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## **IGCJD Supply Chain Policy**

### **1. Introduction**

IGCJD is a leading supplier of ethically sourced diamonds and fine jewelry. This policy affirms IGCJD's commitment to respecting human rights, avoiding contributions to the financing of conflicts, and complying with all relevant United Nations sanctions, resolutions, and laws.

#### **Definitions:**

- **Risk:** The potential for adverse impacts arising from a company's activities or relationships, including with third parties like suppliers. High-risk areas in due diligence include:
  1. Serious abuses in the extraction, transport, or trade of minerals (e.g., torture, forced labor, child labor, human rights violations, war crimes).
  2. Direct or indirect support to non-state armed groups.
  3. Support to public or private security forces involved in illegal mining or profiteering.
  4. Bribery or misrepresentation of the origin of minerals.
  5. Money laundering or the non-payment of taxes/royalties.
- **Red Flag:** A warning or indicator of potential risk that requires enhanced due diligence. Red flags may relate to the location, supplier, or specific situation.
- **Conflict-Affected and High-Risk Areas (CAHRAs):** Areas characterized by armed conflict, violence, or risks of harm. These regions often face institutional instability, human rights abuses, and legal violations. Responsible sourcing from CAHRAs requires robust due diligence.

### **2. Responsible Jewellery Council Certification**

IGCJD is a certified member of the Responsible Jewellery Council (RJC) and is committed to:

- Respecting human rights in line with the Universal Declaration of Human Rights and International Labour Organization (ILO) standards.
- Rejecting bribery, corruption, money laundering, and terrorism financing.
- Supporting transparency in government payments and the use of security forces that adhere to human rights standards.
- Avoiding support to illegal armed groups.
- Enabling stakeholders to voice concerns about the supply chain.
- Implementing the OECD's 5-Step Framework for responsible mineral sourcing from CAHRAs.

### **3. Influence and Supplier Risk Management**

IGCJD uses its influence to prevent abuses in its supply chain. Suppliers are expected to uphold the same ethical standards, and IGCJD actively monitors the risk of non-compliance. Stakeholders can voice concerns through a complaints mechanism regarding materials sourced from CAHRAs. The CAHRA list is sourced from the official page adhering to Regulation (EU) 2017/821 ([www.cahraslist.net/cahras](http://www.cahraslist.net/cahras)).

### **4. Supply Chain Grievance Mechanism**

IGCJD provides a grievance mechanism for stakeholders and whistle-blowers to raise concerns about the supply chain. The process ensures anonymous reporting, confidentiality, and protection for whistle-blowers. Key elements include:

- Accurate recording of complaints.
- Anonymous reporting options.
- Protection from retaliation.
- Thorough investigation and action.
- Retention of records for at least 10 years.

For inquiries, contact:

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## **5. Red Flag Identification**

If a red flag is identified, IGCJD will conduct enhanced due diligence, which includes requesting additional documentation from suppliers and increasing monitoring efforts.

## **6. Serious Abuses Related to Diamond Extraction, Transport, or Trade**

IGCJD does not tolerate or engage in any of the following serious abuses:

- Torture or inhumane treatment.
- Forced or compulsory labor.
- Child labor.
- Human rights violations.
- War crimes, crimes against humanity, or genocide.

## **7. Engagement with Suppliers**

IGCJD will immediately cease business with any supplier if there is a reasonable risk that they are involved in the abuses listed in Section 6 or linked to parties committing these abuses.

## **8. Diamonds**

IGCJD deals exclusively in polished, untreated natural diamonds and works only with suppliers who provide full disclosure about their products. IGCJD is not involved in the trade of lab-grown, treated diamonds, or simulants (LTS). IGCJD sources diamonds from legitimate sources not involved in funding conflicts, adhering to United Nations resolutions and the World Diamond Council System of Warranties (SoW).

**Assurance:** As required by the World Diamond Council SoW, all incoming and outgoing invoices or memos include the statement:

*“The diamonds herein invoiced or on memo are exclusively of natural origin and untreated based on personal knowledge and/or written guarantees provided by the supplier.”*

**Disclosure:** IGCJD ensures that employees are informed about LTS. If IGCJD sells any LTS, full disclosure will be made before the transaction and on all related documents, extending to the end-consumer level.

**Sourcing:** IGCJD sources the majority of its jewelry from IGC Jewelry Services Ltd, a BPP-compliant company and subsidiary of the De Beers Sightholder IGC Group, located in Bangkok. Occasional sourcing is done from reputable jewelry manufacturers located in the USA.

## **9. Silver, Gold, Platinum**

IGCJD upholds high ethical standards in its sourcing of silver, gold, and platinum, requiring the same from its business partners. The company ensures its suppliers:

- Meet stringent human rights, social, and environmental criteria.
- Engage in responsible gold sourcing.
- Preferentially source gold from mines with high environmental standards.

**Disclosure:** The gold karat and platinum purity are disclosed on all jewelry-related documents.

**Sourcing:** IGCJD sources the majority of its jewelry from De Beers Sightholder company IGC Jewelry Services Ltd in Bangkok, a BPP-compliant company.

### **10. Support for Non-State Armed Groups**

IGCJD supports the Kimberley Process Certification Scheme and prohibits engagement with non-state armed groups. This includes:

- Procuring diamonds from or making payments to non-state armed groups.
- Engaging with intermediaries involved in illegal taxation or extortion in the supply chain.

### **11. Termination of Supplier Engagement Related to Non-State Armed Groups**

If there is a reasonable risk that a supplier supports non-state armed groups, IGCJD will immediately terminate business with that supplier.

### **12. Public and Private Security Forces**

IGCJD will not support public or private security forces engaged in human rights abuses or illegal actions as described in Sections 6 and 8. Security forces should operate under the rule of law to protect people and assets.

### **13. Bribery and Fraudulent Misrepresentation**

IGCJD rejects bribery and fraudulent misrepresentation of diamond origins. The company adheres to legal requirements regarding taxes, fees, and royalties associated with diamond extraction and trade.

### **14. Money Laundering**

IGCJD is committed to combating money laundering in its supply chain. The company requires:

- Completed Know Your Customer (KYC) questionnaires.
- Checks against government lists for money laundering or ties to prohibited organizations.
- Official government-issued IDs or business licenses.
- Supplier due diligence forms. Checks are conducted annually for low-risk jurisdictions and every six months for high-risk areas.

### **15. Review**

This policy will be reviewed annually to ensure its continued relevance and effectiveness.

**Signed/Endorsed:**

**Anne-Marie De Scheemaeker, Director**

*A. De Scheemaeker*

23 October 2024