



Signet Responsible Sourcing Training Webinar

Step-by-step guidance on how to complete
the SRSP Report

September 2024



TOPICS FOR TODAY



Why Responsible Sourcing?

- Consumer and Investor Expectations



SRSP Compliance Required Business Policies

- Signet's Russia Ban
- Know Your Customer/Counterparty (KYC) Policy
- Human Rights Policy
- Anti-Money Laundering, Bribery and Facilitation Payments
- Management Systems
- Conflict-Free Policy

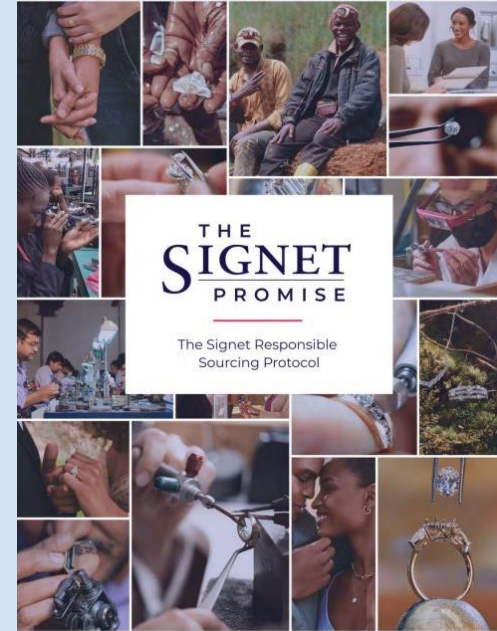


What do you supply Signet? SRSP Appendices

- Gold, 3Ts, Silver / PGMs
- Natural Diamonds, Lab Grown Diamonds, Colored Gemstones
- Required Warranty Statements
- SRSP Audits – What to Expect?

Help and Support

Contact us!



Slide 2



Why Responsible Sourcing?

Consumer and Investor Expectations

Responsible sourcing of products is important and expected, especially by today's consumers.

Products must not be associated with human rights abuses or environmental damage.

Many industries have been actively managing these issues for years:

- Timber: Forest Stewardship Council
- Clothing: Fair Labor Association
- Fish: Marine Stewardship Council
- Bananas, cotton, coffee, etc. Fair Trade

The jewelry industry also understands and has been working on these issues for over 25 years.



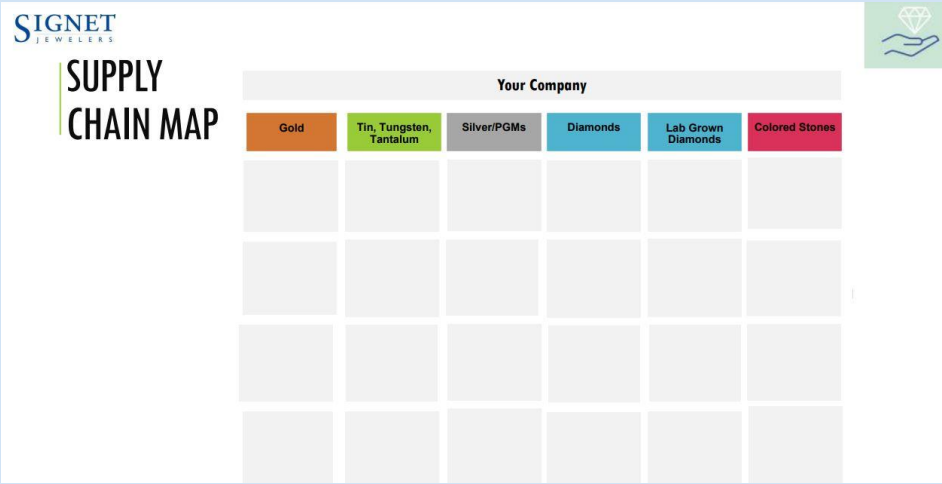
Compliance with the SRSP

What does “responsibly sourced” mean?:

“Responsibly sourced” means that suppliers will avoid contributing to human rights abuses and/or conflict through their sourcing practices. Suppliers must **map their supply chain** ensuring compliance with all active sanctions and employ due diligence to identify risks and take appropriate measures to mitigate any identified risks.

Example Supply Chain Map template available [here!](#)

Reference SRSP, page 9



The image shows a 'SUPPLY CHAIN MAP' template for Signet Jewelers. It features a grid with columns for different materials: Gold, Tin, Tungsten, Tantalum, Silver/PGMs, Diamonds, Lab Grown Diamonds, and Colored Stones. The top row is labeled 'Your Company'. The rest of the grid is empty, indicating a template for mapping suppliers.

Your Company							
Gold	Tin, Tungsten, Tantalum	Silver/PGMs	Diamonds	Lab Grown Diamonds	Colored Stones		

Introduction

- The intent of this webinar is to provide tools and detailed information to assist you in completing your annual SRSP report, which is due by October 31, 2024.
- We will walk you through the SRSP report questions in the order in which they appear in the report. A complete list of the questions is also available in the [SRSP Toolkit](#).
- Links to policy templates are included throughout the presentation to assist you with the creation of required policies if you do not already have them in place.
- If an audit of your SRSP Report is required, you will need to supply documentation supporting your answers to the independent third-party auditor.

Active sanctions: Signet's Russia ban

Reference full details in the SRSP, page 13

Compliance with the SRSP

SRSP Report - Question 1A: Is your company compliant with Signet's Russia Sourcing Policy implemented on March 16, 2022?

Signet halted all trade in all precious metals, diamonds (natural or lab created) and/or colored gemstones **that originate from sanctioned Russian sources** and suppliers are required not to supply the same to Signet even though the country(s) in which you operate may not have imposed sanctions on Russian precious metals and diamonds.

By including the Signet SRSP warranty statement on **all invoices** that accompanies product to Signet, you are certifying that no precious metals, diamonds (natural or lab grown) and/or colored gemstones of Russian origin purchased after February 24, 2022, are included. This policy will remain in effect until an international consensus is reached that the human right violations have ceased, and Signet notifies you of the same.

[See Required Warranty Statements - Page 13](#)

Required Business Policies

- The next three slides are related to **business policies** all suppliers should have in place, regardless of what you supply Signet.
 1. Know Your Customer / Counterparty (KYC) Policy
 2. Human Rights Policy
 3. Anti-Money Laundering (AML) / Bribery and Facilitation Payments Policy
- Each slide will contain a link to a policy template you can adapt for your company if you don't already have the policy in place.

Know Your Customer/Counterparty Policy (KYC)

Reference full details
in the SRSP, page 10

See *KYC Form template* [here!](#)

Required Business Policies

SRSP Report - Question 1B: Do you have a Know Your Customer/Counterparty (KYC) policy in place?

Suppliers are required to apply Know Your Customer/Counterparty principles (“**KYC**”) to their supply chains, which require businesses to establish the identity of all organizations with which they deal, have a clear understanding of their business relationships and have a reasonable ability to identify and react to transaction patterns appearing out of the ordinary or suspicious. Procedures may include:

- Collection and analysis of basic identity information.
- Name matching against lists of known parties.
- Details of the supplier’s policies and procedures (especially relating to identification of sources of scrap/recycled supply).
- Determination of the supplier’s risk, especially in terms of propensity to supply minerals from an area of conflict or human rights abuses and the trade of minerals on a cash transaction basis.
- An expectation of a customer’s transactional behavior.
- Monitoring of a customer’s transactions against their expected behavior and recorded profile.

Human Rights

A Policy commitment to respect Human Rights

Reference full details in the SRSP, page 11

See *Human Rights Policy template* [here!](#)

Required Business Policies

SRSP Report - Question 1C: Does your company have a human rights policy as defined by the SRSP and have you received written assurance from your suppliers that they have a human rights policy as defined by the SRSP?

Suppliers shall respect Human Rights and observe the UN Guiding Principles on Business and Human Rights in ways appropriate to their size and circumstances, including as a minimum:

- A policy commitment to respect Human Rights
- Inclusion of measures in the supplier's due diligence process that seek to identify, prevent, mitigate and account for how they address their impacts on Human Rights
- Where suppliers identify that they have caused or contributed to adverse Human Rights impacts, they shall provide for or cooperate in legitimate processes to enable the remediation of those impacts.

Suppliers' due diligence on their supply chains should also verify that **their own suppliers** also follow these minimum Human Rights requirements.

AML, Bribery and Facilitation Payments

Reference full details
in the SRSP, page 11-12

See *AML Policy template* [here!](#)

Required Business Policies

SRSP Report - Question 1D: Does your company have Anti-Money Laundering (AML) /bribery/facilitation policies as defined by the SRSP and have you received written assurances that your suppliers have these policies in place as well?

Suppliers should have a proper Anti-Money Laundering (AML) /bribery/facilitation policy in place that includes components as outlined in the SRSP. Your policy must be communicated internally within your organization and with all your direct suppliers.

For full details, please refer to the SRSP, pages 11-12.

Product you Supply to Signet

- **Questions 1.0 and 1.01** – You will be asked to select what you generally provide to Signet.
- Later in the report, you will be asked to specifically report on what you supply in the product or a service you provide Signet.
- Do your products contain?:
 - Gold **(Question 2.0)**
 - Tin, Tungsten, Tantalum (3Ts) **(Questions 3.0, 4.0, 5.0)**
 - Silver / Platinum Group Metals (PGMs) **(Question 6.0)**
 - Natural Diamonds **(Question 7.0)**
 - Lab Grown Diamonds **(Question 8.0)**
 - Colored Gemstones **(Question 9.0)**

Responsible Jewellery Council (RJC) Membership

SRSP Report - Question 1.11: Is your company a member of the Responsible Jewellery Council (RJC)?

- You should answer “Yes” only if your company name is listed on the RJC’s website as a member or certified member as your response will be verified by the Responsible Sourcing Team.



[Responsible Jewellery Council - Find a Member](#)

Management systems, supplier terms of business and a compliance officer

Reference full details in the SRSP, page 9

See *Management System Policy template* [here!](#)

See *Compliance Officer Communication template* [here!](#)

See *Responsible Sourcing Terms of Business Letter template* [here!](#)

Required Business Practices

SRSP Report - Question 1.17: Do you have management systems, supplier terms of business and a compliance officer in place?

All suppliers should have **Management Systems** in place and a dedicated contact person for Signet who acts as “**compliance officer**” who is responsible for completing all required compliance reports and management of any related audits (i.e.. SRSP and/or factory/ethical audits).

Suppliers must have **terms of business/contracts** with their suppliers’ ensuring compliance with the SRSP and related appendices is a requirement in the terms of business/contracts. These terms of business must be documented and available for review by an auditor if requested.

Supply Chain Due Diligence

Reference full details
in the SRSP, page 5

Example
[Supply Chain Map template](#)
available here!

Required Due Diligence

SRSP Report - Question 1.18: Have you undertaken due diligence in your supply chain of all materials/minerals supplied to Signet?

Question 1.19: Have you found any risks in the Signet supply chain which need reporting to Signet?

All suppliers to Signet are required to undertake due diligence on their own supply chains in accordance with the OECD's Due Diligence Guidance 5-step framework to ensure that these supplies are responsibly managed and are **"conflict-free"** and sourced with respect for human rights.

You **map your supply chain** to ensure you are accounting for all suppliers of materials (precious metals, natural diamonds and lab grown diamonds, colored gemstones, and findings) that are covered by the SRSP and determine whether any risks were found.

Conflict-Free Policy

Reference full details in the SRSP, pages 10-11

See *Conflict-Free Policy* template [here!](#)

Required Business Policies

SRSP Report - Question 1.21: Are your products "conflict-free" as defined in the Signet Responsible Sourcing Protocol (SRSP)?

Suppliers must ensure that all minerals supplied to Signet do not directly or indirectly contribute to conflict.

Suppliers should ensure that the minerals are "conflict-free" through compliance with the criteria listed in the Appendices to the SRSP and associated standards and guidance (e.g., RJC certification, Kimberley Process certification, LBMA Responsible Sourcing standards).

Suppliers may source from areas of conflict (i.e., DRC and neighboring countries) providing those sources are certified in accordance with international minerals standards.



**Product you supply
Signet
SRSP Appendices**

Product you supply Signet (Questions 2.0 – 6.0)

Does your company currently or plan to supply products of any kind containing...

➡ **Gold (2.0)**

SRSP requirements apply to all **gold** products (finished and components), and to all products containing **gold**.

If you supply product containing **gold** you will need to report the sources you use and maintain documentary evidence (i.e., terms of business, delivery certificates, invoices etc.) to support your statements of compliance.

See SRSP, Page 16 for full requirement details.

➡ **3Ts – (3.0, 4.0, 5.0)**

SRSP requirements apply to all **3Ts** products (finished and components), and to all products containing **3Ts**.

If you supply product containing **3Ts** you will need to report the sources you use and maintain documentary evidence (i.e., terms of business, delivery certificates, invoices etc.) to support your statements of compliance.

See SRSP, Page 20 for full requirement details.

➡ **Silver / PGMs (6.0)**

SRSP requirements apply to all **Silver / Platinum Group (PGMs)** products (finished and components), and to all products containing **Silver/PGMs**.

If you supply product containing **Silver/PGMs** you will need to report the sources you use and maintain documentary evidence (i.e., terms of business, delivery certificates, invoices etc.) to support your statements of compliance.

See SRSP, Page 27 for full requirement details.

SRSP Appendices - Gold, 3Ts, Silver / PGMs

Product you supply Signet (Question 7.0 - Natural Diamonds)

Does your company currently or plan to supply products of any kind containing...



Natural Diamonds (7.0)

SRSP requirements apply to all **natural diamonds** supplied to Signet including loose rough and polished natural diamonds, and natural diamonds set into finished jewelry.

If you supply product containing **natural diamonds** you will need to maintain documentary evidence (i.e., terms of business, delivery certificates, invoices etc.), and **testing procedures documentation** to support your statements of compliance.

See SRSP, Page 21 for full requirement details.



New Question 7.0.a

The World Diamond Council (WDC) has revised its System of Warranties (SoW). All suppliers of natural diamonds (loose or set in jewelry) are required to complete the annual WDC self-assessment.

7.0.a - Has your company completed the World Diamond Council's (WDC) annual online self-assessment for all diamond suppliers?

If you respond, "Yes," your company should be using the WDC's revised SoW on all invoices and delivery notes.

If No, Please access and complete the WDC's online self-assessment [here](#).

Product you supply Signet (Question 8.0)

Does your company currently or plan to supply products of any kind containing...

➔ Lab Grown Diamonds (8.0)

The SRSP appendix for **Lab Grown Diamonds (LGDs)** applies to loose rough or polished, or LGDs set in jewelry.

Compliance requirements cover factory, health and safety working conditions, testing and disclosure requirements.

You will need to maintain documentary evidence (i.e., terms of business, delivery certificates, invoices etc.), to support your statements of compliance.

You will also need to maintain proof that facilities are certified under appropriate health and safety system standards.

See SRSP, Page 34 for full requirement details.

Product you supply Signet (Question 9.0)

Does your company currently or plan to supply products of any kind containing...

➔ Colored Gemstones (9.0)

SRSP requirements apply to all natural **Colored Gemstones**, loose or set in jewelry.

Suppliers of natural gemstones must undertake testing to ensure the stones are natural and to detect treatments. Suppliers must have written test protocols and maintain records.

Suppliers must ensure gemstones are not sourced from any sanctioned country.

If you supply product containing **Colored Gemstones** you will need to maintain documentary evidence (i.e., terms of business, delivery certificates, invoices etc.), to support your statements of compliance.

See SRSP, Page 31 for full requirement details.

Questions 10.0 – 11.0

Other Products, Grievances, Concerns, and Identification of Risks

➡ Other Products (10.0)

Does your company provide jewelry in materials other than gold, tin, tungsten, tantalum, silver, platinum group metals (PGMs), natural or lab grown diamonds, colored gemstones (natural emerald, ruby, and / or sapphire) to Signet?

Select from the dropdown and use “Other” for any additional product or service not listed.

➡ Grievances, Concerns (11.0)

Suppliers can make any comments and express any grievances on the report and provide any additional information to support compliance claims.

Suppliers can make Signet aware of any risks or concerns relating to their own supply chain or those of others.

See SRSP, Page 6 for additional information on grievance mechanisms and OECD Due Diligence.



Required Warranty Statements

Warranty Statements for all suppliers

SRSP Report - Question 12: Do you plan to immediately include the SRSP warranty statements on all your documentation?

- **All suppliers** are required to include the SRSP and the revised WDC SoW on **all** invoices, **even** if you do not supply gold, 3Ts, diamonds (natural or lab grown), silver, PGMs, or colored gemstones.
- By including the Signet SRSP warranty statement on each invoice/delivery note you are certifying that no precious metals, diamonds (natural or lab grown) or colored gemstones of Russian origin purchased after February 24, 2022, are included.

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

WDC SoW: *“The diamonds herein invoiced have been purchased from legitimate sources not involved in funding conflict, in compliance with United Nations Resolutions and corresponding national laws. The seller hereby guarantees that these diamonds are conflict free and confirms adherence to the WDC SoW Guidelines.”*

For LGDs only: *“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.”*



Signet Audit Requirements

SRSP Report Audit: What to Expect?

- If you are required to undergo an SRSP documentation report audit:
 - Signet will notify you to request the audit and provide details on how to schedule the audit.
 - You will need to provide the auditor with documentation to support all claims you made in your SRSP Report.
 - A factory audit of company-owned or third-party manufacturing facilities may also be required.
 - Refer to the [2024 SRSP Audit Guidance](#) for additional details.

Thank You!

[Signetresponsiblesourcing.com](https://www.signetresponsiblesourcing.com)

- This webinar and step-by-step instructions on accessing the Signet Responsible Sourcing website and completing reports, are both available in the [SRSP Toolkit](#), SRSP Supplier Training.

Contact Information:

- SRSP Report questions, contact info@signetsrsp.com / or use the Supplier Contact form at: [signetresponsiblesourcing.com](https://www.signetresponsiblesourcing.com)

The screenshot shows the Signet Jewellers website. At the top, there is a navigation bar with 'HOME', 'RESOURCE LIBRARY', 'SUPPLIER SUPPORT', and 'SUPPLIER SIGN IN'. Below this is a large banner with a diamond icon and the text 'WELCOME To Signet Responsible Sourcing'. To the right of the banner is an image of a necklace with three circular pendants. Below the banner are three smaller images: a woman holding a baby, hands working on a piece of jewelry, and a close-up of a diamond. Below these images is a section titled 'A Resource for Suppliers to Signet Jewellers'. This section contains text about the Signet Responsible Sourcing Protocol, a promise to advance human rights, and information about the Signet Responsible Sourcing Council (SRSC) and the Responsible Sourcing Protocol (RSP). At the bottom of the screenshot, there is a footer with '© Signet Jewellers Limited 2023', 'Terms of Use', and 'Privacy Policy'.