



Signet Responsible Sourcing Protocol (SRSP)

Appendix for Lab Grown Diamonds

Effective: Calendar Year 2020

1. General Principles

The SRSP is designed to ensure that all Signet jewelry materials are responsibly sourced. This Appendix establishes requirements specific to laboratory grown/created diamonds (LGDs). However, it must be read in association with the entire SRSP.

While other SRSP Appendices focus on the sources of materials and ensuring that materials are conflict-free, LGDs are an entirely manufactured product. Therefore, the risk profile of LGDs primarily relates to factory standards, assurance that the product is in fact LGD, and accurate disclosure.

2. Scope

The LGD Appendix applies to all LGDs supplied to Signet including loose polished LGDs and LGDs set into finished jewelry, including any diamonds or composite (assembled) stones containing LGD or having a coating with LGD material.

3. Requirements

3.1 LGDs are manufactured using two technologies: Chemical Vapor Deposition (CVD) and High-Pressure High-Temperature (HPHT). Suppliers must ensure that factory standards take account of the risks of the manufacturing process and should comprise of (but not necessarily be limited to) the following:

3.1.1. Factory staff are fully trained in the safe use of all equipment, which training must be regularly updated.

3.1.2 If applicable, any appropriate personal protective equipment (PPE) must be provided to all staff and worn at all times when staff are operating or in the proximity of applicable machinery.

3.1.3 If applicable and appropriate per 3.1.2, the wearing of PPE must be monitored and enforced, and replacement PPE issued promptly when necessary.

3.1.4 LGD production facilities must provide safe and healthy working conditions for all employees in accordance with applicable law and other relevant industry standards. LGD production facilities should be certified under appropriate occupational health and safety management system standards, such as ISO 45001 or equivalent.

3.1.5 Factories for cutting and polishing LGDs must meet the same standards as for natural diamonds.

3.2 Where a Supplier deals in natural diamonds and LGDs, the Supplier must have clear policies and procedures and take all precautions to ensure that LGDs are segregated from natural diamond production/polishing/jewelry manufacture/trading and/or any other relevant process in the pipeline at all times. Policies, procedures and training must make specific provision for this risk.

3.2.1 Suppliers must have procedures to ensure that natural diamonds and/or diamond simulants cannot become mixed with their LGD supply chain.

3.2.2 Suppliers must clearly disclose whether the LGDs are created using Chemical Vapor Deposition (CVD) or High-Pressure High-Temperature (HPHT), and keep LGDs produced using these technologies segregated.

3.2.3 Suppliers must implement appropriate training for staff involved in handling, movement or security of product.

3.2.4 These requirements should also be implemented in accordance with Clause 8 - Disclosure.

4. Testing of LGDs

4.1 Suppliers of LGDs must undertake testing to ensure all stones are in fact LGDs and that parcels do not contain natural diamond, diamond simulants and/or any material which is not laboratory-grown diamond. Suppliers must have written test protocols and maintain test records.

4.2 Suppliers may test on a sample basis, using an Average Quality Limit (AQL) basis (reference ISO 2859-1). Testing must be performed by qualified gemological personnel, in-house or outsourced to a gemological laboratory.

4.3 Suppliers are not required to test LGDs only if they meet the following criteria:

- are a manufacturer of LGDs;
- cut/polish LGDs;
- do not deal in natural diamonds or diamond simulants.

Further guidance on testing and disclosure of LGDs can be found at De Beers Group “Best Practice Principles Disclosure Practice Note” (see www.debeersgroup.com/building-forever/leading-ethical-practices-across-industry/best-practice-principles-assurance-programme)

5. Disclosure & Nomenclature

5.1 Suppliers should follow the US Federal Trade Commission Jewelry Guides (2018 Revision) as a general rule.

5.2 LGDs must always be accurately described, and clearly differentiated from natural diamonds and from non-diamond (diamond simulant) materials such as Cubic Zirconia or Moissanite.

5.3 Suppliers must have clear written policies and procedures to ensure that LGDs are fully and accurately described. All actors in the jewelry supply chain have a shared responsibility to protect the reputation of jewelry and build positive perceptions about jewelry, especially in the consumer sphere.

5.4 Neutral language should always be used by suppliers to Signet to describe LGDs. Therefore, the phrases “laboratory-grown”, “laboratory-created”, “[manufacturer name]-created” should be employed. The word “synthetic” should be avoided as a descriptor for LGDs because in common usage it can have a pejorative connotation, and may be inferred to mean “fake”.

5.5 Suppliers must take special care with the language used to describe LGDs. Pejorative language about natural diamonds should not be used, especially in association with claims to the effect that LGDs are more ethical or environmentally friendly than natural diamonds.

5.6 The policies and procedures must cover all relevant contracts, certificates and records of workers involved in the buying and selling of diamonds.

5.7 Suppliers should have a full disclosure policy relating to the supply of LGDs to Signet: full disclosure is the complete and total release of all material information about LGDs and the material steps the LGDs have undergone prior to sale. The Supplier must make all reasonable efforts to ensure that this information is disclosed at all times during the selling process. Full disclosure of all material facts must take place whether or not the information is specifically requested and regardless of the effect on the value of the LGDs being sold.

5.8 The disclosure policy must comprise of the following:

5.8.1 A statement that all relevant information will be disclosed (either verbally or in writing) prior to completion of sale.

5.8.2 A statement that any relevant disclosure will immediately precede or succeed the description of the stone or parcel and be equally conspicuous to that description.

5.8.3 A statement that this policy applies to the selling, advertising and distributing of any LGDs.

5.8.4 A statement that there will be no attempt to mislead customers through illustrations, descriptions, expressions, words, figures, depictions or symbols relating to the LGDs.

5.8.5 Disclosure statements for LGDs are not required in the Warranty Statements for LGDs (see below).

6. Evidence of Compliance

6.1 Suppliers must maintain copies of their policy statements, disclosure statements, terms of business and transaction documents which may be necessary to evidence compliance with the SRSP.

Consequential SRSP Amendments for LGDs

Warranty Statements

For suppliers of LGDs, it is necessary to distinguish a warranty statement for LGDs in addition to the existing SRSP and natural diamond warranty statements.

Suppliers of **laboratory-grown diamonds** should include the following warranty statements on all documents:

SRSP Warranty

“The seller warrants that these products have been supplied in compliance with the Signet Responsible Sourcing Protocol (‘SRSP’).”

Natural Diamond Warranty

“Any natural diamonds herein supplied have been purchased from legitimate sources not involved in funding conflict and in compliance with United Nations Resolutions and corresponding national laws. The seller hereby guarantees that these natural diamonds are conflict-free and confirms adherence to the WDC SOW Guidelines.”

Laboratory Grown Diamond Warranty (for LGD suppliers only, on all documents)

“Any laboratory-grown diamonds herein supplied comply with the SRSP and are warranted not to include any natural diamonds or any material which is not laboratory-grown diamond.”

