Contact Person	Location of relevant businesss activity
0 (Retailer)		
1 (Jewellery Makers & Original Manufacturers)		
2 (Processed Material Supplier)		
3 (Metals Refiner or Rough Gems)		
4 (Mines)		<i>Country of origin required</i>

## Mineral 5 or Item 5:

Tier	Company Name & Key Contact Person	Location of relevant businesss activity
0 (Retailer)		
1 (Jewellery Makers & Original Manufacturers)		
2 (Processed Material Supplier)		
3 (Metals Refiner or Rough Gems)		
4 (Mines)		<i>Country of origin required</i>

## Workbook Module 2

## AFTER COMPLETING CHAPTER 2, COMPLETE THE PAGES BELOW

## STEP 5    ROUTE A &amp; B

## MINE/MINING COMMUNITY LEVEL RISK MAP

## Limiting supply chain harm by identifying risk

- For each mineral and country of origin, review the supply chain risks outlined in Conscious Craft's Chapter 2 (see section on 'Mining')
- Then, begin to do some additional research on each applicable country in your own supply chain to understand if that risk may apply. (See the 'List of suggested data sources' following these tables)

*• Please note: There are potential risk management responses listed on the following pages (and in Chapter 3), so do not be overwhelmed by the information in this exercise!*

	Mineral	Mined Origin	Notes: Key Risks possibly affecting my materials	Do these risks apply to my materials? (How do I know, and how confident am I in this answer?)
1				
2				

## ANNEX 1 | Workbook Module 2

## MINE/MINING COMMUNITY LEVEL RISK MAP (CONTINUED)

## Limiting supply chain harm by identifying risk

	Mineral	Mined Origin	Notes: Key Risks possibly affecting my materials	Do these risks apply to my materials? (How do I know, and how confident am I in this answer?)
<b>1</b>				
<b>2</b>				
<b>3</b>				

## MINE/MINING COMMUNITY LEVEL RISK MAP (CONTINUED)

## Suggested data sources

	Topic	Data source and link	Notes
<b>1</b>	Child Labor	<ul style="list-style-type: none"> <li>● <a href="#">"List of Goods Produced with Child Labor." US Department of Labor</a></li> </ul>	
<b>2</b>	Other Forms of Forced Labor	<ul style="list-style-type: none"> <li>● <a href="#">Diamond Chapter, Verite Commodity Risk Report</a></li> <li>● <a href="#">Gold Chapter, Verite Commodity Risk Report</a></li> <li>● <a href="#">Gemstones &amp; Human Trafficking Risk, Verite</a></li> <li>● <a href="#">Silver Chapter, Verite Commodity Report</a></li> </ul>	
<b>3</b>	Identifying 'Conflict Affected and High Risk Areas' (CAHRAs)	<ul style="list-style-type: none"> <li>● <a href="#">Map of Countries considered 'Conflict Affected and High Risk Areas' for mineral sourcing, RAND Corporation</a></li> </ul>	
<b>4</b>	Understanding links to Environmental Crimes	<ul style="list-style-type: none"> <li>● <a href="#">Environmental Justice Atlas</a></li> </ul>	

## ANNEX 1 | Workbook Module 2

## PLACE A CHECK MARK IN THE BOXES THAT WILL FORM PART OF YOUR DUE DILIGENCE RESPONSE PLAN

## Next steps:

- Ask your supplier to tell you if the identified risk is or is not affecting your supply chain. Take a note of their responses, including if you believe them. If you are skeptical of their answers, consider how you can cross check their responses.
- Consider checking with an independent expert and ask for their opinion of the supply chain or the country context.
- For any definitive answers about mined origin and claims about the minerals not having associations with conflict, ask your suppliers to document that information in their written sales receipts to you.
- If you have strong purchasing power: ask for more information and for 'progressive improvement' from your supplier. Ask for them to begin working on 1-2 key issues and report back to you with evidence that they are working on it. If they refuse, then you could consider shifting suppliers.
- Once you complete your Responsible Sourcing Policy as a part of this guide, consider inserting components of it into your supplier contracts.
- You can highlight these changes on your website and take steps to promote the new line(s) of jewellery to alert customers of your new direction(s).

## Consider these next steps:

- Join an industry association to learn more about certain sensitive topics, countries, or where there might be interesting new sourcing initiatives that you can join.
- Begin to contribute funds to nonprofit projects working productively on the issues that your supply chains touch.
- Consider sourcing from new-to-you jewellery makers whose products directly align with your supply chain values and requirements.
- Beginning to purchase a small amount of material from an 'ethical' or 'responsible sourcing' initiative that focuses on mitigating some of the key supply chain risks that you face. If they perform well and they meet your product standards, buy more. (See a list of existing initiatives in Module 3)

## ANNEX 1 | Workbook Module 3 (continued)

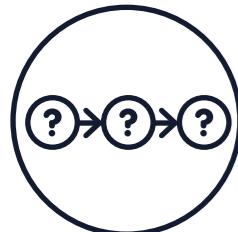
## MY SUPPLY CHAIN ACTION PLAN

- Use the additional risks outlined for gold, colored gems, and diamonds in **Chapter 3** and then revise your "Mine/Mining Community Level Risk Map" on this Template's page 2 with this new information.
- Start writing your next steps for each of your materials below based on the suggestions on previous pages and in Chapter 3 that make sense for your business needs and that aligns with your **new Supply Chain policy**.

	Material	Mined Origin	Next Step & Deadline	Interim Goal & Ultimate Goal
1				
2				
3				
4				
5				

## ANNEX 2

# Supplier Survey Process & Sample Questionnaire



Should you choose to utilise this survey template, please put it on your company letterhead and **prepare your supplier in advance** for the exercise. You should explain its purpose:



**To collect truly essential compliance information** that your business may be facing. In many cases, KYC and AML processes are already law. In other cases, these processes may be requirements, or upcoming requirements of your financial institutions because of the changing requirements outlined in Chapter 1.



To help you, as the client, **understand more about their business**, how the supply chain *currently* operates, and to learn about the measures they may already be taking to control risks and create positive social impacts.



**To assist you, as the client, more accurately label and market the material** on your website and in other media.



The **purpose should not be to find fault**, or to create 'gotcha' conversations, or to find out information that can cut someone out of a supply chain. For the industry to improve, everyone must have the opportunity to progressively improve. *If they do not take the opportunity to progressively improve, then that is a different situation.*

**Important note:** It may be tempting to create lengthy surveys. However, these KYC processes should maintain a careful balance so as not to exhaust suppliers who may be small businesses themselves, but also to collect the key information that you may need to comply with local business integrity expectations.

## 1. Basic Company Information

What is the full legal name of your company?

In what year was your company established?

In what location(s) is your company legally registered?

Please provide your business registration number (e.g. Tax ID) and issuing authority.

What is your primary business activity?  
(e.g., mining, trading, value addition such as cutting & polishing, manufacturing, retail)

Please provide the names of key company representatives  
(e.g. the Owner, CEO, general counsel, head of sales).

Please advise who in your company has ultimate and day-to-day responsibility for controlling environmental, social, governance, and commercial risk in your operations and supply chains?

If available, please provide your company website(s).

## ANNEX 2

**2. Business Ownership and Control**

Who are the ultimate beneficial owners of the company (natural persons with ≥25% ownership or control)?

Are any of the owners or senior managers of your company, or their close relatives, currently or formerly in a high-level government, political, or military position?  
(Examples: president, minister, judge, military general, central bank official, ambassador, etc.)

Yes  No

If yes, please provide details.

Is your company publicly listed on a stock exchange?

Yes  No

If yes, where?

And if so, what non-financial disclosures does this compel you to issue? Please share your latest ones.

**3. Supply Chain Transparency**

What types of materials do you supply to us (e.g., gold, silver, other metals, diamonds, coloured gemstones, pearls, finished jewellery pieces, other)?

Can you trace the materials you provide back to the mine or source?

- Yes, to the originating mine or pearl farm
- Yes, to the country of mined origin (e.g., where it was mined, pulled from the earth, or harvested)
- Yes, to laboratory of synthetic/laboratory-grown/laboratory-created diamond or gemstone origin
- No, however, I can document the supply chain from the point of where the gems were cut or polished, or the metals refined or recycled.
- No, however I can document the supply chain to the point where the metal components were manufactured.
- No, I do not have this information but I am willing help find out.
- No, I do not have this information and I do not want to help to find out more.

Please describe the origin of the materials (countries, mines, or sources) to the greatest detail possible. (Please note: If you cannot document your supply chain but have a good hunch about where the materials come from, please be clear about when you are speculating or making educated guesses and what leads you to believe that this origin is likely).

## ANNEX 2

**Material-specific information:**

**Gold suppliers:** If you provide gold to us, is this recycled gold, post-consumer recycled gold, or newly mined gold, or unknown? Does this gold meet any standards or guidelines, such as the LBMA Responsible Gold Guidelines, the WGC Responsible Gold Principles, Single Mine Origin, Fairmined, Fairtrade, or others? If so, please be specific. Do these assurances permit me to make a claim on the product, (e.g., "Fairmined gold")? If you are providing Fairtrade or Fairmined gold, do you have the necessary licences to be trading it?

**Diamond suppliers:** If you provide diamonds to us, are these natural mined diamonds or laboratory-grown? Are any of these diamonds recycled/reused? Please provide more information. Do these diamonds originate from suppliers that meet any standards or guidelines, such as the Polar Bear Diamonds, De Beers Best Practice Principles, or others? Do these assurances permit me to make a claim on the product, e.g., "polar bear diamonds."?

**For rough diamonds,** do you ensure that all shipments are accompanied by valid Kimberley Process certificates?

Yes  No

N/A because I do not supply you with rough diamonds.

N/A because I do not receive rough diamonds

Do you work directly with artisanal and small-scale miners (ASM)? This means that you yourself or your company purchase directly from ASM units or individual miners, or you finance or sponsor ASM production.

Yes  No

If yes, please provide more information about how long you have been doing this, how you are supporting them to professionalise their practices (directly or through a third party), how often you or your company visits, and if there may be any interesting storytelling opportunities for consumers.

If you source from ASM via intermediaries (e.g. dealers, local brokers, etc.), please indicate this and as much information as you know about the ASM producers, origin, and demographics (if known).

Describe the programmes in place to enhance positive impacts or mitigate negative impacts involving ASM. How did you decide which programmes to do – what role did the ASM have in selecting what you'd work on? Do any of your programmes specifically target equity-seeking groups (like women, children, BIPOC individuals, people with disabilities, refugees and asylum seekers, Indigenous peoples, etc.), protect/rehabilitate/regenerate the environment or tackle carbon emissions? Please explain.

## ANNEX 2

Do you work with industrial or larger-scale mines (LSM)? Which ones and in what countries?

If you source from LSM through intermediaries, please indicate this and provide as much information as you can.

Are you familiar with the OECD Due Diligence Guidance for responsible mineral sourcing?

Yes, and we are implementing it fully  Yes, and we have begun our journey to implement it  
 No

Do you have a responsible sourcing policy?

Yes (please attach)  No

Have you mapped your own suppliers and subcontractors?

Yes  No

Do you conduct risk assessments on your own suppliers and subcontractors?

Yes, on suppliers  Yes, on subcontractors  No

If so: Have you identified any OECD 'red flag' risks or other supply chain risks in the past 12 months? If yes, how were they addressed?

Do you source materials from any conflict-affected areas? Example jurisdictions would be DRC, Mali, Myanmar, Russia, Sudan, etc.

Yes  No

If yes, please describe your risk mitigation measures.

Do you source materials from any high-risk areas, per the EU's CAHRAs list?

Yes  No

If yes, please describe your risk mitigation measures.

Do you source any gold from places where environmental crime is commonplace, such as Bolivia, Brazil, Colombia, Ecuador, Peru, Suriname, or Venezuela?

Yes  No

Please describe any risk mitigation measures in place to avoid involvement with environmental crimes.

## ANNEX 2

**4. Anti-Money Laundering (AML) and Compliance**

Do you have an anti-money laundering (AML) program in place?

Yes (please provide a summary or policy)  No

Do you screen customers and suppliers against international sanctions lists (e.g., OFAC, EU, UN, USA)?

Have you or your company ever been investigated or penalized for money laundering, fraud, bribery, or related offenses?

**5. Environmental and Social Practices**

What are the areas where your company performs well in its supply chain? Please provide details.

Respecting human rights and/or empowering equity-seeking groups like women, children, Indigenous peoples, people with disabilities, refugees and asylum seekers and so on.

Protecting nature and/or delivering positive environmental impacts, such as through supporting suppliers to become more circular, address their carbon impacts or water use, rehabilitate and regenerate nature, and so on.

Addressing the most prevalent issues in artisanal and small-scale mining, processing and manufacturing, such as health and safety of workers, preventing or addressing child or forced labor, and so on

Advancing transparency, democracy and good governance

## ANNEX 2

What areas need improvement, either at the mine site level or country level or industry level?  
Please provide more information.

What other issues would you prioritise addressing if you had the capacity or a partner to help you?

## 6. Documentation

**Please provide us the following documents for our records.**

- Business license
- Tax ID certificate
- Ownership chart
- Responsible sourcing, AML and related (e.g., human rights, environment) policies
- Any third-party audit or certification reports
- Any disclosures you have made to regulators or the public about your responsible sourcing practices.

### Attestation

"I hereby certify that the information provided above is true and correct to the best of my knowledge and that I am authorised to submit this information on behalf of the company."

Name:

Title:

On behalf of (company):

Date:

Signature:

Thank you for your time to help us better understand how our favoured suppliers operate and to appreciate what you have achieved so far.

## ANNEX 3

# Creating Your Responsible Sourcing Policy



Responsible sourcing policies are not just cut and paste exercises. They should reflect the values of the business, its size, its true capacity to manage the policy, and its true commitment to it. Do not publish a policy that your business has no intention of following. That is consumer fraud and you could find yourself accused of greenwashing. CIBJO has also created a detailed, step-by-step [toolkit](#) for companies to establish and implement a responsible sourcing policy.



## Step 1

**Create a list of simple statements** about how your company will define and respond to responsible sourcing given the existing risks that it may have discovered in Modules 1 and 2.

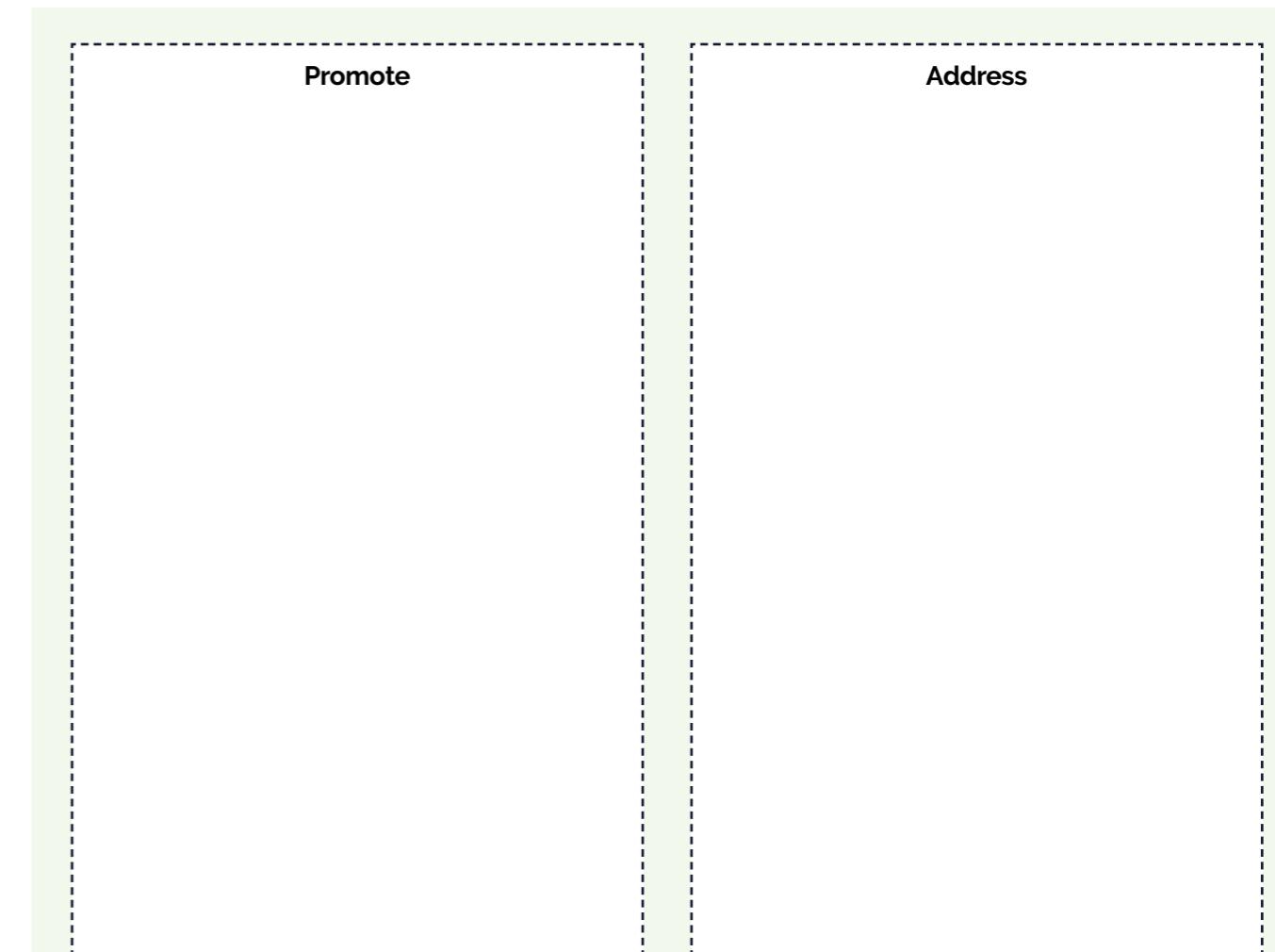
Start by identifying your values. Are you focused on:

- Responsible labour practices?
- Environmental sustainability?
- Supporting and nurturing emerging responsible sources?
- Advancing inclusivity by supporting and nurturing
  - certain equity-seeking groups, such as women, native and Indigenous groups, etc.?
  - Artisanal or small-scale miners?
- Something else?

Your policy should reflect your priorities.

Then, based on your supply chain mapping and identification and assessment of the risks in your supply chain, decide which issues you want to commit to addressing as your major priorities and in what way. Think about what you can realistically achieve to ensure your ambition level is pragmatic.

On the back of understanding your values and your priority risks, identify what you want to promote and what you want to address (whether through avoidance or minimisation of the risk, or – where you can't achieve either – by offsetting the risk).



## Step 2

### Commit to progress over perfection.

State in your policy that your goal is continuous improvement. A simple statement like the following can be effective: "We are committed to sourcing our materials responsibly and will work with our suppliers to improve transparency and sustainability over time."

State your vision for your supply chain in the next five years and the three steps that you will take to start to get there.

Express your commitment to monitor your progress in achieving these goals, and to adjusting your priorities and approach based on what you learn.

## ANNEX 3



## Step 3

**Set Clear Expectations for Suppliers**

Create a short list of what you expect from your suppliers. For example:

- No sourcing from suppliers where the worst human rights abuses are known to occur, per Annex II of the OECD Minerals guidance, and where there are no interventions to address such risks in this place. However, leading practice would be to couple this with preferential sourcing from suppliers that are part such local initiatives. For example, ones that address the risk of child or forced labour in the community and/or to assist youth educational and skills development programmes in these communities; that tackle widespread sexual- and gender-based violence; and so on.
- Suppliers should prove that they are supplying legal materials by providing tax receipts from at least the country of origin.
- Compliance with international regulations like the Kimberley Process (for diamonds) and sanctions against Russian diamonds and Burmese rubies.

You can include these in supplier communications or contracts. Ask for evidence that makes sense to you. Alternatively, talk to experts or peers if the responses do not make sense to you.

Responsible sourcing is a relationship and is not about imposing your demands. It is good practice to also set out how you'll support suppliers to do better.

- Specify who in your store or company is in charge of briefing suppliers on these expectations and guiding them to resources that can help them to improve.
- Commit to having that person fully trained on AML procedures and KYC.
- Commit to having and describe your system for tracking and cross checking supplier responses, and following up over time.
- Set out for suppliers what else they can expect from you, for example if you are keen to be contacted for guidance and mutual problem-solving, or to introduce them to people in your network that might be able to help with challenges they're facing.



## Step 4

**Be Transparent with your Customers on your Progress.**

You can share a shortened version of your policy on your website or in-store signage. Use simple, honest language. Transparency builds trust—even if you are still learning.



## Step 5

**Review and Update Your Policy Regularly**

Revisit your policy at least once a year. As your business grows or new issues emerge, your policy should evolve too.

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