

# Supply Chain Policy v. Nov 2023

[Company name]  
[Address]

## *Our commitments*

***[Insert Introductory paragraph outlining why company attaches importance to responsible business conduct.]***

We understand that risks for corruption, money laundering, conflict financing, and adverse human rights and environmental impacts exist throughout diamond supply chains. We commit to identifying and mitigating these risks, and we expect the same commitment from our suppliers.

- 1) We commit to respecting international standards and legislation, including (but not limited to) the Universal Declaration of Human Rights, the International Labour Organization (ILO) Core Labour Conventions, and national social and environmental legislation.
- 2) We commit to supporting and contributing to efforts to eliminate risks for money laundering and terrorism financing, and have a Money Laundering and Anti-Terrorism Policy.
- 3) We do not engage in- nor tolerate corruption. We do not engage in bribery, and reject any request to conceal or disguise the origin or type of diamonds; or to misrepresent fees, royalties and taxes to be paid to authorities.
- 4) We commit to carrying out due diligence in line with international standards. While this commitment is unwavering, capacity constraints and limited leverage over (some) business partners require us to adopt an incremental approach, and to prioritize certain actions over others. Over time, our due diligence efforts will become more encompassing.

## *Our actions*

- 1) We only source rough diamonds that have been purchased and brought into the EU under the Kimberley Process Certification scheme, and that are therefore conflict-free in accordance with the Kimberley Process conflict definition.
- 2) We stay informed about changing legal and operational due diligence requirements. We regularly follow trainings provided by the Antwerp World Diamond Centre (AWDC) **[insert other]**.
- 3) We constantly improve our understanding of the origin of our diamonds on the basis of information provided by our suppliers **[insert other]**.
- 4) We participate in industry- and multi-stakeholder initiatives:
  - The Kimberley Process Certification Scheme (KPCS);
  - Triple control measures on diamond imports/exports performed by the Diamond Office;
  - The World Diamond Council System of Warranties (SoW), which requires buyers and sellers of rough and polished diamonds, and jewelry containing diamonds, to issue statements on invoices and memos that the goods (1) comply with the KPCS; and (2) were handled in accordance with international standards on human rights, AML, and anti-corruption;

- ***The Responsible Jewellery Council (RJC). We comply with the RJC Code of Practices, which includes extensive due diligence requirements.***

5) [insert other]

6) [We are looking into opportunities to source responsibly from artisanal diamond mines (specify)].

7) [insert other]

### ***Monitoring and compliance***

We monitor compliance with this policy on the part of our suppliers through (**select appropriate**):

- Direct communication (e-mail, meetings, ...);
- Questionnaires;
- Compliance catalyst (Bureau van Dijk);
- **[Our complaints mechanism];**
- **[insert other e.g. audits, site visits, databases, ...]**

Any complaints or grievances related to non-compliance with this policy can be reported to **[Name and details]** and/or to the Head of Compliance at the Antwerp World Diamond Centre, and will be assessed and kept confidential.

When we receive indications of non-compliance, we reach out to our business partner, and possibly to other stakeholders, to verify these indications, and (where necessary) take appropriate corrective action. We commit to working together with business partners to ensure compliance with this policy. However, repeated instances of non-compliance may lead to the (temporary or permanent) termination of a relationship.

**[name and signature of person responsible for due diligence and management]**

**[Date]**