



Signet Responsible Sourcing Protocol (SRSP)

Signet's Supply Chain Due Diligence

Effective: Calendar Year 2020

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Starting with Gold and the “3Ts” in 2011, and subsequently extending the scope into Natural Diamonds, Silver, Platinum Group Metals, Colored Gemstones and Laboratory Grown/Created Diamonds, Signet has conducted extensive due diligence on the source and chain of custody of all of its products to understand the flow of minerals through the complex and fragmented supply chains to Signet. This due diligence, a process that has been developed and improved over many years, required a rigorous analysis of Signet's supply chains, and consultation with Signet's suppliers as well as leading global organizations.

From this analysis and these consultations, Signet has designed and implemented the Signet Responsible Sourcing Protocol (“SRSP”), introduced for gold and 3Ts as company policy in 2013 and continuously updated and improved thereafter to include natural diamonds (in 2017), other precious metals (in 2018) and colored gemstones and laboratory-grown/created diamonds (in 2020), which have led the jewelry industry in providing guidance to suppliers to ensure all products supplied to Signet are responsibly sourced and are “conflict free” and with respect for human rights.

SRSP Core References

Core references and standards which Signet suppliers should use to comply with the SRSP are;

OECD Due Diligence Guidance Summary



a: OECD Due Diligence Guidance (Summary)

The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals is a core reference for the SRSP. The full OECD Due Diligence Guidance can be found at www.oecd.org/corporate/mne/mining.htm

All Signet suppliers should follow the OECD Due Diligence Guidance framework, at least and especially Steps 1 and 2, as below, as they relate to the SRSP;

1. Establish strong company management systems.

a) Adopt and have available to Signet a company policy for the supply chain of minerals included in the SRSPs. Suppliers may wish to refer to Annex II of the OECD Due Diligence Guidance, which includes a model supply chain policy. The supplier's policy should incorporate the compliance requirements of the SRSP, against which due diligence is to be conducted.

b) Structure internal management to support supply chain due diligence and the requirements of the SRSP.

c) Establish a system of controls and transparency over the mineral supply chain in accordance with the SRSP compliance requirements for each mineral.

d) Strengthen company engagement with suppliers. A supply chain policy should be incorporated into contracts and/or agreements with suppliers in accordance with the requirements of the SRSP.

e) Establish a company-level grievance mechanism as an early-warning risk-awareness system.

2. Identify and assess risks in the supply chain.

a) Identify any risks in their supply chain which may be contrary to the compliance requirements of the SRSP for each mineral.

b) Assess risks of any adverse impacts in light of any non-compliance with the SRSP for each mineral.

If any risks are identified under Steps 1 and 2, these should be notified to Signet (at info@signetsrsp.com), and the supplier must design and implement a strategy and action plan to respond to these risks, in accordance with Steps 3 to 5 of the OECD Guidance, which must be agreed by Signet.

The OECD is developing a resource for companies to help identify and assess risks in their supply chains, by identifying individual minerals or by identifying individual country sources. This Risk Assessment Platform will become another core reference for the SRSP, and Signet encourages its suppliers to use this resource when available.

b: Responsible Jewellery Council Certification and Provenance Claims

Signet requires all suppliers to be members of the Responsible Jewellery Council (“RJC”), which is the global standard for responsible practices in the jewelry industry. RJC membership should cover all the entities under the control, influence or common ownership of the supplier which are involved in Signet’s supply chain (for example, factories in India, China, Thailand etc. as well as US sales offices), not only the company which directly supplies products to Signet, in accordance with the Application Scope of the SRSP in 2e above. Acquisitions by any supplier should be added to any existing RJC membership scope within 12 months of the acquisition.

The RJC allows a period of two years for a member to be audited and certified, measured from the date a company joins.

New RJC members have two years from their join date to achieve RJC certification. Failure to achieve initial certification on time will result in their member page on the RJC website being suspended and not publicly visible. They will then have a 6-month grace-period to achieve certification.

Existing RJC members who fail to achieve re-certification prior to the expiration of their current certification will result in their member page on the RJC website being suspended and not publicly visible. They will then have a 6-month grace-period to achieve re-certification.

The RJC’s Code of Practices includes a voluntary option for members to make claims about the provenance of materials (source, origin or practices used when sourcing), to have these audited as part of their RJC Code of Practices certification audit. Such “Provenance Claims” can serve to assure customers that the materials are sourced responsibly and specifically explain how, such as being recycled, or conflict-free.

Signet strongly recommends that suppliers add compliance with the SRSP for the relevant materials (gold, diamonds, platinum, and, when applicable in the RJC Code of Practices, silver and/or colored stones etc.) as a “Provenance Claim” in their RJC certification. The Provenance Claim must refer specifically to the SRSP for each of the relevant minerals (e.g. “[Company Name] sources gold in compliance with the Signet Responsible Sourcing Protocol): suppliers are free to add additional Provenance Claims in addition to SRSP compliance if they wish.

RJC certification with the Signet Responsible Sourcing Protocol (“SRSP”) for each mineral as “Provenance Claims” gives Signet independent assurances about the responsible practices of each supplier company as well as confidence regarding responsible sourcing through each supplier’s supply chain, which is an important component of Signet’s supply chain due diligence and risk assessment.

Suppliers which achieve this level of certification are not required to be audited separately by Signet, for the SRSP and also for other factory/social audits, for as long as the certification is valid (normally 3 years). Suppliers must inform Signet of any significant changes in the scope of RJC membership, lapses or failure to achieve RJC certification.

Any supplier which cannot provide RJC certification with a Provenance Claim may be subject to an audit of their SRSP Compliance Report and/or their factory/social practices by an independent third party audit firm, based on a risk assessment conducted by Signet. Signet suppliers are responsible for the expense of an audit.

c: The Kimberley Process Certification Scheme and the World Diamond Council System of Warranties

Signet requires all suppliers to comply with the Kimberley Process Certification Scheme and the World Diamond Council System of Warranties.



The Kimberley Process Civil Society Coalition has set out “Eight Key Issues” for improvement in the diamond supply chain. Signet acknowledges this important statement and supports on-going cross-sector collaboration to improve transparency in the global diamond supply chain.

All Signet suppliers (whether or not they supply diamonds or diamond jewelry) must include the warranty statements relating to the WDC System of Warranties in all invoices and delivery notes (see “Warranty Statements” below).

d: The London Bullion Market Association Responsible Sourcing Standard



The London Bullion Market Association (LBMA) Responsible Sourcing Programme was set up to consolidate, strengthen, and formalize existing standards of refiners’ due diligence. The Responsible Gold Guidance has been mandatory for all gold “Good Delivery” refiners since 2012, and the LBMA has recently expanded the scope of its responsible sourcing framework to include silver, which became a mandatory requirement for all silver “Good Delivery” refiners from 1 January 2018.

The LBMA’s requirements for refiners’ “Good Delivery” accreditation, incorporating the Responsible Sourcing standard, are a core reference for the SRSP for precious metals - gold, silver, platinum and palladium. Signet encourages all suppliers using precious metals to ensure refiners in their supply chain are on the current LBMA “Good Delivery” list (see www.lbma.org.uk). Other compliance standards relating to precious metals refiners are listed in the appendices for compliance requirements for gold and for silver/PGMs.

e: Cross-recognition of Other Industry Standards

Signet encourages the cross-recognition and harmonization of relevant standards to reduce unnecessary audit duplication.

For diamonds, the SRSP is harmonized with the De Beers Best Practice Principles, the World Federation of Diamond Bourses Code of Conduct and Chain of Warranties, the Jewelers of America Code of Professional Practices, the International Diamond Manufacturers Association Code of Conduct, the ALROSA ALLIANCE Guidelines on Responsible Business Practices, the United States Diamond Source Warranty Protocol, and the Diamond Development Initiative’s Maendeleo Diamonds Standard.

For precious metals, the SRSP recognizes SCS Global Services’ “Responsible Source” Standard for Precious Metals (www.scsglobalservices.com/certified-responsible-source-jewelry), the China Chamber of Commerce of Metals Minerals & Chemicals Importers &

Exporters (CCCMC) Guidelines for Responsible Minerals Supply Chains (<http://www.cccmc.org.cn/docs/2016-05/20160503161408153738.pdf>) and, based on independent expert assessment, the SRSP also recognizes the DMCC “Dubai Good Delivery” list for gold (see www.dmcc.ae/jltauthority/gold/the-dubai-good-delivery-list-gold/) as equivalent to the LBMA guidance for the supply of gold from certified refineries. The SRSP also recognizes the CRAFT code for artisanal and small-scale mining (“ASM”) (see www.responsiblemines.org/en/our-work/standards-and-certification/craft), the Fairtrade Gold Standard through registered refineries (www.fairgold.org) and gold supplied through the Responsible Artisanal Gold Solutions Forum (RAGSF).

For 3Ts and gold, the SRSP recognizes the Responsible Minerals Initiative (RMI) Responsible Minerals Assurance Process (RMAP) and the list of conformant 3Ts and gold smelters and refiners at www.responsiblemineralsinitiative.org/conformant-smelter-refiner-lists/.

In case any Signet supplier relies on any trade associations, membership organizations or any other organization for their responsible supply chain policy, suppliers should establish what standards or guidance are used by these organizations to provide assurance or responsible practices to the supplier’s supply chain, and ensure that Signet confirms that these standards are consistent with the requirements of the SRSP.

f: International Policy Positions (by governments and civil society)

As a leading international jeweller, Signet works with governments, trade associations, civil society (NGOs) and jewelry suppliers around the world to implement responsible supply chain standards. The Signet Responsible Sourcing Protocol (SRSP) is designed to ensure that Signet’s supply chain complies with applicable laws and does not contribute to conflict or human rights abuses.

Signet will not purchase jewelry in any form from companies or entities subject to United Nations, US, UK, Canadian or EU sanctions. Suppliers must conduct thorough due diligence in support of Signet’s legal requirements in this and all current or future areas of regulatory compliance.

Signet reserves the right to restrict or forbid without notice the supply of any materials in response to policy positions by governments and/or reports by civil society, which may relate to human rights abuses, contribution to conflict, or social and environmental disturbance.

