

# Supply Chain Policy v. Jan 2022

[Company name]

[Address]

[Company name] places high importance on ethical business practices and we want to be a trusted partner for our customers, suppliers and wider stakeholders. In this policy, we set out what ethical business practices mean to us. This policy is aligned with the Antwerp World Diamond Centre's Supply Chain Policy Implementation Guidance and inspired by the 5-step OECD due diligence guidance.

## Our commitments

As [Company name], we commit to the following principles: [*select as appropriate from the list below*]

- *We do not source/purchase rough diamonds without a Kimberley Process Certificate.*  
We only purchase rough diamonds with a Kimberley Process Certificate to ensure our diamonds are conflict-free in accordance with the Kimberley Process conflict definition.
- *We do not engage in or tolerate money laundering or the financing of terrorism.*  
We have a Money Laundering and Anti-Terrorism Policy which sets out our company's clear commitments. We are committed to support and contribute to efforts to eliminate money laundering and terrorism financing where we identify a reasonable direct or indirect risk resulting from the extraction, trade, handling, transport or export of diamonds.
- *We do not engage in or tolerate bribery or corruption.*  
We will not engage in any forms of bribery and will reject any form of solicitation to conceal or disguise the origin or type of diamonds or to misrepresent fees, royalties and taxes to be paid to authorities throughout the diamond value chain.
- *We do not accept our diamond sourcing being linked to illegal armed groups.*  
We support human rights-compatible security forces in the diamond industry and our diamond sourcing shall not be linked to the direct or indirect support of illegal and non-stated armed groups (covered by the Kimberley Process Certification Scheme).
- *We do not accept violations of human rights.*  
We commit to respecting human rights according to the UN Universal Declaration of Human Rights and ILO Fundamental Rights at Work;  
We do not tolerate in our business and among our business partners:
  - torture, cruel, inhuman and degrading treatment,
  - forced or compulsory labour,
  - any form of child labour,
  - war crimes, violations of international humanitarian law, crimes against humanity or genocide,
  - other human rights violations and abuses

## How we live up to our commitments

We live up to these commitments in the way we do business and we expect the same from our suppliers. To fulfill these commitments, our due diligence practices are inspired by the OECD 5-step framework:

- **We structure our business internally** to effectively perform due diligence on our supply chain through:
  - ✓ this **Supply Chain Policy** setting out our commitments and expectations towards our suppliers;
  - ✓ assigning a **responsible, dedicated person** for our supply chain due diligence, and
  - ✓ following **training** on due diligence practices.
  - ✓ **gather key information from our suppliers** and further engage with them to understand the **origin of our diamonds**
  
- We have processes in place to **identify and address risks** in our diamond supply chain while making use of the **diamond industry specific legislation** and **self-regulating initiatives such as**:
  - ✓ **Kimberley Process Certification Scheme (KPCS)** guaranteeing conflict-free diamonds;
  - ✓ **Diamond Office** performing triple control measures on diamond imports/exports into the European Union;
  - ✓ **World Diamond Council System of Warranties** requiring buyers and sellers of rough diamonds, polished diamonds and jewelry containing diamonds include a statement on B2B invoice and memos that the goods being sold are in compliance with the KPCS and additionally warranting promotion of universal standards on human rights, labor rights, AML, anti-corruption practices in the company and dealings in diamonds by means of completing a self-assessment;
  - ✓ **Responsible Jewellery Council** requiring certified members to comply with sustainable standards and practices in the diamond- and jewellery industry.
  
- **Risk Mitigating** and follow-up measures on our supply chain risks:
  - ✓ If we identify that business partners do not share our values and live up to our commitments, we will investigate, analyze and **take up these forms of non-compliance with our business partners** in order to define concrete mitigation measures. In case of serious forms of non-compliance with our commitments or failure to apply proper mitigation measures, we will immediately stop engaging with our business partners.
  - ✓ We welcome any concerns that you might have about cases of non-compliance from our business partners which can be reported directly to [\[Name of the key responsible, e.g. AML/Supply Chain Officer\]](#) and/or to the Head of Compliance at the Antwerp World Diamond Centre. Your grievances will be assessed and kept confidential.

[\[Name of the key responsible, e.g. AML/Supply Chain Officer\]](#)

[\[Date\]](#)