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# **An ESG and Sustainability Roadmap for the Jewellery Sector**

Edition 1.0 | April 2024

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## 1. Introduction

The jewellery industry operates within a complex and evolving ecosystem. With increasing attention on sustainability, environmental impacts, and ethical considerations, companies in this sector face pressing challenges and responsibilities. Navigating the extensive landscape of Environmental, Social, and Governance (ESG) topics is no simple task, especially for small to medium-sized businesses, which often grapple with limited resources while trying to meet the heightened expectations of larger downstream brands<sup>1</sup>. Furthermore, jewellery supply chains are often very diverse and, in many cases, fragmented, with different segments of the industry operating in different locations, and business and regulatory environments. However, companies of all types and scales will need to acknowledge - and respond to - a shift in focus, moving from supply chain risk management practices, which primarily seek to minimise negative impacts, to a more expansive consideration of positive sectoral impacts that can contribute to wider social and environmental progress,

Integral to this broader view of the ESG landscape are the United Nations' Sustainable Development Goals (SDGs). These 17 interconnected objectives provide a comprehensive blueprint to achieve a more sustainable future, addressing a range of global challenges from poverty and inequality to environmental degradation. For businesses in the jewellery sector, aligning with the SDGs serves a dual purpose. Firstly, it signifies a commitment to addressing pressing global issues. Secondly, it provides a strategic framework to drive long-term growth, resilience, and stakeholder trust.

Moreover, the regulatory backdrop is becoming more stringent. The emphasis on due diligence regulations is growing, requiring companies to identify, address, and mitigate risks within their supply chains<sup>2</sup>. A case in point is the EU Conflict Minerals Regulation, designed to stem the trade in certain 'conflict minerals', including gold, from particularly troubled and unstable regions where the mining and trading of such minerals is often unregulated and potentially associated with conflict and human rights abuses. This regulation followed, and in many ways mirrored, the earlier Section 1502 of the U.S. Dodd Frank Act, which rapidly became a landmark law and signaled a broader movement towards greater transparency and responsible sourcing in minerals supply chains.

Other emerging regulations include the EU Corporate Sustainability Due Diligence Directive (CSDDD) and the German Supply Chain Due Diligence Act, which will require larger companies to identify and, where applicable, mitigate negative environmental and/or

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<sup>1</sup> The challenge for fine jewellery SMEs to establish their ESG credentials has, for some years, been flagged as requiring special attention – see, for example, *The Fine Jewellery Industry: Corporate Responsibility Challenges and Institutional Forces Facing SMEs* (2016), Journal of Business Ethics; <https://link.springer.com/article/10.1007/s10551-016-3071-4>

<sup>2</sup> *Supply Chain Due Diligence: New Regulations and What You Need to Do* (2023), Supply Chain Management Review; <https://www.scmr.com/article/supply-chain-due-diligence-new-regulations-and-what-you-need-to-do>

human rights impacts in their supply chains. Although the scope of such regulations will not directly include all companies, such as SME's, the indirect impacts will be felt across the supply chain in the form of additional due diligence and reporting requirements that are passed up the supply chain by larger companies and brands further downstream. The reality is that companies are now responsible not only for their immediate operations but also for actions deep within their supply chains.

Compounding these regulatory and strategic imperatives is the rising tide of consumer awareness. Consumers are increasingly educated and concerned about the potential and actual negative social and environmental impacts associated with the jewellery supply chain and, as a result, are favouring brands that act responsibly, value diversity, and have a compelling brand presence both online and offline<sup>3</sup>. This heightened awareness is being driven, in part, by increased scrutiny from NGOs and the broader media, spotlighting issues ranging from unethical labour practices to environmental degradation. As this trend intensifies over the next 5-10 years, it will necessitate a new landscape of transparency and supply chain due diligence for companies in the jewellery industry. Adaptation to this changing environment will not be optional for those seeking to remain competitive and relevant. Businesses will need to proactively demonstrate their commitment to responsible practices, not only to comply with regulations but also to meet the growing expectations of a conscientious consumer base. This 'sustainability surge' is expected to result in a dramatic growth in fine jewellery purchases influenced by sustainability considerations. By 2025, an estimated 20 to 30 percent of global jewellery sales will be influenced by sustainably minded consumers<sup>4</sup>.

In concluding this introduction, it is important to underscore the vital role of transparency in the jewellery supply chain, particularly regarding the use of sustainability claims. The rising consumer consciousness and regulatory focus on ethical sourcing and environmental stewardship place a significant onus on companies to not only adopt sustainable practices but also to communicate them truthfully and transparently.

The integrity of sustainability claims has never been more scrutinised. Claims of 'ethical sourcing', 'sustainable materials', or 'low environmental impact' must be substantiated with verifiable evidence. This is not only a matter of regulatory compliance but a fundamental aspect of building and maintaining consumer trust. In an era where information is abundantly accessible, unsubstantiated claims can quickly lead to

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<sup>3</sup> *In fine jewellery and watches, sustainability shines through* (2021), McKinsey & Company; <https://www.mckinsey.com/industries/retail/our-insights/in-fine-jewellery-and-watches-sustainability-shines-through>

<sup>4</sup> *State of Fashion: Watches and Jewellery* (2021), McKinsey & Company; <https://www.mckinsey.com/industries/retail/our-insights/state-of-fashion-watches-and-jewellery>

accusations of greenwashing, potentially causing irreparable damage to a company's reputation<sup>5</sup>.

Therefore, it becomes increasingly clear that sustainability in the jewellery sector must be underpinned by a commitment to responsible marketing and transparent reporting. Companies must be diligent in ensuring that their sustainability narratives are backed by tangible actions and verifiable data. This commitment to authenticity in sustainability reporting and communication will not only safeguard against the risks of greenwashing but will also strengthen the industry's overall credibility and trustworthiness, paving the way for a more sustainable and responsible future in the jewellery sector.

## 2. Purpose and scope

This roadmap aims to provide clarity and direction for industry associations and companies throughout the jewellery supply chain over the next 5-10 years. The objective is to condense the vast array of ESG topics into a structured and prioritised framework tailored to the specific needs and characteristics of the jewellery sector. Taken as a whole, the document should offer a clear set of reference points to enable CIBJO members to focus their resources on the most material ESG issues in an efficient and effective manner.

Smaller enterprises, in particular, should find this document to be a useful guide. While they often face challenges regarding resources and capacity, their role in the supply chain is pivotal. This roadmap aims to provide them with a strategic perspective, highlighting areas of focus that align with global sustainability frameworks, like the UN's SDGs, the emerging regulatory environment, and the expectations of customers, consumers and other industry stakeholders.

However, the early stages in a company's 'sustainability journey' often centre on its efforts to ensure it understands the risks and pressure points in its supply chain. This means building capacity and embedding good practice on responsible sourcing policies and processes into core business operations, as summarised below.

## 3. Building on Responsible Sourcing good practice

A foundational step that is required of all jewellery companies, as a pre-requisite to any wider consideration of social and environmental 'externalities', is to first ensure they have undertaken the due diligence necessary to ensure the integrity of their supply chains. To assist in this and support ongoing progress, CIBJO published (the first edition of) its

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<sup>5</sup> *The Crackdown on Greenwashing* (2023), KPMG: <https://kpmg.com/xx/en/home/insights/2023/04/the-crackdown-on-greenwashing.html>

*Responsible Sourcing Blue Book*<sup>6</sup>, which provides companies in the jewellery sector with structured guidance for implementing due diligence in the responsible sourcing of gemstones and precious metals. Additionally, CIBJO has also developed a toolkit, aligned with the aforementioned 'Blue Book', to offer further explanation and reference materials to assist companies in addressing the following key issues and steps<sup>7</sup>:

- 1 Establish and Implement a Responsible Supply Chain Policy
- 2 Supply Chain Due Diligence
- 3 Know Your Counterparty and Anti-Money Laundering
- 4 Know Your Counterparty and Bribery, Facilitation Payments
- 5 Risk Management for "Conflict-Free" Sourcing
- 6 Human Rights
- 7 Product Integrity
- 8 Early Warnings, Grievances and Whistle-Blowing
- 9 Responsible Sourcing Assurance and Certification

The significance of ensuring these fundamental issues have been addressed cannot be overstated and is worth repeating. Jewellery companies and associations planning to consider and identify their potential contributions to positive social and environmental outcomes (for example, as defined by the *UN Sustainable Development Goals* – see below), should first ensure they are confident they have implemented processes that strive to minimise their supply chain risks. The *CIBJO Responsible Sourcing Checklist*<sup>8</sup> can be used for this purpose. (See also *Appendix I*, below, for a summary of *CIBJO Responsible Sourcing Policy & Guidance*.)

It should also be noted that there are industry schemes and certification processes which seek to formalise and publicly validate a company's approach to responsible sourcing. Most such schemes are closely aligned with – and seek to operationalise – the OECD's *Due Diligence Guidance for Responsible Mineral Supply Chains*<sup>9</sup>.

The leading certification scheme in the jewellery sector is the Responsible Jewellery Council's Code of Practices (2019) Standard. However, companies that do not seek certification – perhaps because of location or scale - are still advised to become familiar with the context defined by the OECD's due diligence guidance and commence

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<sup>6</sup> *Responsible Sourcing Blue Book* (2018), CIBJO; <https://www.cibjo.org/rstoolkit/wp-content/uploads/2020/04/19-01-06-Responsible-Sourcing-Book-.pdf>

<sup>7</sup> <https://www.cibjo.org/rstoolkit/rs-toolkit/>

<sup>8</sup> The checklist can be found at the end of the *Responsible Sourcing Blue Book*

<sup>9</sup> <https://mneguidelines.oecd.org/an-international-standard-oecd-due-diligence-guidance-for-responsible-mineral-supply-chains.htm>

implementation of CIBJO's key responsible sourcing steps. (See also the comments in section 10, *Product Traceability and Chain of Custody*, below.)

## 4. The UN Sustainable Development Goals (SDGs) – a Blueprint for Progress

The Sustainable Development Goals (SDGs) constitute a global blueprint, adopted by the United Nations in 2015, to achieve a better and more sustainable future for all by 2030. These 17 interconnected goals address the major challenges of our time, including poverty, inequality, climate change, environmental degradation, peace, and justice. Although the SDGs were adopted almost a decade ago, progress towards achieving them has been slow and there is now an urgent need for businesses and world leaders to make a fundamental shift to avoid irreversible negative consequences to society, nature and biodiversity<sup>10</sup>. For businesses in the jewellery sector, aligning with the SDGs is not just a contribution to global efforts but a strategic alignment that can drive sustainable growth, innovation, and stakeholder trust.

**Strategic Relevance:** Aligning with the SDGs allows companies in the jewellery sector to focus on areas where they can have the most significant impact. This alignment can inform strategy, drive innovation, and open new markets.

**Risk Management:** Many of the challenges addressed by the SDGs, such as climate change and resource scarcity, pose direct risks to the jewellery sector. Addressing these can help mitigate risks and ensure long-term business resilience.

**Stakeholder Engagement:** Consumers, investors, and regulators increasingly expect businesses to demonstrate sustainability commitments. Aligning with the SDGs helps in meeting these expectations and enhancing brand reputation.

## 5. Developing an ESG Framework

The implementation of an effective ESG strategy requires a structured approach, ensuring that the strategy is not only well-conceived but also seamlessly integrated into all aspects of business operations. The following steps outline some of the high-level actions businesses in the jewellery sector can take to provide structure and direction to their ESG approach. These steps will be an important starting point and provide a foundation for long-term success, irrespective of the particular ESG topics a company decides to focus on.

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<sup>10</sup> *The Sustainable Development Goals Report - Special Edition (2023)*, United Nations; [https://sdgs.un.org/sites/default/files/2023-07/The-Sustainable-Development-Goals-Report-2023\\_0.pdf](https://sdgs.un.org/sites/default/files/2023-07/The-Sustainable-Development-Goals-Report-2023_0.pdf)



**Establish clear leadership and responsibility:**

- Assign a dedicated team or individual responsible for ESG initiatives. This could involve creating new roles or departments, or empowering existing staff with the responsibility and authority to lead ESG efforts.
- Ensure that this team has direct access to senior management and, potentially, the board, facilitating top-down support and bottom-up communication.
- If lacking internal knowledge, capacity or skills, consider using external ESG consultants to help you design and operationalise your ESG framework. However, strive to internalise and 'institutionalise' their guidance and inputs to reduce longer-term dependencies.

**Secure buy-in from senior management:**

- Engage senior leadership to secure their commitment and buy-in. The success of an ESG strategy often hinges on the active support and involvement of top management.
- Communicate the business case for ESG initiatives, including potential for risk mitigation, brand enhancement, customer satisfaction, and long-term profitability.

**Define clear objectives and purpose:**

- Establish clear, measurable objectives for the ESG strategy that align with both the company's business goals and broader sustainability frameworks like the UN SDGs.
- Develop a purpose statement for your ESG strategy that resonates with the company's mission and values, ensuring alignment and coherence.

**Align the business with key frameworks, standards and applicable regulations:**

- Integrate industry-specific and global frameworks and standards into the ESG strategy. This includes frameworks like the UN SDGs, the OECD Due Diligence Guidance for Responsible Business Conduct, the UN Guiding Principles on Business and Human Rights and industry standards such as those from the Responsible Jewellery Council (RJC), the Responsible Minerals (RMI) Initiative, the London Bullion Market Association (LBMA), and the World Gold Council (WGC), to name a few.
- Ensure compliance with international, national, and local regulations related to ESG aspects. Regularly review and adapt to changes in the legal landscape to maintain compliance.
- Be guided by industry associations and groups (such as the Watch & Jewellery Initiative 2030) which strive to demonstrate leadership and drive sectoral progress on key ESG and sustainability issues.

**Conduct a materiality assessment:**

- Perform a materiality assessment to identify and prioritise ESG issues most significant to your business and your stakeholders. Although this roadmap outlines some of the key priority areas that you should focus on, a materiality assessment will allow you to identify risks and opportunities that are specific to your business circumstances and your position in the supply chain.

**Review existing policies and procedures:**

- Identify what policies and procedures you might already have in place that are relevant to key ESG issues that impact your business.
- Determine if there is a gap between your existing policies and practices and the emerging expectations, targets and/or reporting requirements.
- If your company hasn't yet developed any ESG-relevant policies and procedures, assign responsibility internally to develop them. This could include a Materials Sourcing Policy/Supply Chain Policy, procedures for identifying ESG risks in the supply chain and/or a Supplier Code of Conduct. Ensure that the policies and procedures you develop align with your overall ESG priorities and strategy.
- Make sure that your company policies and procedures are endorsed at the highest level of the business and that a mechanism is in place to monitor implementation and effectiveness.

**Integrate ESG into corporate strategy:**

- Ensure that ESG considerations are integrated into the broader corporate strategy, business planning, and decision-making processes.
- Develop your own roadmap with short-term and long-term goals, including specific targets and key performance indicators (KPIs) and metrics, with target dates/timelines, to measure progress.

**Supplier and stakeholder engagement:**

- Communicate ESG expectations clearly to suppliers and other stakeholders. Incorporate ESG criteria into supplier selection, evaluation, and contracting processes.
- Establish collaborative relationships with suppliers to support them in meeting these criteria, recognising that building a sustainable supply chain is a shared responsibility.

**Training and capacity building:**

- Invest in training and capacity building for employees at all levels to ensure they understand the importance of ESG and their role in implementing the strategy.
- Develop training programs tailored to different roles and levels within the organisation.

### **Monitor, report, and communicate:**

- Establish robust mechanisms for monitoring and reporting on ESG performance. Regularly review and update your company's progress against its ESG objectives. Consider following established reporting standards, such as those from the International Sustainability Standards Board (ISSB) or Global Reporting Initiative (GRI). If your capacity is limited, which is not unlikely for most SMEs, strive to align your company disclosures with the 'spirit' and structure of these standards, even if you do not (or are not immediately able) to fully adhere to them. However, all claims or statements of progress need to be evidenced with clear and credible metrics and supportive data.
- Communicate transparently, both internally and externally, about progress, challenges, and learnings. Stakeholder communication should be honest, clear, and consistent.

### **Continuous improvement and adaptation:**

- Foster a culture of continuous improvement, encouraging feedback and innovation in ESG practices.
- Regularly review and adapt the ESG strategy in response to new challenges, opportunities, and evolving best practices.

## **6. ESG Priorities, Methodology and Approach**

The ESG priority topics selected for this roadmap are re-categorised<sup>11</sup> under the summary headings of:

- **People**
- **Planet**
- **Product**

The significance of good practice in corporate governance, in order to ensure effective company contributions to sustainability goals, is not underestimated here<sup>12</sup>, but the focus on product provenance and integrity was deemed of particular relevance to the jewellery industry.

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<sup>11</sup> This approach is wholly compatible with how other industry organisations are seeking to define and classify wider positive impacts – see, for example, the RJC's '*five pillars of sustainable development*' in its '*Roadmap to 2030*'; <https://www.responsiblejewellery.com/wp-content/uploads/RJC-2030-Roadmap-narrative-Dec-2020-v1.3.pdf>

<sup>12</sup> For wider context, see, for example: for example, *Sustainability and Corporate Governance: Theoretical Development and Perspectives* (2016), M. Jaimes-Valdez & C. Jacobo-Hernandez, *Journal of Management and Sustainability*, and *Defining the 'G' in ESG Governance Factors at the Heart of Sustainable Business* (2022), WEF

The factors for further consideration outlined in *Table 1*, below, were chosen based on a review and analysis of the following key factors:

**Benchmarks from industry leaders:** A review of publicly available sustainability reports and materiality assessments from a number of leading jewellery brands. Their current commitments and disclosures provided invaluable insights into best practices and evolving norms within the industry.

**Emerging standards and regulatory landscape:** The trajectory of sustainable business is increasingly shaped by voluntary standards as well as regulations that demand social and environmental compliance. The roadmap considers how frameworks, standards and regulations are shaping the sustainability landscape within the jewellery sector.

**Alignment with the UN SDGs:** Aligning the roadmap with specific SDGs, will help to ensure that the jewellery sector's journey towards sustainability contributes meaningfully to the world's collective mission. ESG topics have also been selected based on their relevance to key SDGs.

**Table 1: Jewellery industry ESG priorities**

Priority ESG topics	Category	Scope and description
Human Rights and Labour Practices	People	Addresses the ethical treatment and welfare of workers throughout the jewellery supply chain. This includes ensuring fair labour practices, safe working environments, and the protection of fundamental human rights at every stage, from raw material extraction to final product assembly and retail.
Inclusion, Diversity and Employee Wellbeing	People	Focuses on fostering an equitable and inclusive environment within the workplace. This encompasses embracing diversity in all its forms - gender, race, ethnicity, age, sexual orientation, and disability - both within organisational structures and in broader business practices.
Climate Change and Energy	Planet	Addresses the impacts of business operations on climate change – typically, with a focus on energy consumption. This involves assessing and reducing greenhouse gas (GHG) emissions, implementing energy-

		<p>efficient practices, and transitioning to renewable energy sources. It underscores the necessity for businesses to mitigate their carbon footprint and contribute to global efforts against climate change. For supply chain participants that regularly interact with communities in potentially vulnerable locations, actions to support resilience against the local physical impacts of climate change can also produce</p>
<b>Waste and Circularity</b>	<b>Planet</b>	<p>Examines the strategies and practices for effectively managing waste generated by business operations. This includes reducing waste production, promoting recycling and reuse, and ensuring the responsible disposal of waste. Plans often emphasise the importance of minimising environmental impact through sustainable waste management practices. The topic also refers to the adoption of circular economy principles in business practices, particularly focusing on the use of sustainable materials. In the context of jewellery, this includes the utilisation of recycled precious metals and the integration of circular economy concepts into aspects like packaging design.</p>
<b>Nature and Biodiversity</b>	<b>Planet</b>	<p>Focused on the identification, assessment, and management of the ecological footprint across the entire supply chain. Plans often highlight the importance of understanding and mitigating environmental impacts such as resource depletion, pollution, and habitat destruction that can occur at various stages of the supply chain, from raw material extraction to manufacturing and distribution. It underscores the need for a comprehensive approach to environmental stewardship throughout the supply chain.</p>
<b>Traceability</b>	<b>Product</b>	<p>Centers on the capability to trace the journey of raw materials from their origin through the entire supply chain. This is vital for the broader due diligence work related to human rights and environmental impacts in the supply chain. Effective traceability ensures</p>

		transparency and accountability, enabling businesses to verify that their materials are responsibly produced and sourced.
<b>Responsible Marketing and Transparency</b>	<b>Product</b>	This involves taking a responsible approach to promoting products, particularly in the context of sustainability claims. It highlights the importance of credible, honest and transparent communication regarding a company's sustainability commitments and achievements. It emphasises the need for businesses to avoid overstating or misrepresenting their environmental and ethical practices – a practice commonly known as greenwashing. Instead, companies should aim for clarity, accuracy, and authenticity in their marketing, ensuring that all sustainability claims are substantiated by tangible actions and verifiable data.

**6.1. Industry approaches, guidance, and reference materials**

The jewellery sector’s growing awareness of how ESG and sustainability objectives can be ‘mainstreamed’ in industry plans and priorities is evident in the broadening scope and recent key outputs from industry associations such as the *Responsible Jewellery Council*<sup>13</sup> and the *Watch & Jewellery Initiative 2030*<sup>14</sup>. Both these organisations have sought to identify key priorities and areas of focus, and both have also signalled their intent to offer the industry further guidance and tools<sup>15</sup>. It is expected that these developing resources will likely be aligned and compatible with the content and suggestions presented in this document.

Similarly, recent work from within CIBJO<sup>16</sup> has produced a very useful mapping of the UN SDGs aligned to a set of 14 ESG Principles (as illustrated in *Figure 1*, below), and these Principles, and the associated guidance on their implementation, should be viewed as wholly complementary to the issues and proposed actions described below.

<sup>13</sup> See, for example, the RJC’s *Roadmap to 2030 and Beyond* (2023); <https://responsiblejewellery.com/wp-content/uploads/RJC-2030-Roadmap.pdf>

<sup>14</sup> The mission statement of the WJI2030 can be viewed as a reflection of this shift from a narrower focus on supply chain risk management to an acknowledgement of wider social and environmental challenges: “*To unite Watch & Jewellery brands committing to ambitious goals while collaborating on projects that deliver impact all along the value chain.*”; <https://www.wjinitiative2030.org/about/>

<sup>15</sup> See, for example, the WJI2030’s *Human Rights Navigator*; <https://www.wjinitiative2030.org/human-rights-navigator/>

<sup>16</sup> The 14 ‘ESG Principles’ referenced alongside United Nations’ 17 Sustainability Development Goals (defined as *CIBJO’s Environmental, Social & Governance Principles for Laboratory-Grown Diamonds*) are, for the most part, broadly applicable to the wider jewellery sector and should be viewed as wholly compatible with the guidance offered here.

**Figure 1: CIBJO's ESG Principles and UN Sustainable Development Goals Mapping<sup>17</sup>**

14 Principles referenced alongside 17 UN SDGs:



<sup>17</sup> <https://cibjo.org/wp-content/uploads/2024/01/CIBJO-ESG-Principles-CIBJO-Congress-2023.pdf>



In addition, and as a further indication of the increased convergence and sectoral collaboration on supply chain responses to ESG and sustainability objectives, the gold industry, alongside the aforementioned jewellery groups, has come together to commit to a Gold Industry Declaration of Responsibility & Sustainability Principles<sup>18</sup>. The 10 Principles reflect the main material ESG factors and goals that 14 key global industry associations and exchanges have agreed to focus on, with the intention of contributing to demonstrable positive progress.

#### GOLD INDUSTRY SUSTAINABILITY PRINCIPLES

The gold industry commits to operating responsibly and sustainably to deliver progress on the following issues:

1. Responsible Sourcing
2. Sustainable Development Goals (SDGs)
3. Human Rights
4. Diversity, Equity, and Inclusion
5. Indigenous Peoples and Vulnerable Populations
6. Climate Change Reporting
7. Climate Change Emissions Reduction
8. Formalisation of Artisanal and Small-Scale Gold Mining (ASGM)
9. Industry-wide Collaboration
10. Reporting on Progress

The subsequent chapters of this report will explore the key ESG issues predicted to influence the jewellery industry the most over the next 5-10 years. By addressing these topics, industry professionals can ensure that their operations not only meet regulatory requirements but also align with broader global sustainability goals, thereby enhancing their overall value proposition in a competitive market.

Each chapter will include:

- An **overview** of the topic/issue;
- Best/good practice **recommendations**<sup>19</sup>;
- A summary of relevant **topic-specific SDGs**; and
- An update on **relevant frameworks, initiatives and regulations** that are driving change on the topic.

<sup>18</sup> <https://www.gold.org/gold-industry-declaration>

<sup>19</sup> The terms 'best practice' and 'good practice' are used here to refer to what might also be called "proven practices"; they do not assert that an approach is the ideal and will lead to the best achievable outcome, but, rather, seek to indicate that an approach has been tried successfully and is relevant for consideration in this context.



## 7. People

### 7.1. Human Rights and Labour Practices

This section explores the crucial area of human rights and labour practices, focusing on their relevance and impact within the jewellery sector. It acknowledges the multifaceted nature of human rights and labour practice risks, which not only relate to a company's own operations but also extend deep into the layers of the supply chain. The importance of this topic stems from the ethical imperative to uphold human dignity and rights in all business practices, a principle increasingly enshrined in law and regulation<sup>20</sup>.

Human rights and labour practices are integral to the sustainable and ethical operations of any business, especially in an industry like jewellery, which often deals with intricate and layered supply chains. The jewellery sector faces unique challenges in this regard, given its global reach and the diverse nature of its supply chain.

To address human rights and labour practice issues in the jewellery industry, companies need to adopt a holistic approach. This entails considering not only the direct operations of the company but also the extensive networks of suppliers, which often extend into higher tiers and across international borders. A significant challenge arises in parts of the supply chain located in countries where worker protections may be weaker or regulatory oversight is less stringent. In these contexts, risks related to human rights and labour practices can be more pronounced and harder to monitor.

For the jewellery industry, the mining sector represents a critical area of focus and, often, concern. Although the formal, industrialised mining sector is heavily regulated and can increasingly demonstrate its responsibility and sustainability credentials<sup>21</sup>, substantial materials are still sourced from the informal and sometimes illegal Artisanal and Small-scale Mining (ASM) sector, especially prevalent in the extraction of coloured gemstones. It is estimated that around 80% of coloured gemstone (and 20% of gold) production stems from ASM, a sector that, while vital for local economies and livelihoods, is often mired in significant environmental, human rights and labour challenges, including but not limited to forced labour, child labour, and hazardous working conditions<sup>22</sup>.

Given these complexities, it is imperative for companies to take a comprehensive view of their supply chain. Identifying where the risks lie, especially in the higher tiers, requires

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<sup>20</sup> *Human Rights Due Diligence Challenges for Business* (2023), The Global Business Initiative; <https://gbih.org/updates/human-rights-due-diligence-challenges-for-business>

<sup>21</sup> See, for example, the World Gold Council's *Responsible Gold Mining Principles*, the ICMM's *Mining Principles*, the Mining Associations of Canada's *Towards Sustainable Mining*, and IRMA's *Standard for Responsible Mineral Exploration and Development*

<sup>22</sup> *Hands That Dig, Hands That Feed: Lives Shaped by Coloured Gemstone Mining*, The Gemstones and Jewellery Community Platform; [https://www.gemstones-and-jewellery.com/white\\_papers/hands-that-dig-hands-that-feed-lives-shaped-by-coloured-gemstone-mining/](https://www.gemstones-and-jewellery.com/white_papers/hands-that-dig-hands-that-feed-lives-shaped-by-coloured-gemstone-mining/)

thorough due diligence and an understanding of the local contexts in which their suppliers operate. The need for such an approach is further underscored by a growing body of international regulations and standards aimed at ensuring responsible business practices concerning human rights and labour. Companies are increasingly expected to demonstrate not just compliance, but proactive engagement in identifying, preventing, and addressing risks throughout their supply chain.

When considering human rights and labour practices in the jewellery sector, companies must be cognisant of a broad spectrum of risks, which include, but are not limited to the following key areas:

**Forced Labour:** This includes any form of involuntary or coerced labour, a risk particularly high in certain sourcing and manufacturing regions across Asia. The International Labour Organization (ILO) Forced Labour Convention, 1930 (No. 29) defines forced labour as “all work and service which is exacted from any person under the threat of penalty and for which the person has not offered himself or herself voluntarily<sup>23</sup>”. Groups particularly vulnerable to involuntary work include migrants, women, girls, individuals with disabilities, and those from minority religious and ethnic communities. These populations are more frequently subjected to coercion into forced labour. Such exploitation is commonly rooted in conditions of poverty, insufficient availability of stable employment and educational opportunities, lax enforcement of laws, prevalent corruption, and economies that rely heavily on low-wage labour<sup>24</sup>. It's crucial to recognise, however, that forced labour is not exclusive to developing regions and can also manifest in advanced economies.

**Child Labour and use of Young Workers:** The term ‘child labor’ can be defined as work that deprives children of their childhood, their potential for dignity and that is harmful to their physical and/or mental development<sup>25</sup>. The most severe forms of child labour involve children being subjected to enslavement, separated from their families and being exposed to significant hazards and illnesses, often from a very young age. Not all work undertaken by children is classified as child labour, and not all child labour is categorised as the worst forms. Children who are of legal working age and engaged in activities (i.e., as young workers) that do not adversely affect their health, both physical and mental, their development, or their education, can gain beneficial skills and valuable work experience. Nevertheless, it is crucial to remember that young workers are still in stages of physical, mental, and emotional development. Compared to adults, they are more vulnerable to hazardous substances and environments and are more inclined to engage in risky behaviour.

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<sup>23</sup> *What is forced labor, modern slavery and human trafficking.* The International Labour Organization (ILO); <https://www.ilo.org/global/topics/forced-labour/definition/lang--en/index.htm>

<sup>24</sup> *What is forced labor?* Anti-Slavery International; <https://www.antislavery.org/slavery-today/forced-labour/>

<sup>25</sup> *What is child labour?* The International Labour Organization (ILO); <https://www.ilo.org/ipec/facts/lang--en/index.htm>

**Excessive Working Hours:** Excessive working hours coupled with insufficient rest and recovery time can harm workers' health and heighten the likelihood of accidents at work. The International Labour Organization (ILO) has established standards on working time, which offer guidelines for regulating work hours, daily and weekly rest periods, as well as annual leave. In most countries, legal limits on weekly working hours are set at 48 hours or fewer (or 60 hours including overtime), and the actual normal hours worked per week typically fall below the 48-hour benchmark set by ILO conventions. These limitations are designed to enhance productivity while protecting the physical and mental well-being of workers<sup>26</sup>. Owing to its seasonal characteristics, employees in the jewellery industry often face extended working hours, especially in the midstream and downstream parts of the supply chain. Frequently, workers might opt for longer hours to boost their earnings. Still, it remains crucial for employers to implement working hour limits to maintain their workforce's well-being and to comply with relevant local laws.

**Poor Health and Safety Practices:** Inadequate safety measures in mining or manufacturing processes pose significant worker risks. According to International Labour Organization (ILO) statistics, approximately 2.7 million deaths annually are attributed to work-related accidents<sup>27</sup>. Numerous countries have established health and safety legislation mandating businesses to enact measures to manage and reduce risks associated with workplace dangers, injuries, and illnesses. Nevertheless, the extent and enforcement of these regulations differ considerably across countries, and in certain instances, they may not be effectively implemented. Implementing robust health and safety management systems offers advantages not just to workers, but also to employers. Such systems lead to a reduction in workplace injuries and illnesses, resulting in fewer days off sick, diminished risk of insurance claims and penalties, and an overall enhancement in worker motivation and performance. For employers, these measures are beneficial in maintaining a healthier, more efficient workforce and mitigating potential financial and legal liabilities.

**Human rights risks in Conflict-Affected and High-Risk Areas (CAHRAs):** Some materials used in jewellery, such as gold, diamonds and coloured gemstones, are mined and/or transported through countries that are associated with armed conflict, widespread violence and serious human rights abuses. The extraction and trade of minerals and metals in these regions, known as Conflict-Affected and High-Risk Areas (CAHRAs), can exacerbate these negative impacts by providing a revenue source for illegal armed groups and perpetrators of human rights abuses. However, this is not necessarily always the case and jewellery materials can be sourced responsibly from CAHRAs, as long as this is done in accordance

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<sup>26</sup> Business and Working Time International Labour Organization (ILO); [https://www.ilo.org/empent/areas/business-helpdesk/WCMS\\_DOC\\_ENT\\_HLP\\_TIM\\_EN/lang-en/index.htm#:~:text=Most%20countries%20have%20statutory%20limits,workers%20physical%20and%20mental%20health.](https://www.ilo.org/empent/areas/business-helpdesk/WCMS_DOC_ENT_HLP_TIM_EN/lang-en/index.htm#:~:text=Most%20countries%20have%20statutory%20limits,workers%20physical%20and%20mental%20health.)

<sup>27</sup> International Labour Organization (ILO). International Labour Standards on Occupational Safety and Health. <https://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/occupational-safety-and-health/lang--en/index.htm>

with a robust and credible due diligence process<sup>28</sup>. It is estimated that around 80% of the world's supply of coloured gemstones and 20% of gold supply originates from Artisanal and Small-Scale Mining (ASM) operations, many of which are located in CAHRAs. Much of this sector is informal and unregulated and, therefore, at greater risk of exploitation from illegal armed groups and other negative actors in the supply chain. Given these risks, companies in the jewellery supply chain need to adopt robust due diligence processes that allow them to identify the origin of the jewellery materials in their supply chain and, where applicable, take steps to mitigate identified risks. The most widely used due diligence framework for addressing risks associated with minerals from CAHRAs is the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas<sup>29</sup>.

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<sup>28</sup> See, for example, the World Gold Council's *Conflict-Free Gold Standard* (2012); <https://www.gold.org/industry-standards/conflict-free-gold>

<sup>29</sup> <https://www.oecd.org/corporate/mne/mining.htm>

### 7.1.1. Best Practice Recommendations

#### **Best Practice: Human Rights and Labour Practices**

##### Internal Operations

**Human Rights and Labour Practice policies:** Develop comprehensive policies that cover all aspects of human rights and labour practices. Ensure these policies align with applicable laws and relevant international standards, including ILO conventions. Ensure that you have clear policies on working hours and overtime, procedures for verifying the ages of workers and controls to protect young workers from harm. Make sure that you have communicated terms and conditions of employment to all employees in alignment with applicable local law.

**Health and Safety programs:** Develop comprehensive health and safety programs tailored to the specific risks and nature of the work environment. Ensure you have conducted a documented health and safety risk assessment and implemented measures to mitigate identified health and safety risks.

**Pay and benefits review:** Actively monitor and address any disparities in pay and benefits within the organisation to ensure equity across all employee groups. This includes regular reviews of compensation structures and benefits packages to identify and rectify inequities based on gender, ethnicity, age, disability, or other factors.

**Employee education and training:** Provide training to employees and management on human rights, labour standards and workplace health and safety.

**Grievance mechanism:** Establish effective and confidential grievance mechanisms allowing employees to report violations without fear of retaliation.

**Internal auditing and monitoring:** Implement a robust internal audit system to monitor compliance with human rights and labour policies regularly. This should include checks for health and safety standards, working conditions, and employment practices.

#### **Best Practice: Human Rights and Labour Practices**

##### Supply Chain

**Supply Chain Policy:** Develop and publicly communicate a Supply Chain Policy that outlines your expectations of suppliers on the topic of human rights, responsible sourcing and labour practices.

**Supplier engagement:** Proactively communicate your policy expectations to suppliers and consider incorporating human rights and labour practice considerations into contracts and agreements with suppliers. Work collaboratively with suppliers to build their capacity to uphold human rights and labour standards. This may include training, resources, and ongoing support.

**Due Diligence and Risk Assessment:** Conduct thorough due diligence on suppliers to identify risks related to human rights and labour practices, especially in higher-risk regions or sectors. Use existing recognised due diligence frameworks such as the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas to help you with this. Make sure that your due diligence approach is aligned with applicable regulations and laws that apply to your business.

**Supplier Code of Conduct:** Create and enforce a Supplier Code of Conduct that includes specific requirements around human rights, labour practices and sourcing from CAHRAs. Verify compliance through desktop or independent on-site audits.

**Collaborative initiatives:** Engage with industry groups, NGOs, and other stakeholders in initiatives aimed at improving human rights and labour practices in the supply chain.

### 7.1.2. Alignment with the SDGs



Goal	Description
3 - Good Health and Well-being	Ensure healthy lives and promote well-being for all at all ages
8 - Decent Work and Economic Growth	Promote inclusive and sustainable economic growth, employment and decent work for all
10 - Reduced Inequalities	Reduce inequality within and among countries

## 16 - Peace, Justice and Strong Institutions

Promote just, peaceful and inclusive societies

The Sustainable Development Goals (SDGs) significantly contribute to shaping the global framework for human rights and labour practices. Key among these goals are SDG 8 (Decent Work and Economic Growth) and SDG 16 (Peace, Justice, and Strong Institutions), which directly address labour standards and human rights issues.

**SDG 3** focuses on ensuring healthy lives and promoting well-being for all, emphasising the importance of safeguarding workers' physical and mental health in the workplace. This encompasses the implementation of health and safety standards and the promotion of a balance that supports overall employee well-being.

**SDG 8** advocates for sustained, inclusive economic growth and decent work for all. It calls for the upholding of fair labour practices, including safe working conditions, reasonable work hours, equitable wages, and the elimination of forced and child labour, aligning with the ILO's standards.

**SDG 10** emphasises the reduction of inequalities within and among countries. In the business context, this goal promotes inclusive practices and equal opportunities, ensuring that all workers, regardless of their background, have access to fair employment and growth opportunities.

**SDG 16** aims to promote peaceful and inclusive societies, focusing on building effective, accountable institutions. For businesses, this translates into practices that support the rule of law, reduce corruption, and ensure transparency and accountability in upholding human rights.

### 7.1.3. Applicable Frameworks, Initiatives and Regulations

The following non-exhaustive list of international frameworks, initiatives and regulations are applicable to the topic of human rights and labour practices.

#### Global Frameworks and Initiatives:

- **United Nations Guiding Principles on Business and Human Rights (UNGPs):** a comprehensive set of guidelines for States and companies to prevent, address and remedy human rights abuses committed in business operations and the supply chain.

- **The Watch & Jewellery Initiative 2030 (WJI2030)'s Human Rights Navigator:** a toolkit that seeks to provides practical guidance, tools, and insights support respect and promote human rights in WJI2030 member operations and jewellery value chains<sup>30</sup>
- **International Labour Organization (ILO) standards:** legal instruments drawn up by the ILO's constituents (governments, employers and workers) and setting out basic principles and rights at work<sup>31</sup>. These ILO instruments cover a range of topics including, but not limited to, child labour, forced labour, freedom of association and collective bargaining and workplace health and safety. Companies can use the ILO Conventions as a guideline to ensure their policies and practices align with internationally recognised standards.
- **OECD Guidelines for Multinational Enterprises:** Recommendations for responsible business conduct in areas including employment and human rights<sup>32</sup>.
- **OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas:** provides detailed recommendations to help companies respect human rights and avoid contributing to conflict through their mineral purchasing decisions and practices. This Guidance is for use by any company potentially sourcing minerals or metals from conflict-affected and high-risk areas. The OECD Guidance is global in scope and applies to all mineral supply chains<sup>33</sup>.
- **Kimberley Process Certification Scheme (KPCS):** a commitment to remove conflict diamonds from the global supply chain through the Kimberley Process Certification Scheme (KPCS) under which States implement safeguards on shipments of rough diamonds and certify them as "conflict free"<sup>34</sup>. Conflict diamonds (also sometimes referred to as 'blood' diamonds) are defined by the Kimberley Process as rough diamonds used by rebel movements or their allies to finance armed conflicts aimed at undermining legitimate governments.

#### **Current and Emerging Regulation:**

- **EU Conflict Minerals Regulation (2021):** requires due diligence on supply chains for EU importers of Tin, Tantalum, Tungsten and Gold<sup>35</sup>. The regulation is aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas 5-Step Framework.

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<sup>30</sup> <https://www.wjinitiative2030.org/hrights-navigator/>

<sup>31</sup> <https://www.ilo.org>

<sup>32</sup> <https://www.oecd.org/corporate/mne/>

<sup>33</sup> <https://www.oecd.org/corporate/mne/mining.htm>

<sup>34</sup> <https://www.kimberleyprocess.com/>

<sup>35</sup> [https://policy.trade.ec.europa.eu/development-and-sustainability/conflict-minerals-regulation/regulation-explained\\_en](https://policy.trade.ec.europa.eu/development-and-sustainability/conflict-minerals-regulation/regulation-explained_en)



- **UK Modern Slavery Act (2015)** and **Australia’s Modern Slavery Act (2018)**: mandates annual disclosures on efforts to address modern slavery in business operations and supply chains for in-scope companies.
- **California Transparency in Supply Chains Act (2010)**: requires disclosure from in-scope businesses about efforts to eliminate slavery and human trafficking from direct supply chains.
- **German Supply Chain Due Diligence Act (2023)**: imposes obligations on large companies based in Germany with regard to human rights due diligence along the supply chain.
- **Norwegian Transparency Act (2022)**: requires certain companies in Norway to carry out due diligence activities to ensure they operate responsibly, respecting human rights and decent working conditions in their supply chain.
- **French Corporate Duty of Vigilance Law (2017)**: requires large companies in France to manage their human rights and environmental risks effectively – both within the company itself and also its subsidiaries, subcontractors and suppliers.
- **EU Corporate Sustainability Reporting Directive (CSRD) (2024)**: requires large companies to publish regular reports on the social and environmental risks they face and on how their activities impact people and the environment<sup>36</sup>.
- **EU Directive on Corporate Sustainability Due Diligence (CSDD) (Proposed)**: will require large companies to conduct due diligence to identify, prevent, or mitigate adverse impacts on the environment and human rights<sup>37</sup>.

## 7.2. Diversity, Equity and Inclusion, and Employee Wellbeing

Diversity, equity and inclusion (often abbreviated as DEI), and employee well-being are increasingly recognised as pivotal elements of business strategy and corporate responsibility. Despite this, serious efforts to enhance workplace diversity and inclusion are still mostly limited to large multinational enterprises and brands<sup>38</sup>. Inclusion and diversity go beyond mere representation; they entail creating an environment where diverse perspectives and backgrounds are valued and where every individual feels empowered and respected. This is often articulated through policies on workplace equality and equity. The subtle difference between the terms can be described as follows: workplace equality strives for equal treatment and conditions, whereas workplace equity strives for equal *outcomes*, recognizing that employees may start from different positions and need different levels of support and resources to ensure equality of opportunity.

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<sup>36</sup> [https://finance.ec.europa.eu/regulation-and-supervision/financial-services-legislation/implementing-and-delegated-acts/corporate-sustainability-reporting-directive\\_en](https://finance.ec.europa.eu/regulation-and-supervision/financial-services-legislation/implementing-and-delegated-acts/corporate-sustainability-reporting-directive_en)

<sup>37</sup> [https://commission.europa.eu/business-economy-euro/doing-business-eu/corporate-sustainability-due-diligence\\_en](https://commission.europa.eu/business-economy-euro/doing-business-eu/corporate-sustainability-due-diligence_en). See also, *Making mandatory human rights and environmental due diligence work for all* (2022); [https://international-partnerships.ec.europa.eu/system/files/2022-12/making-mandatory-human-rights-and-environmental-due-diligence-work-for-all-summary\\_en.pdf](https://international-partnerships.ec.europa.eu/system/files/2022-12/making-mandatory-human-rights-and-environmental-due-diligence-work-for-all-summary_en.pdf)

<sup>38</sup> *Greater progress on diversity and inclusion essential to rebuild productive and resilient workplaces* (2022), International Labour Organisation (ILO); [https://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS\\_841085/lang--en/index.htm](https://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS_841085/lang--en/index.htm)

Employee well-being, integral to these goals, focuses on ensuring the mental, physical, and emotional health of the workforce, acknowledging that a supported and healthy employee is more engaged and productive.

The importance of focusing on these areas stems from both ethical considerations and business efficiency. Diverse and inclusive workplaces are shown to be more creative, adaptable, and successful<sup>39</sup>. In recent years, there has been a notable global trend towards increased inclusivity and diversity within larger businesses. This trend is expected to continue and even intensify in the coming decade, driven by societal shifts, evolving employee expectations, and a growing understanding of the value diversity brings to business performance.

However, it is important to recognise the variations in how inclusion and diversity are approached across different regions and cultures. What constitutes inclusion in one part of the world may differ in another, influenced by local cultural norms, legal frameworks, and historical contexts. For instance, gender equality initiatives might be at different stages of development and acceptance across various countries. Similarly, practices surrounding the integration of differently-abled individuals or the LGBTQ+ community in the workplace can vary significantly.

This global diversity in approaches to inclusion and diversity presents both a challenge and an opportunity for international businesses. It requires a nuanced understanding of local contexts and a flexible approach to policy and practice implementation. Moving forward, successful businesses will be those that not only commit to inclusion, diversity, and employee well-being as core values but also adeptly navigate and respect the global tapestry of cultural differences in these areas.

### 7.2.1. Best Practice Recommendations

<p style="text-align: center;"><b>Best Practice: Diversity, Equity and Inclusion, and Employee Wellbeing</b></p> <p><b>Inclusive leadership and culture:</b> Cultivate a leadership team that values and demonstrates a commitment to inclusion and diversity, increase diversity in key management positions in terms of gender, age, race, religion, sexual orientation, and other demographics, and foster a company culture where all employees feel valued and included, irrespective of their background. (Practices and priorities may, however, vary given local and cultural differences and sensitivities, as mentioned above.)</p>
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<sup>39</sup> *Transforming Enterprises through Diversity and Inclusion* (2022), International Labour Organisation (ILO) [https://www.ilo.org/wcmsp5/groups/public/---ed\\_dialogue/---act\\_emp/documents/publication/wcms\\_841348.pdf](https://www.ilo.org/wcmsp5/groups/public/---ed_dialogue/---act_emp/documents/publication/wcms_841348.pdf)

**Identify 'levers for change' via supplier engagement and procurement practices:** The UN's WEPs Gender-Responsive Procurement Assessment Tool<sup>40</sup>, piloted recently with the WJI 2030<sup>41</sup>, offers a good example of one such 'lever'.

**Diversity training and awareness programs:** Implement regular diversity training and awareness programs to educate employees (and senior management) about inclusion, unconscious bias, and cultural competency.

**Targets:** Set business targets to improve workforce diversity at all levels of the business.

**Equal pay, and equitable recruitment and promotion practices:** Define a clear equal pay policy which staff can easily understand, representing your firm commitment to offering equal pay (and terms and conditions) for equal work. Develop recruitment and promotion practices that ensure equal opportunities for all, actively seeking to diversify the workforce. Implement mentorship and sponsorship programs to support the career advancement of underrepresented groups.

**Committees:** Establish a Diversity, Equity and Inclusion, and Employee Wellbeing Committee or Council to help steer your business strategy on this topic, ensuring that the committee includes representation from different levels of the business.

**Be open to hearing feedback from your employees:** Being more diverse and inclusive includes listening to what your employees are looking for from you as a company and how they want to see change happen. Conduct regular assessments to gauge the effectiveness of inclusion and diversity initiatives and gather employee feedback.

**Advertising and communication:** Increase diverse representation in advertising and marketing materials and engage in social media activities that support and engage with key annual events such as Pride, International Women's Day and Black History Month, to name a few. These public communications should, however, be credible and authentic expressions of corporate policy and culture.

**Flexible working arrangements:** Offer flexible working options to accommodate different needs, such as part-time roles, remote work, flexible hours, and cultural and religious holidays, contributing to a better work-life balance for employees.

**Health and well-being programs:** Implement comprehensive health and well-being programs, including access to mental health resources, wellness initiatives, and regular health check-ups.

**Transparent communication and reporting:** Communicate openly about the company's diversity and inclusion goals, initiatives, and progress. Include diversity and inclusion metrics in corporate reporting.

**Zero tolerance for discrimination and harassment:** Establish and enforce strict policies against discrimination and harassment, ensuring a safe and respectful workplace for all employees.

## 7.2.2. Alignment with the SDGs



Goal	Description
<b>5 - Gender Equality and Women's Empowerment</b>	Achieve gender equality and empower all women and girls
<b>8 - Decent Work and Economic Growth</b>	Promote inclusive and sustainable economic growth, employment and decent work for all
<b>10 - Reduced Inequalities</b>	Reduce inequality within and among countries

The Sustainable Development Goals (SDGs) play a critical role in shaping the global agenda on inclusion, diversity, and well-being. These goals, particularly SDG 5 (Gender Equality), SDG 8 (Decent Work and Economic Growth), and SDG 10 (Reduced Inequalities), directly address aspects of equality and inclusivity. They emphasise the importance of creating equitable opportunities for all, irrespective of gender, race, ethnicity, or socio-economic background.

**SDG 5** focuses on achieving gender equality and empowering all women and girls, highlighting the necessity of breaking down barriers to gender parity in the workplace.

**SDG 8** promotes sustained, inclusive economic growth, full and productive employment, and decent work for all, which encompasses the provision of safe, secure, and well-compensated work environments.

**SDG 10** emphasises reducing inequalities within and among countries, advocating for inclusive societies where diversity is embraced and valued.

<sup>40</sup> <https://www.weps.org/resource/weps-gender-responsive-procurement-assessment-tool>

<sup>41</sup> See *Advancing Gender Equality Through Gender Responsive Procurement In The Watch And Jewelry Industry* (2023), UN Women & WJI2030; <https://www.wjinitiative2030.org/wp-content/uploads/2023/09/WJI-2030-X-UN-Women-Pilot-Report-2023.pdf>

### 7.2.3. Applicable Frameworks, Initiatives and Regulations

The following non-exhaustive list of international frameworks, initiatives and regulations are applicable to the topic of Inclusion, Diversity and Employee Wellbeing.

#### Global Frameworks and Initiatives:

- **International Labour Organisation (ILO) standards:** ILO standards on equality of opportunity provide tools to eliminate discrimination in all aspects of work and in society as a whole. They also provide the basis upon which gender mainstreaming strategies can be applied in the field of labour.
- **The Women's Empowerment Principles:** a joint initiative of the UN Global Compact and UN Women, were developed in 2010 to provide a holistic framework to empower women and girls in the workplace, marketplace, and community<sup>42</sup>.
- **Workplace Pride:** is a not-for-profit foundation dedicated to improving the lives of Lesbian, Gay, Bisexual, Transgender, Intersex, and Queer (LGBTIQ+) people in workplaces worldwide<sup>43</sup>.
- **Equal Pay International Coalition (EPIC):** Led by the ILO, UN Women, and the OECD. The Coalition aims to achieve equal pay for women and men everywhere<sup>44</sup>. By bringing together a diverse set of actors with different areas of focus and expertise, EPIC supports governments, employers, workers, and their organisations to make concrete and coordinated progress towards this goal.

#### Current and Emerging Regulation:

- **The US Civil Rights Act (1964), as amended:** prohibits discrimination based on race, colour, religion, sex, or national origin.
- **The Americans with Disability Act (1990):** a civil rights law that prohibits discrimination based on disability.
- **EU Anti-discrimination Directives:** Encompasses various directives that prohibit discrimination based on religion or belief, sex, disability, age, ethnicity and sexual orientation.
- **Work-Life Balance Directive (2019/1158):** Aims to support work-life balance for parents and carers, promoting equal opportunities and access to the labour market.
- **UK Equality Act 2010:** Consolidates anti-discrimination laws, providing protection against discrimination on various grounds, including age, disability, gender reassignment, race, religion or belief, sex, and sexual orientation.

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<sup>42</sup> <https://www.weps.org/>

<sup>43</sup> <https://workplacepride.org/>

<sup>44</sup> <https://www.equalpayinternationalcoalition.org/>

## 8. Planet

### 8.1. Climate Change and Energy

The issue of Climate Change is at the forefront of global sustainability challenges, encompassing a wide range of environmental, social, and economic concerns. Central to this is the pressing need to address human-induced climate change via the transition to sustainable low carbon energy sources, a key component of the United Nations' 2030 Sustainable Development Goals (SDGs), particularly SDG 7 (Affordable and Clean Energy) and SDG 13 (Climate Action). The adverse impacts of climate change are far-reaching, extending beyond extreme weather and environmental degradation to affect social and economic structures worldwide<sup>45</sup>.

Climate change is intrinsically linked with a variety of other critical issues, such as resource scarcity, biodiversity loss, poverty and (in)equality. These phenomena have profound implications not only for the natural world but also for human societies, impacting health, livelihoods, food security, and migration patterns. The interconnectedness of these issues highlights the complexity and urgency of addressing climate change as part of a broader sustainable development agenda.

Responding to climate change is not just an environmental responsibility but a strategic imperative for businesses of all sizes. Reducing carbon emissions and aligning with global climate goals is essential for sustainable growth and resilience. Businesses that proactively address climate change can mitigate risks, capitalise on new opportunities, and contribute to the global effort against this pressing challenge<sup>46</sup>.

The implications of climate change for businesses are significant. Supply chains are vulnerable to climate-induced disruptions, such as extreme weather events, which can lead to operational interruptions, increased costs, and market instability<sup>47</sup>. Moreover, there is a growing expectation from consumers, investors, and regulatory bodies for businesses to not only demonstrate their commitment to climate action, but also be able to provide evidence of their progress on contributing to decarbonisation and, where possible, local resilience. This includes transparent reporting, implementing strategies for reducing emissions, and investing in sustainable energy solutions and physical adaptation and resilience solutions.

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<sup>45</sup> See, for example, *Consequences of Climate Change*, European Commission; [https://climate.ec.europa.eu/climate-change/consequences-climate-change\\_en](https://climate.ec.europa.eu/climate-change/consequences-climate-change_en)

<sup>46</sup> *Businesses finding unexpected financial benefits from climate initiatives* (Press Release, 2022), EY; [https://www.ey.com/en\\_gl/news/2022/11/businesses-finding-unexpected-financial-benefits-from-climate-initiatives](https://www.ey.com/en_gl/news/2022/11/businesses-finding-unexpected-financial-benefits-from-climate-initiatives)

<sup>47</sup> *Could climate become the weak link in your supply chain?* (2020), McKinsey & Company; <https://www.mckinsey.com/capabilities/sustainability/our-insights/could-climate-become-the-weak-link-in-your-supply-chain>

The role of the Taskforce for Climate-related Financial Disclosures (TCFD) has been highly significant in catalysing corporate reporting on climate change business risks and impacts. While TCFD recommendations were primarily focused on finance and investor needs and perspectives, most subsequent reporting climate-focused reporting frameworks and associated regulatory obligations have very much mirrored the shape and focus of its guidance<sup>48</sup>.

### 8.1.1. Best Practice Recommendations

#### **Best Practice: Climate and Energy**

**Energy conservation measures:** Conduct energy audits to identify opportunities for energy savings in operations. Implement energy-efficient technologies and practices, such as LED lighting, energy-efficient appliances, and, where feasible, optimising manufacturing processes.

**Measure CO<sub>2</sub> emissions:** Take steps to measure your Scope 1, 2 and 3 carbon emissions.

**Reducing CO<sub>2</sub>e emissions:** Set clear 'science-based' targets for GHG emissions reduction aligned with established time-bound goals, such as those outlined by the Intergovernmental Panel on Climate Change (IPCC), most notably the aim of limiting global warming to 1.5 °C above pre-industrial levels. (See also the comments below on the SBTi's role in registering and validating company emission reduction targets<sup>49</sup>.)

**Use of renewable energy:** Shift towards renewable energy sources such as solar, wind, or hydroelectric power for business operations. Explore options for Renewable Energy Certificates (RECs) or Power Purchase Agreements (PPAs) to support renewable energy development.

**Addressing Scope 1 Emissions (Direct Emissions):** Implement measures to reduce direct emissions from owned or controlled sources, including company vehicles and facilities. Invest in technology upgrades that reduce direct emissions, such as energy-efficient heating and cooling systems.

**Addressing Scope 2 Emissions (Indirect emissions from purchased energy):** Purchase electricity generated from renewable sources to reduce indirect emissions associated with energy consumption. Work towards energy independence by investing in on-site renewable energy generation, such as the use of solar (photovoltaic) cells on building infrastructure.

**Addressing Scope 3 Emissions (Value chain emissions):** Engage with suppliers and customers to reduce emissions throughout the supply chain, such as sourcing from

<sup>48</sup> <https://www.fsb-tcf.d.org/recommendations/>

<sup>49</sup> <https://sciencebasedtargets.org/> and <https://sciencebasedtargets.org/net-zero>

suppliers that have taken steps to reduce their own CO2 emissions, and making informed transportation decisions.

**Investment in carbon offsetting:** To compensate for unavoidable emissions, invest in verified high-quality carbon offset projects, such as reforestation or clean energy projects. However, offsetting should only be considered when all other avenues for potential emissions reduction have been explored.

**Regular reporting and transparency:** Regularly monitor, report, and communicate progress in reducing emissions and energy consumption. Adhere to international reporting frameworks, utilising established estimation methodologies and structured disclosures for transparency and accountability. (See below).

**Employee engagement and training:** Foster a culture of sustainability within the organisation by educating employees on climate issues.

**Hybrid working for employees:** Offering employees the opportunity to work remotely will help to reduce CO2 emissions associated with travel to and from the workplace.

**Use of recycled precious metals:** Using recycled precious metals generates an overall smaller negative environmental footprint and results in lower CO2 emissions compared to metals produced from primary mined ores and concentrates.

**Innovation and sustainable product design:** Invest in research and development for sustainable products, focusing on reducing CO2 emissions across the product lifecycle.

### 8.1.2. Alignment with the SDGs



Goal	Description
7 - Affordable and Clean Energy	Ensure access to affordable, reliable, sustainable and modern energy
12 - Responsible Consumption and Production	Ensure sustainable consumption and production patterns
13 - Climate Action	Take urgent action to combat climate change and its impacts



In reality, the majority of the 17 SDGs either directly include action on climate change or they are impacted by it in some way. However, the key SDGs most applicable to the themes of Climate and Energy are outlined below.

**SDG 7** emphasises the need to ensure access to affordable, reliable, sustainable, and modern energy for all. It underscores the importance of improving energy efficiency and increasing the use of renewable energy sources, aligning directly with the objectives of reducing energy consumption and transitioning to cleaner energy forms in business operations.

**SDG 12** focuses on promoting sustainable consumption and production patterns. This includes the efficient use of natural resources, reduction of waste through recycling and reuse, and reducing the carbon footprint of production and consumption activities.

**SDG 13** is dedicated to taking urgent action to combat climate change and its impacts. It aligns with corporate strategies aimed at reducing carbon emissions, implementing climate change mitigation strategies, and enhancing resilience and adaptive capacity to climate-induced impacts.

### 8.1.3. Applicable Frameworks, Initiatives and Regulations

The following non-exhaustive list of international frameworks, initiatives and regulations are applicable to the topic of Climate and Energy.

#### Global Frameworks and Initiatives:

- **The Paris Agreement:** A legally binding international treaty on climate change adopted by 196 countries (at the UN Climate Change Conference in Paris, France) in 2015. It entered into force in 2016 under the United Nations Framework Convention on Climate Change (UNFCCC), with the aim of limiting global warming and strengthening countries' ability to deal with climate impacts. It is significant in this context as its overarching goals (to hold "the increase in the global average temperature to well below 2°C above pre-industrial levels" and pursue efforts "to limit the temperature increase to 1.5°C above pre-industrial levels") form the basis on which emissions reduction targets are set. (See also the reference, below, to the *Science Based Targets initiative/SBTi*.)
- **The Greenhouse Gas Protocol (GHG Protocol):** Offers a comprehensive global standardised framework for the measurement and management of greenhouse gas (GHG) emissions from private and public sector operations, value chains, and

mitigation actions. Its *Corporate Accounting and Reporting Standard* is the primary reference directing organisations how to quantify their 'carbon footprint'<sup>50</sup>.

- **The Taskforce on Climate-Related Financial Disclosures (TCFD)** developed recommendations on the types of information that companies should disclose to support investors, lenders, and other stakeholders in appropriately assessing a defined set of risks related to climate change. It rapidly became the overarching framework shaping corporate climate-related reporting and its recommendations were soon embedded in regulations and policy guidance emerging across the world. Once these recommendations had gained traction the ongoing development of the guidance became less urgent and, in 2023, the IFRS Foundation<sup>51</sup> took over the monitoring the progress of companies' climate-related disclosures, aligned to the TCFD recommendations.
- **The International Sustainability Standards Board (ISSB)** was created to consolidate and build on the work of several market-led reporting initiatives centred on climate-focused reporting—comprising the Climate Disclosure Standards Board (CDSB), the Task Force for Climate-related Financial Disclosures (TCFD), the Value Reporting Foundation's Integrated Reporting Framework and the Sustainability Accounting Standards Board (SASB). Its recently launched standards, IFRS S1 (General Requirements for Disclosure of Sustainability-related Financial Information) and S2 (Climate-related Disclosures)<sup>52</sup>, are expected to become globally accepted sustainability reporting standards, with the latter integrating and closely reflective of the TCFD recommendations.
- **The European Green Deal:** A set of policy initiatives with the overarching aim of making Europe climate neutral by 2050<sup>53</sup>.
- **The Science Based Targets initiative (SBTi):** Guides companies in setting science-based GHG emissions reduction targets. More specifically, it is the primary route through which companies can publicly register their emissions reduction commitments and have their reduction targets validated. Its *Corporate Net-Zero Standard* is a key guidance document to direct companies on how to set targets in line with Net Zero 2050 goals<sup>54</sup>.
- **UN Global Compact:** A voluntary initiative based on CEO commitments on the principles of human rights, labour and the environment.
- **OECD Handbook on Environmental Due Diligence in Mineral Supply Chains:** This handbook demonstrates how OECD instruments on due diligence can be applied to address environmental risks and impacts in mineral supply chains by

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<sup>50</sup> <https://ghgprotocol.org/corporate-standard>

<sup>51</sup> <https://www.ifrs.org/>

<sup>52</sup> <https://www.ifrs.org/sustainability/knowledge-hub/introduction-to-issb-and-ifrs-sustainability-disclosure-standards/>

<sup>53</sup> [https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal\\_en](https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal_en)

<sup>54</sup> <https://sciencebasedtargets.org/net-zero>

contextualising existing recommendations and directing users towards useful resources<sup>55</sup>.

- **Carbon Disclosure Project (CDP):** an international non-profit organisation based in the United Kingdom, Japan, India, China, Germany, Brazil and the United States that offers a platform for (and direction on) how companies, cities, states, regions and public authorities disclose their environmental impact<sup>56</sup>.

### **Current and Emerging Regulation:**

- **US SEC Climate Disclosure Rule (proposed):** The proposed rules will require public companies to disclose climate-related information, such as Scope 1, 2, and 3 emissions, climate-related risks and opportunities, and governance practices<sup>57</sup>.
- **French Corporate Duty of Vigilance Law (2017):** requires large companies in France to manage their human rights and environmental risks effectively – both within the company itself and also its subsidiaries, subcontractors and suppliers.
- **EU Corporate Sustainability Reporting Directive (CSRD) (2024):** requires large companies to publish regular reports on the social and environmental risks they face and on how their activities impact people and the environment (including impacts to climate)<sup>58</sup>.
- **EU Directive on Corporate Sustainability Due Diligence (CSDD) (Proposed):** will require large companies to conduct due diligence to identify, prevent, or mitigate adverse impacts on the environment and human rights<sup>59</sup>.
- **The UK Climate-related Financial Disclosure Regulations (CFDR) (2022):** requires large companies to disclose climate-related financial information.

## **8.2. Waste, Water and Circularity**

The effective management of waste generated by business operations is a critical aspect of sustainable practices. Effective waste management encompasses a holistic approach: from reducing waste production at the source to promoting recycling and reuse, and ensuring responsible disposal methods. It is not just about mitigating the negative impacts of waste on the environment; it's also about rethinking and redesigning operational processes to prevent waste generation in the first place. This approach is in line with the principles of the circular economy, which aims to keep resources in use for as long as

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<sup>55</sup> <https://www.oecd.org/publications/handbook-on-environmental-due-diligence-in-mineral-supply-chains-cef843bf-en.htm>

<sup>56</sup> <https://www.cdp.net/en>

<sup>57</sup> <https://www.sec.gov/files/rules/proposed/2022/33-11042.pdf>

<sup>58</sup> [https://finance.ec.europa.eu/regulation-and-supervision/financial-services-legislation/implementing-and-delegated-acts/corporate-sustainability-reporting-directive\\_en](https://finance.ec.europa.eu/regulation-and-supervision/financial-services-legislation/implementing-and-delegated-acts/corporate-sustainability-reporting-directive_en)

<sup>59</sup> [https://commission.europa.eu/business-economy-euro/doing-business-eu/corporate-sustainability-due-diligence\\_en](https://commission.europa.eu/business-economy-euro/doing-business-eu/corporate-sustainability-due-diligence_en)

possible, extract the maximum value from them while in use, and recover and regenerate products and materials at the end of their service life<sup>60</sup>.

The focus on waste reduction, recycling, and reuse is not only an environmental necessity but also a business imperative. Effective waste management practices can lead to significant cost savings, improve operational efficiency, and enhance corporate reputation. Moreover, as consumer awareness and regulatory pressures increase, businesses that proactively address waste management are better positioned to meet these evolving expectations and standards.

This section will explore the different dimensions of waste management, offering insights into best practices and innovative approaches. The goal is to provide an understanding of how businesses can effectively manage waste, contribute to environmental sustainability, and derive economic benefits from these practices. The adoption of sustainable waste management strategies is a key step towards building a more sustainable future and aligning business operations with global environmental goals.

In addition to waste management and circularity, another critical aspect for the jewellery sector is the efficient use of water in production processes. Water plays a significant role in various stages of jewellery manufacturing, from mineral processing to the final product finishing. However, inefficient use and management of water can lead to significant wastage and environmental impact, particularly in areas facing water scarcity.

It is essential for jewellery businesses to implement measures that minimise water wastage. This includes adopting water-efficient technologies, recycling and reusing water in production processes, and ensuring that any wastewater discharge meets environmental standards to prevent pollution. Beyond the operational benefits, such as cost savings and compliance with regulations, efficient water management also aligns with the broader global goals of sustainable resource use and environmental protection.

### 8.2.1. Best Practice Recommendations

#### **Best Practice: Waste, Water and Circularity**

**Waste reduction strategies:** Implement processes to minimise waste generation in every stage of jewellery production.

**Recycling and reuse:** Establish systems for recycling scrap materials and implement processes to recycle returned or defective products.

<sup>60</sup> *The Circular Economy in Detail*, Ellen Macarthur Foundation; <https://www.ellenmacarthurfoundation.org/the-circular-economy-in-detail-deep-dive>

**Circular business models:** Adopt circular business models, such as offering jewellery repair services, refurbishing old pieces, or creating new pieces from recycled materials. Implement take-back or buy-back programs for end-of-life products to encourage recycling.

**Efficient water usage:** Invest in water-efficient technologies for jewellery processing and implement water recycling systems in production to reduce freshwater usage and wastewater generation.

**Responsible packaging:** Use recyclable or biodegradable materials for packaging. Minimise packaging size and complexity to reduce waste.

**Lifecycle analysis:** Conduct lifecycle analysis of products and materials to understand their environmental impact from production to disposal, with a focus on identifying and mitigating the generation of waste. Use insights from lifecycle analysis to make more sustainable choices in material selection and product design.

**Responsible sourcing:** Source materials from suppliers that practice responsible waste and water management.

**Employee training and engagement:** Educate employees about sustainable practices in waste, water, and circularity.

**Sustainable materials:** Consider using recycled precious metals to minimise the negative environmental impacts from mining, including waste generation. When sourcing mined materials, set standards for your supply chain to ensure that raw materials originate from responsibly managed sources. This will typically involve verifying the industry standards your suppliers evidently adhere to.

### 8.2.2. Alignment with the SDGs



Goal	Description
6 - Clean Water and Sanitation	Ensure access to water and sanitation for all
11 - Sustainable Cities and Communities	Make cities inclusive, safe, resilient and

	sustainable
<b>12 - Responsible Consumption and Production</b>	Ensure sustainable consumption and production patterns
<b>14 - Life Below Water</b>	Conserve and sustainably use the oceans, seas and marine resources
<b>15- Life On Land</b>	Sustainably manage forests, combat desertification, halt and reverse land degradation, halt biodiversity loss

**SDG 6** emphasises the importance of ensuring availability and sustainable management of water and sanitation for all. It highlights the need for efficient water usage, wastewater treatment, and water conservation practices, directly relating to responsible water management in business operations.

**SDG 11** includes considerations for reducing the environmental impact of urban areas, which can be partly achieved through efficient waste management and circular practices.

**SDG 12** is central to the concepts of waste management and circularity and aims to ensure sustainable consumption and production patterns. It advocates for reducing waste generation through prevention, reduction, recycling, and reuse. It also encompasses the adoption of sustainable practices across the lifecycle of products, which is integral to circular business models.

**SDG 14 and SDG 15** emphasise the need to conserve and sustainably use the oceans, seas, and marine resources, and protect, restore, and promote sustainable use of terrestrial ecosystems. Efficient waste and water management practices play a crucial role in preventing pollution and preserving both aquatic and terrestrial environments.

**8.2.3. Applicable Frameworks, Initiatives and Regulations**

The following non-exhaustive list of international frameworks, initiatives and regulations are applicable to the topic of Waste, Water and Circularity.

**Global Frameworks and Initiatives:**

- **The Ellen MacArthur Foundation's Circular Economy Principles:** Offers guidelines and resources for businesses transitioning to circular economy models.

- **Zero Waste International Alliance (ZWIA):** Provides standards and guidelines for achieving zero waste, including principles of waste prevention, reuse, and recycling<sup>61</sup>.
- **EU Circular Economy Action Plan (2020):** One of the ‘building blocks’ of the European Green Deal<sup>62</sup>, the plan seeks to promote circular economy practices, including EPR schemes and targets for recycling<sup>63</sup>.
- **OECD Handbook on Environmental Due Diligence in Mineral Supply Chains:** This handbook demonstrates how OECD instruments on due diligence can be applied to address environmental risks and impacts in mineral supply chains by contextualising existing recommendations and directing users towards useful resources.

### Current and Emerging Regulation:

- **EU Waste Framework Directive (2008):** Sets the legislative framework for the handling of waste in the European Union. It includes key concepts like waste hierarchy, extended producer responsibility, and the target to recycle 65% of municipal waste by 2035.
- **California's Recycling and Waste Reduction Laws:** Require producers to be responsible for the end-of-life management of their products.
- **EU Directive on Packaging and Packaging Waste (1994):** Sets recycling and recovery targets for packaging waste and establishes essential requirements for the composition and the reusable and recoverable nature of packaging.
- **EU Sustainable Products Initiative (2022):** Aims to ensure that products placed on the EU market become more sustainable. It does not currently apply directly to Jewellery but the scope of the initiative is likely to expand overtime to cover additional consumer product categories.
- **The Ecodesign for Sustainable Products Regulation (proposed):** It aims to establish sustainability principles and requirements for products placed on the EU market, focusing on reducing environmental and climate impacts throughout their lifecycle<sup>64</sup>. As above, this may not initially apply to the jewellery sector but the scope may be expanded to include it.
- **French Corporate Duty of Vigilance Law (2017):** requires large companies in France to manage their human rights and environmental risks effectively – both within the company itself and also its subsidiaries, subcontractors and suppliers.
- **EU Corporate Sustainability Reporting Directive (CSRD) (2024):** requires large companies to publish regular reports on the social and environmental risks they face and on how their activities impact people and the environment.

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<sup>61</sup> <https://zwia.org/>

<sup>62</sup> [https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal\\_en](https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal_en)

<sup>63</sup> [https://environment.ec.europa.eu/strategy/circular-economy-action-plan\\_en](https://environment.ec.europa.eu/strategy/circular-economy-action-plan_en)

<sup>64</sup> [https://environment.ec.europa.eu/publications/proposal-ecodesign-sustainable-products-regulation\\_en](https://environment.ec.europa.eu/publications/proposal-ecodesign-sustainable-products-regulation_en)

- **EU Directive on Corporate Sustainability Due Diligence (CSDD) (Proposed):** will require large companies to conduct due diligence to identify, prevent, or mitigate adverse impacts on the environment and human rights.

### 8.3. Nature and Biodiversity

Nature and biodiversity are fundamental components of the world's ecosystems and hold immense value not only ecologically but also economically, socially, and culturally. Nature refers to the physical world collectively, including plants, animals, landscapes, and other features and products of the earth - often held as distinct from humans or human creations. Biodiversity, on the other hand, describes the variety of life in all its forms and levels, including the diversity of species, ecosystems, and genetic variation within species<sup>65</sup>. That said, these distinctions can also be challenged as implying a false dichotomy, and a strong case can also be made for adopting an inclusive approach rather than assuming some form of hierarchy of priorities<sup>66</sup>.

Preserving nature and biodiversity is crucial because these elements underpin ecosystem services that are essential for human survival and well-being<sup>67</sup>, such as food provision, water purification, disease control, and climate regulation. They are also vital for the resilience of ecosystems, helping them adapt to changes and stresses, including those caused by climate change. For businesses, preserving biodiversity is not just a matter of environmental stewardship but a strategic imperative. The degradation of nature and biodiversity poses significant risks including the disruption of supply chains, loss of raw materials, increased regulatory pressures, and diminished resilience to climate impacts<sup>68</sup>.

Business activities and economic growth have been significant drivers of nature and biodiversity loss. The extraction of resources, land conversion, pollution, and the introduction of invasive species have accelerated the degradation of ecosystems and the extinction of species. The costs associated with the loss of biodiversity will be enormous, affecting not only the environment but also economies and societies at large. The global economy is now already operating outside the safe zones for six of the nine planetary boundaries<sup>69</sup> – processes that are critical for maintaining the Earth's stability.

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<sup>65</sup> *Biodiversity and Nature: close but not quite the same* (2022), Convention on Biological Diversity; <https://www.cbd.int/idb/activities/difference-biodiversity-nature.pdf>

<sup>66</sup> See, for example, *Governing Biodiversity and Nature: A False Distinction* (2023), *Frontiers of Socio-Legal Studies*; <https://frontiers.csls.ox.ac.uk/governing-biodiversity-and-nature/>

<sup>67</sup> See, for example, *Exploring connections among nature, biodiversity, ecosystem services, and human health and well-being: Opportunities to enhance health and biodiversity conservation* (2015), *Ecosystem Services*, Vol. 12; <https://www.sciencedirect.com/science/article/pii/S2212041614001648>

<sup>68</sup> *Biodiversity's Bottom Line: A New Imperative for Businesses* (2023), Earth.org. <https://earth.org/biodiversitys-bottom-line-a-new-imperative-for-businesses/>

<sup>69</sup> *Humans Have Crossed 6 of 9 'Planetary Boundaries'* (2023), *Scientific American*; <https://www.scientificamerican.com/article/humans-have-crossed-6-of-9-planetary-boundaries/>



The intersection of climate change and biodiversity loss is particularly critical<sup>70</sup>. The two are deeply interconnected, with climate change exacerbating biodiversity loss, and the loss of biodiversity weakening nature's ability to buffer against climate extremes<sup>71</sup>. This cycle highlights the need for integrated approaches to address both climate change and biodiversity preservation together.

Policy and regulation aimed at halting biodiversity loss are advancing rapidly. International agreements like the Convention on Biological Diversity (CBD)<sup>72</sup>, and various regional and national legislations have been strengthened and expanded in recent years. Most significantly, in December 2022, The Kunming-Montreal Global Biodiversity Framework (GBF) was adopted, which aims to halt and reverse biodiversity loss by 2030<sup>73</sup>. It features 23 targets to be met by 2030 and four longer-term global goals to both preserve biodiversity for current and future generations and support the achievement of the Sustainable Development Goals (SDGs).

The speed at which the Taskforce for Nature-related Financial Disclosures (TNFD) has gained traction, mirroring the success of TCFD (and deliberately borrowing from the focus and form of its recommendations), suggests expectations and requirements for nature-focused company reporting will continue to expand and accelerate.

As with climate change, businesses must therefore acknowledge and adapt to these changes, recognising the growing expectation for corporate responsibility in preserving biodiversity.

As policies and regulations evolve to address this crisis, businesses have the opportunity, and responsibility, to be at the forefront of these efforts, contributing to a sustainable future for both the planet and the economy.

### 8.3.1. Best Practice Recommendations

#### **Best Practice: Nature and Biodiversity**

**Assessing biodiversity impact:** Subject to your position in the supply chain, conduct regular assessments to understand the business's impact on biodiversity. Use tools like biodiversity footprint analysis to measure and monitor impacts on ecosystems and

<sup>70</sup> See, for example, *Why efforts to address climate change through nature-based solutions must support both biodiversity and people* (2021), The Royal Society; <https://royalsociety.org/topics-policy/projects/biodiversity/nature-based-solutions/>

<sup>71</sup> *Tackling Biodiversity & Climate Crises Together and Their Combined Social Impacts* (2021), United Nations; <https://www.un.org/sustainabledevelopment/blog/2021/06/tackling-biodiversity-climate-crises-together-and-their-combined-social-impacts/>

<sup>72</sup> <https://www.cbd.int/>

<sup>73</sup> <https://www.cbd.int/gbf/>

species. This also includes looking beyond your immediate operations to actual and potential biodiversity impacts along the supply chain. Pay particular attention to the location and impacts of upstream mineral extraction to ensure that mining operations are responsibly managed and do not adversely impact nature and biodiversity.

**Use recycled and/or laboratory grown materials:** For the jewellery industry, the largest impacts to nature and biodiversity typically occur at the point of mineral extraction. While the use of recycled and laboratory grown jewellery materials do not result in zero harm to nature and biodiversity, the negative impacts are likely to be significantly reduced.

**Integrating biodiversity into corporate strategy:** Embed biodiversity considerations into business strategies and decision-making processes. This includes setting specific biodiversity goals and incorporating them into overall corporate sustainability objectives.

**Habitat preservation and restoration activities:** Engage in activities that preserve, restore, and enhance natural habitats and ecosystems, especially those that are critical for biodiversity. This can be achieved through conservation projects or partnerships with environmental organisations, for example.

**Community engagement and collaboration:** Collaborate with local communities, governments, NGOs, and other businesses to support biodiversity initiatives. Participate in or support community-led conservation and restoration projects.

**Green infrastructure development:** Incorporate green infrastructure, such as green roofs, walls, and landscaping, into business facilities. These can provide habitat for wildlife and contribute to local biodiversity.

**Supply chain collaboration for biodiversity:** Work collaboratively with suppliers to develop and implement biodiversity-friendly practices across the supply chain, and encourage suppliers to adopt similar commitments.

**Monitoring and reporting on biodiversity performance:** Regularly monitor and publicly report on progress against biodiversity targets to maintain transparency and stakeholder engagement.

### 8.3.2. Alignment with the SDGs



Goal	Description
2- Zero Hunger	Creating a world free of hunger
3 - Good Health and Well-being	Ensure healthy lives and promote well-being for all at all ages
6 - Clean Water and Sanitation	Ensure access to water and sanitation for all.
12 - Responsible Consumption and Production	Ensure sustainable consumption and production patterns
13 - Climate Action	Take urgent action to combat climate change and its impacts
14 - Life Below Water	Conserve and sustainably use the oceans, seas and marine resources
15- Life On Land	Sustainably manage forests, combat desertification, halt and reverse land degradation, halt biodiversity loss

**SDG 2** and **SDG 3**, although primarily focused on human needs, intersect with nature and biodiversity, as sustainable agricultural practices and preserving natural habitats contribute to food security and human health.

**SDG 6** also has implications for ecosystems. Maintaining clean and sustainable water sources is essential for the health of aquatic ecosystems and the species that depend on them.

**SDG 12** promotes sustainable consumption and production patterns. This includes implementing sustainable practices in industries, reducing waste, and promoting resource and energy efficiency, all of which have a direct impact on biodiversity and natural ecosystems.

**SDG 13** addresses the need to take urgent action to combat climate change and its impacts. The health of natural ecosystems is intrinsically linked to climate change, with biodiversity playing a critical role in climate regulation and resilience.

**SDG 14** focuses on conserving and sustainably using the oceans, seas, and marine resources. This goal addresses the critical need to protect aquatic ecosystems, which are vital for biodiversity, climate regulation, and sustaining livelihoods.

**SDG 15** aims at protecting, restoring, and promoting sustainable use of terrestrial ecosystems, managing forests sustainably, combating desertification, halting and reversing land degradation, and halting biodiversity loss. This goal underscores the importance of conserving natural habitats and species on land.

### 8.3.3. Applicable Frameworks, Initiatives and Regulations

The following non-exhaustive list of international frameworks, initiatives and regulations are applicable to the topic of Nature and Biodiversity.

#### Global Frameworks and Initiatives:

- **Convention on Biological Diversity (CBD):** An international agreement aimed at conserving biological diversity, sustainable use of its components, and fair and equitable sharing of benefits arising from genetic resources<sup>74</sup>.
- **The Global Biodiversity Framework:** A historic framework consisting of 23 global targets to be achieved by 2030, and four goals for 2050, to safeguard biodiversity and sustainably use eco-system services<sup>75</sup>.
- **EU Biodiversity Strategy for 2030:** A key component of the European Green Deal, it aims to protect nature and reverse the degradation of ecosystems<sup>76</sup>.
- **Science Based Targets Network (SBTN):** Building on the success of the SBTi, this additional initiative provides guidance for companies to set science-based targets for nature (*and climate*)<sup>77</sup>.
- **Taskforce on Nature-related Financial Disclosures (TNFD):** Aims to guide organisations and companies on how they report and act on evolving nature-related dependencies, impacts, risks and opportunities<sup>78</sup>. It seeks to support business decisions which, ultimately, will facilitate a shift from nature-negative outcomes and toward nature-positive ones.
- **The Nature Positive Initiative:** represents conservation organisations, institutes, and business and finance coalitions coming together to drive alignment around use of the term 'nature positive' and support broader, longer-term efforts to deliver nature-positive outcomes<sup>79</sup>.
- **Business for Nature:** A global coalition of more than 85 influential partner organisations and progressive companies. The goal of the coalition is to drive

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<sup>74</sup> <https://www.cbd.int>

<sup>75</sup> <https://www.cbd.int/gbf/>

<sup>76</sup> [https://environment.ec.europa.eu/strategy/biodiversity-strategy-2030\\_en](https://environment.ec.europa.eu/strategy/biodiversity-strategy-2030_en)

<sup>77</sup> <https://sciencebasedtargets.org/about-us/sbtn>

<sup>78</sup> <https://tnfd.global/>

<sup>79</sup> <https://www.naturepositive.org/>

business action and policy ambition to achieve a nature-positive economy for all by 2030<sup>80</sup>.

- **OECD Handbook on Environmental Due Diligence in Mineral Supply Chains:** This handbook demonstrates how OECD instruments on due diligence can be applied to address environmental risks and impacts in mineral supply chains by contextualising existing recommendations and directing users towards useful resources.

### **Current and Emerging Regulation:**

- **EU Taxonomy Regulation (2020):** Provides a classification system to determine environmentally sustainable economic activities, including criteria related to biodiversity and ecosystem protection<sup>81</sup>.
- **Corporate Sustainability Reporting Directive (CSRD) (2024):** Will expand the scope of the existing Non-Financial Reporting Directive (NFRD), mandating more detailed reporting on sustainability matters, including impacts on biodiversity.
- **EU Nature Restoration Law (proposed):** A key element of the EU's Biodiversity Strategy<sup>82</sup>, the proposed law calls for binding targets to restore degraded ecosystems, with emphasis placed on potential carbon sinks and nature-based resilience solutions to reduce the impact of natural disasters<sup>83</sup>.
- **EU Deforestation Regulation (2023):** Aims to minimise the risk of deforestation and forest degradation associated with products placed on the EU market<sup>84</sup>.
- **French Corporate Duty of Vigilance Law (2017):** Requires large companies in France to manage their human rights and environmental risks effectively – both within the company itself and also its subsidiaries, subcontractors and suppliers.
- **EU Directive on Corporate Sustainability Due Diligence (CSDD) (Proposed):** will require large companies to conduct due diligence to identify, prevent, or mitigate adverse impacts on the environment and human rights.

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<sup>80</sup> <https://www.businessfornature.org/>

<sup>81</sup> [https://finance.ec.europa.eu/sustainable-finance/tools-and-standards/eu-taxonomy-sustainable-activities\\_en](https://finance.ec.europa.eu/sustainable-finance/tools-and-standards/eu-taxonomy-sustainable-activities_en)

<sup>82</sup> [https://environment.ec.europa.eu/strategy/biodiversity-strategy-2030\\_en](https://environment.ec.europa.eu/strategy/biodiversity-strategy-2030_en)

<sup>83</sup> [https://environment.ec.europa.eu/topics/nature-and-biodiversity/nature-restoration-law\\_en](https://environment.ec.europa.eu/topics/nature-and-biodiversity/nature-restoration-law_en)

<sup>84</sup> [https://environment.ec.europa.eu/news/green-deal-new-law-fight-global-deforestation-and-forest-degradation-driven-eu-production-and-2023-06-29\\_en](https://environment.ec.europa.eu/news/green-deal-new-law-fight-global-deforestation-and-forest-degradation-driven-eu-production-and-2023-06-29_en)

## 9. Product

### 9.1. Traceability and Chain of Custody

Traceability refers to the ability to identify and trace the journey of raw materials, inputs and products through every stage of the supply chain, from origin to final product. It is important because it forms the basis for understanding and managing the social and environmental impacts associated with products.

Without some form of systematic approach to traceability, identifying the potential status and significance of specific social and environmental issues along a supply chain becomes challenging, if not impossible. It therefore underpins the foundations of a credible responsible sourcing policy, which was referred to above as a prerequisite to any further industry progress on wider sustainability objectives. (See section 3, *Building on Responsible Sourcing good practice*, above, and *Appendix I - CIBJO Responsible Sourcing Policy & Guidance*, below.)

Furthermore, the jewellery sector is experiencing increasing pressure from consumers, investors, and regulatory bodies to provide transparency about the origins and production conditions of their products. Consumers are growing more conscious of the ethical implications of their purchases, driving demand for assurances that jewellery is not only of high quality but also ethically and sustainably sourced. Traceability is key to achieve this.

The rise of supply chain due diligence regulations across various global markets has also made traceability a business necessity for many companies. Laws and directives are increasingly requiring companies to demonstrate transparency in their supply chains and to ensure their products do not contribute to social and environmental harm. This regulatory landscape underscores the need for robust traceability systems that can provide clear and verifiable chain of custody information. Traceability is, of course, not an end in itself. Systems and processes for traceability should be considered as due diligence tools, enabling businesses to identify and then mitigate identified risks in their supply chains<sup>85</sup>.

In the context of the jewellery industry, and particularly in the sourcing of colored gemstones, traceability faces specific hurdles. The supply chain for coloured gemstones is often marked by informality, with many transactions occurring outside of formal channels and lacking systematic chain of custody documentation. This informality poses significant challenges in identifying the origin of gemstones and ensuring that they are sourced in a manner that respects human rights and environmental standards. Up to a fifth of annual gold production is also produced via artisanal or small-scale miners that very frequently

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<sup>85</sup> *Rethinking Traceability as a Common Good* (2023), Levin Sources; <https://www.levinsources.com/knowledge-centre/insights/traceability-common-good>

operate in an informal (and sometimes illegal) manner. This also makes the material they produce very difficult to validate in terms of its responsible production or sustainability credentials. Although this gold still exists largely outside of formal supply chains it is likely that enters the mainstream market eventually – often via markets that lack chain of custody management systems or are less observant of responsible sourcing due diligence procedures.

Precious metals may also be problematic to trace over time due to the intermingling of sources as part of the refining (or re-refining) process. Gold’s virtual indestructibility means it is endlessly recyclable and this can pose a challenge to tracing systems which expect distinct, segregated, or uniquely identifiable inputs.

In practice, most traceability processes are based around keeping a clear record of the chain of custody as materials and products pass along the value chain. For jewellery, this means a sequence of documented steps tracking the path of materials from sourcing, utilisation and fabrication, through to product distribution and even consumer purchase. But the inherent circularity of some markets and materials (particularly gold, but also repurposed gemstones) means full traceability may not be practical. This places particular significance on the degree of credibility and transparency offered by the chain of custody process and the data or documentary evidence it provides regarding the sequence of entities that have custody of materials (metals and gemstones) as they move through a supply chain from origin to consumer. (See, for example, the RJC’s Chain of Custody standard and guidance<sup>86</sup>.)

In summary, raw material and product traceability, through a documented chain of custody, is essential for addressing the complex challenges of sustainability in the jewellery sector. It is a key enabler for ensuring compliance with emerging regulations, meeting consumer expectations for ethical products, and ultimately, for driving the industry towards more responsible and sustainable practices. However, achieving effective traceability, especially in certain areas of the jewellery supply chain, remains a challenge, requiring innovative solutions, collaboration across the industry, and a commitment to transparency and continuous improvement.

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<sup>86</sup> <https://www.responsiblejewellery.com/standards/chain-of-custody-2017/>

### 9.1.1. Best Practice Recommendations

#### **Best Practice: Traceability**

**Supply chain mapping:** Traceability is about gathering information and data about the origin and movements of materials and products in the supply chain. In order to understand what data and information you need to collect, you will first need to map your supply chain at the material level.

**Supplier engagement and transparency:** Collaborate closely with suppliers to establish and maintain traceability. Encourage transparency in their operations and require them to provide detailed information on the origin of materials.

**Know Your Customer/Counterparty (KYC) principles:** Companies should apply KYC to their supply chains, which require businesses to establish, wherever possible, the identity of all organisations 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.

**Chain of custody certification:** Pursue certifications like the Responsible Jewellery Council (RJC) Chain-of-Custody Standard Certification, which verifies that precious metals have originated from responsible producers or refiners.

**Documentation and record keeping:** Maintain detailed records at each stage of the supply chain. Ensure accurate documentation of transactions, certifications, and origin of materials.

**Targets and goals:** 100% traceability will take time to achieve and, depending on your definitions, may simply be impossible for all materials even in the long term. Set realistic targets and goals for improving traceability over time. For example, if you are sourcing polished diamonds from a jewellery manufacturer, the first step could be to trace all polished diamonds to the diamond cutter and polisher. You can then develop strategies to identify other upstream actors and locations, including the countries and mines of origin for rough diamonds.

**Training and capacity building:** Communicate with all stakeholders, including suppliers and customers, about the importance of traceability and the steps being taken to ensure it in your products and along the supply chain.

**Collaboration with industry groups:** Participate in industry groups and initiatives that aim to improve traceability in the jewellery sector.

**Product communications and storytelling:** Use traceability information to tell the story of your products, highlighting ethical sourcing and production processes to build consumer trust and brand loyalty, but remaining mindful to stick to 'credible claims'



### 9.1.2. Alignment with the SDGs



Goal	Description
<b>12 - Responsible Production and Consumption</b>	Ensure sustainable consumption and production patterns
<b>16 - Peace, Justice and Strong Institutions</b>	Promote just, peaceful and inclusive societies

**SDG 12** advocates for sustainable consumption and production patterns. It emphasises the need for transparency in supply chains and encourages companies to adopt sustainable practices. Traceability systems are essential to ensure that materials are sourced responsibly and that products are produced sustainably.

**SDG 16** focuses on promoting peaceful and inclusive societies, providing access to justice for all, and building effective, accountable institutions. Traceability contributes to this goal by promoting transparency and accountability in business practices, helping to combat corruption and illicit trade, particularly in conflict-affected areas.

### 9.1.3. Applicable Frameworks, Initiatives and Regulations:

The following non-exhaustive list of international frameworks, initiatives and regulations are applicable to the topic of Traceability.

#### Global Frameworks and Initiatives:

- **Colored Gemstone Working Group (CGWG):** An initiative by leading luxury brands to improve traceability and responsible sourcing in the colored gemstone industry<sup>87</sup>. It focuses on enhancing transparency and ethical practices in the supply chain of colored gemstones.
- **Responsible Jewellery Council (RJC) Code of Practice (CoP) and Chain of Custody Standard:** Provides a framework for companies in the jewellery supply chain to source traceable precious metals from responsibly managed sources.

<sup>87</sup> <https://www.gemstones-and-jewellery.com/>

- **Diamond Development Initiative (DDI)**<sup>88</sup>: A Nigerian not-for-profit organization that seeks to complements the role of other stakeholder groups (development agencies, donors, and funding organisations) by providing technical assistance to improve the social and economic conditions of artisanal diamond miners. The initiative focuses on the traceability of responsibly produced diamonds.
- **Kimberley Process Certification Scheme (KPCS)**: An international certification scheme that prevents conflict diamonds from entering the mainstream rough diamond market<sup>89</sup>. It ensures that diamond purchases are not financing violence by rebel movements.
- **World Diamond Council’s Warranties Scheme**: The scheme supports compliance with the Kimberley Process Certification Scheme (KPCS) by requiring professional buyers and sellers of rough diamonds, polished diamonds and diamond-set jewellery to include a warranty statement as a record of each transaction<sup>90</sup>.
- **OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas**: Provides guidelines for companies to ensure responsible supply chains of minerals, particularly from conflict-affected and high-risk areas, emphasising traceability and supply chain due diligence.
- **LBMA’s Responsible Gold Guidance (RGG)**: Defines the criteria by which gold is refined and brought to market in a responsible manner<sup>91</sup>.
- **World Gold Council’s Responsible Gold Mining Principles (RGMPs)**: Defines how the large-scale gold producers meet defined ESG criteria, offering a detailed range of indicators they must perform against to ensure the gold they mine is responsibly and sustainably produced<sup>92</sup>.
- **Responsible Minerals Initiative (RMI)**: Offers resources and tools for downstream companies to make informed choices about mineral sourcing<sup>93</sup>.
- **Fairtrade Gold**: An independent certification system for gold produced from Artisanal or Small-scale Gold Mines (ASGM)<sup>94</sup>. All Fairtrade Gold comes from mines which meet the Fairtrade Gold Standard.
- **Fairmined Gold**: Similar to Fairtrade Gold, all Fairmined Gold comes from ASGM producers that adhere to well-defined social and environmental standards<sup>95</sup>.

### Current and Emerging Regulation:

- **EU Conflict Minerals Regulation (2021)**: Requires due diligence on supply chains for EU importers of Tin, Tantalum, Tungsten and Gold. The regulation is aligned with

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<sup>88</sup> <https://www.ddinigeria.org/>

<sup>89</sup> <https://www.kimberleyprocess.com/>

<sup>90</sup> <https://www.worlddiamondcouncil.org/about-sow/>

<sup>91</sup> <https://www.lbma.org.uk/publications/responsible-gold-guidance-v9>

<sup>92</sup> <https://www.gold.org/industry-standards/responsible-gold-mining>

<sup>93</sup> <https://www.responsiblemineralsinitiative.org/>

<sup>94</sup> <https://www.fairtrade.net/standard/gold>

<sup>95</sup> <https://fairmined.org/>

the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas 5-Step Framework.

- **UK Modern Slavery Act (2015) and Australia’s Modern Slavery Act (2018):** mandates annual disclosures on efforts to address modern slavery in business operations and supply chains for in-scope companies.
- **California Transparency in Supply Chains Act (2010):** requires disclosure from in-scope businesses about efforts to eliminate slavery and human trafficking from direct supply chains.
- **German Supply Chain Due Diligence Act (2023):** imposes obligations on large companies based in Germany with regard to human rights due diligence along the supply chain.
- **Norwegian Transparency Act (2022):** requires certain companies in Norway to carry out due diligence activities to ensure they operate responsibly, respecting human rights and decent working conditions in their supply chain.
- **French Corporate Duty of Vigilance Law (2017):** requires large companies in France to manage their human rights and environmental risks effectively – both within the company itself and also its subsidiaries, subcontractors and suppliers.
- **EU Corporate Sustainability Reporting Directive (CSRD) (2024):** requires large companies to publish regular reports on the social and environmental risks they face and on how their activities impact people and the environment.
- **EU Directive on Corporate Sustainability Due Diligence (CSDD) (Proposed):** will require large companies to conduct due diligence to identify, prevent, or mitigate adverse impacts on the environment and human rights.

## 9.2. Responsible Marketing and Transparency

The topic of 'Responsible Marketing and Transparency' is increasingly significant in the jewellery sector, particularly in the context of sustainability claims. This area encompasses the ethical (and, increasingly, legal) responsibility of businesses to communicate their sustainability efforts honestly and transparently, avoiding the pitfalls of 'greenwashing' – a practice where companies make misleading or unsubstantiated claims about the environmental (or social) benefits of their products or practices<sup>96</sup>.

In recent years, there has been heightened scrutiny from consumers, regulators, and other stakeholders regarding the authenticity of sustainability claims. Despite this increased attention, the jewellery sector still faces challenges with the inconsistent use of terminology. Terms like 'responsibly sourced', 'ethical', and 'sustainable' are often used interchangeably without a clear, standardised definition, leading to confusion among consumers. Simply sourcing from a trusted supplier that you have worked with for many

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<sup>96</sup> *Greenwashing – the deceptive tactics behind environmental claims* (2022), United Nations; <https://www.un.org/en/climatechange/science/climate-issues/greenwashing>

years does not automatically ensure a sustainable supply chain, yet many companies continue to use these terms in their marketing and advertising materials, often without adequate systems in place to substantiate those claims or clearly define them.

For a claim about ESG-related matters to be credible, it must include detailed information about how those claims are supported in practice. Companies should aim to align their claims with recognised industry standards to ensure consistency and credibility across the industry. This alignment not only enhances consumer trust but also contributes to setting a level playing field within the industry.

Furthermore, the risks associated with making false or misleading sustainability claims extend beyond reputational damage. There is an increasing legal risk, as regulatory bodies in various jurisdictions are intensifying their scrutiny of greenwashing practices.

In the EU, for example, companies must observe the European Sustainability Reporting Standards (ESRS), intended to make sustainability, environmental and social reporting more accurate, consistent and comparable. The proposed European Directive on Green Claims<sup>97</sup> further tightens how company and product environmental claims are communicated, substantiated and verified. Individual national markets, like the Netherlands and France, have already issued their own guidelines and The UK's Advertising Standards Agency (ASA) has updated its environmental claims guidelines, aiming to provide clarity rather than seeking to ban such claims. And in the U.S., the Federal Trade Commission (FTC) offers guidance through its 'Green Guides' for environmental marketing claims, which are currently undergoing extensive review.

Businesses may therefore face legal investigations or penalties if their claims are found to be deceptive or unsubstantiated. This legal aspect underscores the importance of rigorous due diligence and transparency in all sustainability-related communications<sup>98</sup>.

Responsible marketing and transparency in the jewellery sector therefore requires a commitment to honesty, clarity, and accountability. Businesses must ensure that their sustainability claims are not only accurate and verifiable but also communicated in a way that is clear and understandable to consumers. Adopting and adhering to industry standards in making these claims can help to maintain consistency and build trust, both crucial in today's increasingly conscientious market.

However, it should also be acknowledged that, in considering how to contribute to progress on environmental, social and sustainability objectives, companies may find themselves

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<sup>97</sup> [https://environment.ec.europa.eu/topics/circular-economy/green-claims\\_en#Law](https://environment.ec.europa.eu/topics/circular-economy/green-claims_en#Law)

<sup>98</sup> *The Legal Risks of Greenwashing Are Real* (2022) Bloomberg Law: <https://news.bloomberglaw.com/environment-and-energy/the-legal-risks-of-greenwashing-are-real>

striving to move beyond current industry good practice. Many challenges will require new levels of commitment and ambition, and new forms of collaboration, which will need to be communicated both honestly and sensitively to ensure credibility. Companies will also need to be cautious of allowing their good intentions and aspirations to overtake their capacity to deliver and disclose. Action and progress is often best reported via existing frameworks and platforms using established metrics and methodologies, with some structure and discipline also applied to any public- or market-facing communications. Although appropriate tools and guidance may still be evolving for the jewellery industry, it can easily learn (and borrow) from other sectors<sup>99</sup>.

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<sup>99</sup> See, for example, the guidance in *Credibe ESG communication* (2023), PwC; <https://www.pwc.de/de/finanzdienstleistungen/credibile-esg-communication.pdf>

### 9.2.1. Best Practice Recommendations

#### **Best Practice: Responsible Marketing and Transparency**

**Clear and accurate claims:** Ensure that all sustainability claims are clear, accurate, and unambiguous. Avoid vague terms and phrases that could be misleading to consumers.

**Substantiate claims:** Provide verifiable evidence to support any sustainability claims. So if your claim is that you only use recycled gold in your jewellery products, provide information about how you know that. You might be sourcing from a refiner that is LBMA-accredited, or certified against the RJC Chain of Custody Standard, and is able to provide chain of custody documentation verifying that the origin of the gold is from known and trusted sources, or you might have carried out your own due diligence to determine the source. Alternatively, your claim might be based on a written guarantee from your own direct supplier. Whatever system you have in place to support your claim, always communicate it honestly and transparently.

**Adhere to recognised standards:** Align sustainability claims with recognised industry standards and definitions. Use established guidelines and frameworks to ensure consistency and reliability in claims.

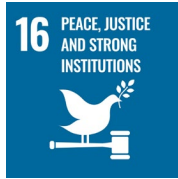
**Avoid overstatement:** Refrain from overstating the environmental or social benefits of products or practices. Ensure that claims do not exaggerate the positive impact. It is better to communicate honestly about smaller achievements and your longer term goals than to make promises that you are unable to substantiate.

**Educate consumers and other stakeholders:** Provide consumers and stakeholders with information and education about what your sustainability terms mean and avoid vague terminology like 'ethical' or 'Eco', unless you have provided a definition of these terms in your marketing materials.

**Legal compliance:** Stay informed about, and comply with, relevant advertising and marketing laws related to claims in the jurisdictions where the business operates.

**Train staff:** Train marketing and communications staff on responsible marketing practices to ensure that all promotional materials reflect the company's genuine sustainability efforts. Consumer facing staff should be able to explain what your sustainability claims mean and the processes you have in place to substantiate them.

## 9.2.2. Alignment with the SDGs



Goal	Description
16 - Peace, Justice and Strong Institutions	Promote just, peaceful and inclusive societies

**SDG 16** Encourages the development of accountable and transparent institutions. Responsible marketing aligns with this goal by promoting honesty and transparency in business communications, thus building trust in institutions and among consumers

## 9.2.3. Applicable Frameworks, Initiatives and Regulations

The following non-exhaustive list of international frameworks, initiatives and regulations are applicable to the topic of Responsible Marketing and Transparency.

### Global Frameworks and Initiatives:

- **International Sustainability Standards Board (ISSB)**, Emerging from the IFRS<sup>100</sup> in order ‘to develop standards for a global baseline of sustainability disclosures’, the ISSB’s two primary standards (S1 and S2) are currently being considered as the likely global defaults framework for future sustainability reporting. They are, however, fairly demanding and it is not clear how applicable they will be to SMEs
- **Global Reporting Initiative (GRI)**: Offers a comprehensive framework for sustainability reporting, guiding businesses on how to communicate their impact on critical sustainability issues, including ethical marketing practices. (However, with the emergency of the ISSB, its influence may wane.)
- **FTC Green Guides (US)**: Issued by the Federal Trade Commission, these guides strive to help marketers avoid making environmental claims that mislead consumers. The Guides are currently being updated – however, there are still questions as to how helpful and applicable they are to the jewellery industry<sup>101</sup>
- **International Chamber of Commerce (ICC) Advertising and Marketing Communications Code**: Sets forth ethical guidelines and standards for marketing and advertising to ensure responsible practices<sup>102</sup>.

<sup>100</sup> <https://www.ifrs.org/>

<sup>101</sup> See, for example, *About the FTC Green Guides (2023)*, JVC; <https://jvclegal.org/ftc-green-guides/>

<sup>102</sup> <https://iccwbo.org/news-publications/policies-reports/icc-advertising-and-marketing-communications-code/>

- **The Competition and Markets Authority (UK):** Provides guidance and enforcement for business compliance with consumer protection laws, ensuring truthful and honest marketing practices.
- **Australian Competition & Consumer Commission (ACCC) (US):** Enforces laws against misleading and deceptive conduct in advertising, including sustainability claims.
- **The Division of Advertising Practices (Division or DAP):** Enforces “truth-in-advertising” laws in the US, which require advertisers to tell the truth and to back up their claims with reliable, objective evidence.
- **Responsible Jewellery Council (RJC) Code of Practices (COP) Standard:** Provides a reference points for provenance and sustainability claims. Publicly available guidance is available for members and non-members.

#### **Current and Emerging Regulation:**

- **EU (Proposed) Directive on Green Claims (2023):** A draft law with the stated intention of ‘taking action to address greenwashing, and protect consumers and the environment’, focused on scrutinising the credibility of environmental labels and claims<sup>103</sup>.
- **EU Unfair Commercial Practices Directive (2019):** Prohibits unfair practices in commercial marketing within the European Union, including misleading and aggressive marketing tactics.
- **Consumer Protection from Unfair Trading Regulations (UK) (2008):** Protects consumers from unfair or misleading trading practices and bans misleading omissions and aggressive sales tactics.
- **Federal Trade Commission Act (FTC Act) (US) (1914) as amended:** Empowers the Federal Trade Commission to prevent unfair methods of competition, and unfair or deceptive acts or practices in the marketplace. It lays the foundation for ensuring that marketing practices are honest and not misleading.

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<sup>103</sup> [https://environment.ec.europa.eu/publications/proposal-directive-green-claims\\_en](https://environment.ec.europa.eu/publications/proposal-directive-green-claims_en)



## Appendix I – CIBJO Responsible Sourcing Policy & Guidance

As noted in the main body of this document, *Responsible Sourcing* is important in the jewellery industry, to protect the confidence of consumers in the industry and its products, as well as a foundational step to then allow the industry to demonstrate the sustainable economic and social opportunities it can create in the countries and regions in which it is active.

The CIBJO Responsible Sourcing Policy and “[Blue Book](#)” is a recommendation and guidance for the CIBJO membership and the wider jewellery supply chain, intended to provide a “duty of care” in jewellery industry supply chains<sup>104</sup>. CIBJO recognises that the Policy will be implemented as a process of continuous improvement, and the process and rate of implementation may vary considerably between different companies, supply chains and sectors.

The Responsible Sourcing Policy recommends guidelines and procedures which all participants in the jewellery supply chain may apply to provide assurance of responsible sourcing as far as possible through the member’s supply chain.

It provides guidance for responsible business practices and supply chain due diligence: it is not a system to address traceability of precious metals or gem materials to a mine source or pearl harvesting location and cannot be described or interpreted as a chain of custody. Likewise, the Guide does not constitute a standard or a compliance mechanism. CIBJO recommends that members who wish to pursue certification or any other formal recognition of their implementation of the policy should do so through international standards organisations such as those mentioned in the CIBJO Responsible Sourcing Guide.

CIBJO also provides an [online toolkit](#) which retailers can use to help them implement CIBJO’s guidance<sup>105</sup>.

It is not expected that all companies will be able to implement the guidance immediately, nor immediately comply with all associated standards and practices. But the guidance should be used, according to the company’s capacity, to drive continuous improvement in the demonstrable integrity of an individual company’s supply chain through due diligence.

The CIBJO Responsible Sourcing Policy follows the 5-step framework of the Organisation for Economic Cooperation and Development (OECD) Due Diligence Guidance for

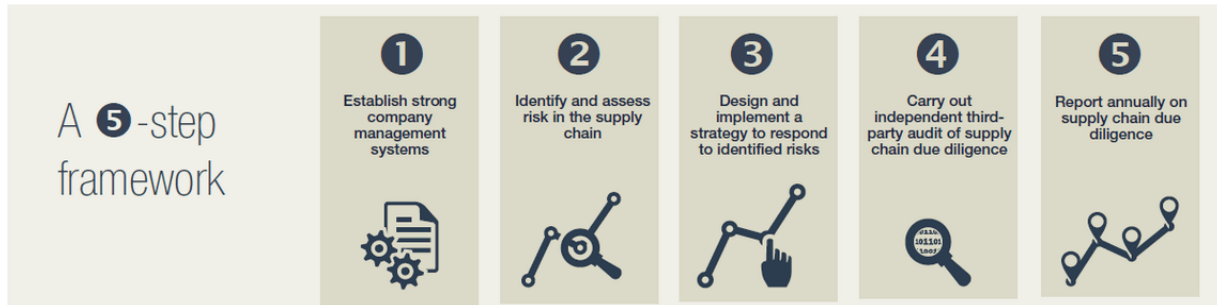
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<sup>104</sup> <https://www.cibjo.org/rstoolkit/wp-content/uploads/2020/04/19-01-06-Responsible-Sourcing-Book-.pdf>

<sup>105</sup> <https://www.cibjo.org/rstoolkit/rs-toolkit/>

Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, the Kimberley Process Certification Scheme and supports the United Nations Guiding Principles on Business and Human Rights.

**OECD's 5 step framework:**



The OECD Due Diligence Guidance<sup>106</sup> clarifies how companies can identify and better manage risks throughout the entire supply chain and is applicable to all precious metals and gem materials and is global in scope.

CIBJO recommends to all its members that they undertake due diligence on their own supply chains in accordance with the OECD's Due Diligence Guidance to ensure that these supply chains are responsibly managed.

Industry participants through the supply chain can choose to have their responsible practices and supply chain due diligence verified and/or certified by external and independent standards and certification mechanisms such as the Responsible Jewellery Council (RJC), the Responsible Minerals Initiative (RMI), SCS Responsible Source Standard, the London Bullion Market Association (LBMA), amongst others. Companies should seek certification from these organisations through the supply chain as part of their due diligence processes.

<sup>106</sup>[www.oecd.org/corporate/mne/mining.htm](http://www.oecd.org/corporate/mne/mining.htm)

## Appendix II – Reference organisations, materials and sites

The following resources and reference points are accurate at the time of publication, but the rapidly evolving ESG landscape and associated regulatory environments, alongside developing industry responses, mean the list should not be viewed as comprehensive or definitive. These documents should, however, provide sufficiently detailed knowledge and guidance to allow jewellery companies to demonstrate they are committed to responsible business practices and are acting to contribute to positive social and environmental outcomes.

Reference / Resource	Location / Source
<b>Business for Nature</b>	<a href="https://www.businessfornature.org/">https://www.businessfornature.org/</a>
<b>CIBJO</b>	<a href="https://www.cibjo.org">https://www.cibjo.org</a>
Responsible Sourcing Blue Book (2018)	<a href="https://www.cibjo.org/rstoolkit/wp-content/uploads/2020/04/19-01-06-Responsible-Sourcing-Book-.pdf">https://www.cibjo.org/rstoolkit/wp-content/uploads/2020/04/19-01-06-Responsible-Sourcing-Book-.pdf</a>
Responsible Sourcing Toolkit & Checklist	<a href="https://www.cibjo.org/rstoolkit/rs-toolkit/">https://www.cibjo.org/rstoolkit/rs-toolkit/</a>
Environmental, Social & Governance Principles for Laboratory-Grown Diamonds	<a href="https://cibjo.org/wp-content/uploads/2024/01/CIBJO-ESG-Principles-CIBJO-Congress-2023.pdf">https://cibjo.org/wp-content/uploads/2024/01/CIBJO-ESG-Principles-CIBJO-Congress-2023.pdf</a>
<b>Colored Gemstone Working Group</b>	
Gemstones and Jewellery Community Platform	<a href="https://www.gemstones-and-jewellery.com/">https://www.gemstones-and-jewellery.com/</a>
<b>Convention on Biological Diversity</b>	<a href="https://www.cbd.int">https://www.cbd.int</a>
The Kunming-Montreal Global Biodiversity Framework (GBF)	<a href="https://www.cbd.int/gbf/">https://www.cbd.int/gbf/</a>
<b>Diamond Development Initiative (DDI):</b>	<a href="https://www.ddinigeria.org/">https://www.ddinigeria.org/</a>
<b>Equal Pay International Coalition (EPIC)</b>	<a href="https://www.equalpayinternationalcoalition.org/">https://www.equalpayinternationalcoalition.org/</a>
<b>EU</b>	
EU Conflict Minerals Regulation (2021)	<a href="https://policy.trade.ec.europa.eu/development-and-sustainability/conflict-minerals-regulation/regulation-explained_en">https://policy.trade.ec.europa.eu/development-and-sustainability/conflict-minerals-regulation/regulation-explained_en</a>
EU Corporate Sustainability Reporting Directive (CSRD) (2024)	<a href="https://finance.ec.europa.eu/regulation-and-supervision/financial-services-legislation/implementing-and-delegated-acts/corporate-sustainability-reporting-directive_en">https://finance.ec.europa.eu/regulation-and-supervision/financial-services-legislation/implementing-and-delegated-acts/corporate-sustainability-reporting-directive_en</a>
EU Directive on Corporate Sustainability Due Diligence (CSDD) (Proposed):	<a href="https://commission.europa.eu/business-economy-euro/doing-business-eu/corporate-sustainability-due-diligence_en">https://commission.europa.eu/business-economy-euro/doing-business-eu/corporate-sustainability-due-diligence_en</a>
EU Circular Economy Action Plan (2020)	<a href="https://environment.ec.europa.eu/strategy/circular-economy-action-plan_en">https://environment.ec.europa.eu/strategy/circular-economy-action-plan_en</a>
EU Sustainable Products Initiative (2022):	<a href="https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12567-Sustainable-products-initiative_en">https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12567-Sustainable-products-initiative_en</a>
Ecodesign for Sustainable Products Regulation (proposed)	<a href="https://environment.ec.europa.eu/publications/proposal-ecodesign-sustainable-products-regulation_en">https://environment.ec.europa.eu/publications/proposal-ecodesign-sustainable-products-regulation_en</a>
EU Waste Framework Directive (2008)	<a href="https://environment.ec.europa.eu/topics/waste-and-recycling/waste-framework-directive_en">https://environment.ec.europa.eu/topics/waste-and-recycling/waste-framework-directive_en</a>
European Parliament and Council Directive on Packaging and Packaging waste (1994)	<a href="https://www.eea.europa.eu/policy-documents/directive-94-62-ec-on">https://www.eea.europa.eu/policy-documents/directive-94-62-ec-on</a>

EU Biodiversity Strategy for 2030:	<a href="https://environment.ec.europa.eu/strategy/biodiversity-strategy-2030_en">https://environment.ec.europa.eu/strategy/biodiversity-strategy-2030_en</a>
EU taxonomy for sustainable activities	<a href="https://finance.ec.europa.eu/sustainable-finance/tools-and-standards/eu-taxonomy-sustainable-activities_en">https://finance.ec.europa.eu/sustainable-finance/tools-and-standards/eu-taxonomy-sustainable-activities_en</a>
EU Nature Restoration Law (proposed)	<a href="https://environment.ec.europa.eu/topics/nature-and-biodiversity/nature-restoration-law_en">https://environment.ec.europa.eu/topics/nature-and-biodiversity/nature-restoration-law_en</a>
EU Deforestation Regulation (2023)	<a href="https://environment.ec.europa.eu/news/green-deal-new-law-fight-global-deforestation-and-forest-degradation-driven-eu-production-and-2023-06-29_en">https://environment.ec.europa.eu/news/green-deal-new-law-fight-global-deforestation-and-forest-degradation-driven-eu-production-and-2023-06-29_en</a>
European Directive on Green Claims	<a href="https://environment.ec.europa.eu/publications/proposal-directive-green-claims_en">https://environment.ec.europa.eu/publications/proposal-directive-green-claims_en</a>
European Directive: Empowering consumers for the green transition (proposed))	<a href="https://www.europarl.europa.eu/doceo/document/TA-9-2024-0018_EN.pdf">https://www.europarl.europa.eu/doceo/document/TA-9-2024-0018_EN.pdf</a>
<b>Greenhouse Gas (GHG) Protocol</b>	
Corporate Accounting and Reporting Standard	<a href="https://ghgprotocol.org/corporate-standard">https://ghgprotocol.org/corporate-standard</a>
<b>IFRS / The International Sustainability Standards Board (ISSB)</b>	
<b>Initiative for Responsible Mining Assurance (IRMA)</b>	
Standard for Responsible Mining	<a href="https://responsiblemining.net/what-we-do/standard/">https://responsiblemining.net/what-we-do/standard/</a>
<b>Jewellery Vigilance Council (JVC)</b>	
About The FTC Green Guides	<a href="https://jvclegal.org/ftc-green-guides/">https://jvclegal.org/ftc-green-guides/</a>
<b>Kimberley Process</b>	
Certification Scheme (KPCS) - Core Document	<a href="https://www.kimberleyprocess.com/en/system/files/documents/kpcs_document_en_0.pdf">https://www.kimberleyprocess.com/en/system/files/documents/kpcs_document_en_0.pdf</a>
<b>London Bullion Market Association (LBMA)</b>	
Responsible Gold Guidance	<a href="https://www.lbma.org.uk/publications/responsible-gold-guidance-v9">https://www.lbma.org.uk/publications/responsible-gold-guidance-v9</a>
<b>OECD</b>	
Due Diligence Guidance for Responsible Business Conduct	<a href="https://www.oecd.org/investment/due-diligence-guidance-for-responsible-business-conduct.htm">https://www.oecd.org/investment/due-diligence-guidance-for-responsible-business-conduct.htm</a>
Guidelines for Multinational Enterprises	<a href="https://www.oecd.org/corporate/mne/">https://www.oecd.org/corporate/mne/</a>
Due Diligence Guidance for Responsible Mineral Supply Chains	<a href="https://mneguidelines.oecd.org/an-international-standard-oecd-due-diligence-guidance-for-responsible-mineral-supply-chains.htm">https://mneguidelines.oecd.org/an-international-standard-oecd-due-diligence-guidance-for-responsible-mineral-supply-chains.htm</a>
Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas	<a href="https://www.oecd.org/corporate/mne/mining.htm">https://www.oecd.org/corporate/mne/mining.htm</a>
Handbook on Environmental Due Diligence in Mineral Supply Chains	<a href="https://www.oecd.org/publications/handbook-on-environmental-due-diligence-in-mineral-supply-chains-cef843bf-en.htm">https://www.oecd.org/publications/handbook-on-environmental-due-diligence-in-mineral-supply-chains-cef843bf-en.htm</a>
<b>Responsible Jewellery Council (RJC)</b>	
Code of Practices (2019)	<a href="https://www.responsiblejewellery.com/standards/code-of-practices-2019/">https://www.responsiblejewellery.com/standards/code-of-practices-2019/</a>
Chain of Custody standard (2017)	<a href="https://www.responsiblejewellery.com/standards/chain-of-custody-2017/">https://www.responsiblejewellery.com/standards/chain-of-custody-2017/</a>

RJC Roadmap to 2030	<a href="https://www.responsiblejewellery.com/wp-content/uploads/RJC-2030-Roadmap-narrative-Dec-2020-v1.3.pdf">https://www.responsiblejewellery.com/wp-content/uploads/RJC-2030-Roadmap-narrative-Dec-2020-v1.3.pdf</a>
<b>Science Based Targets initiative (SBTI)</b>	<a href="https://sciencebasedtargets.org/">https://sciencebasedtargets.org/</a>
Corporate Net-Zero Standard	<a href="https://sciencebasedtargets.org/net-zero">https://sciencebasedtargets.org/net-zero</a>
<b>Science Based Target Network (SBTN)</b>	<a href="https://sciencebasedtargets.org/about-us/sbtn">https://sciencebasedtargets.org/about-us/sbtn</a>
<b>Task Force on Climate-related Financial Disclosures (TCFD)</b>	
TCFD Recommendations	<a href="https://www.fsb-tcf.org/recommendations/">https://www.fsb-tcf.org/recommendations/</a>
<b>Task Force on Nature-related Financial Disclosures (TNFD)</b>	<a href="https://tnfd.global/">https://tnfd.global/</a>
<b>The Ellen MacArthur Foundation</b>	<a href="https://www.ellenmacarthurfoundation.org/">https://www.ellenmacarthurfoundation.org/</a>
<b>The Global Business Initiative</b>	
Human Rights Due Diligence Challenges for Business (2023)	<a href="https://gbih.org/updates/human-rights-due-diligence-challenges-for-business">https://gbih.org/updates/human-rights-due-diligence-challenges-for-business</a>
<b>The International Labour Organization (ILO)</b>	<a href="https://www.ilo.org">https://www.ilo.org</a>
<b>The Nature Positive Initiative (NPI)</b>	<a href="https://www.naturepositive.org/">https://www.naturepositive.org/</a>
<b>The US Securities and Exchange Commission (SEC)</b>	
Enhancement and Standardization of Climate-Related Disclosures for Investors (Proposed)	<a href="https://www.sec.gov/files/rules/proposed/2022/33-11042.pdf">https://www.sec.gov/files/rules/proposed/2022/33-11042.pdf</a>
<b>United Nations</b>	
The Sustainable Development Goals Report - Special Edition (2023)	<a href="https://sdgs.un.org/sites/default/files/2023-07/The-Sustainable-Development-Goals-Report-2023_0.pdf">https://sdgs.un.org/sites/default/files/2023-07/The-Sustainable-Development-Goals-Report-2023_0.pdf</a>
Guiding Principles on Business and Human Rights (UNGPs)	<a href="https://www.ohchr.org/en/publications/reference-publications/guiding-principles-business-and-human-rights">https://www.ohchr.org/en/publications/reference-publications/guiding-principles-business-and-human-rights</a>
Women's Empowerment Principles	<a href="https://www.weps.org/">https://www.weps.org/</a>
<b>Watch &amp; Jewellery Initiative 2030</b>	<a href="https://www.wjinitiative2030.org">https://www.wjinitiative2030.org</a>
WJI 2030 Human Rights Navigator	<a href="https://www.wjinitiative2030.org/human-rights-navigator/">https://www.wjinitiative2030.org/human-rights-navigator/</a>
WJI 2030 Nature Primer	WJI 2030 Nature Primer.pdf [on request]
Advancing Gender Equality Through Gender Responsive Procurement In The Watch And Jewelry Industry	<a href="https://www.wjinitiative2030.org/wp-content/uploads/2023/09/WJI-2030-X-UN-Women-Pilot-Report-2023.pdf">https://www.wjinitiative2030.org/wp-content/uploads/2023/09/WJI-2030-X-UN-Women-Pilot-Report-2023.pdf</a>
<b>Workplace Pride Foundation</b>	<a href="https://workplacepride.org/">https://workplacepride.org/</a>
<b>World Diamond Council</b>	<a href="https://www.worlddiamondcouncil.org/">https://www.worlddiamondcouncil.org/</a>
System of Warranties	<a href="https://www.worlddiamondcouncil.org/about-sow/">https://www.worlddiamondcouncil.org/about-sow/</a>
<b>World Gold Council (WGC)</b>	<a href="https://www.gold.org/">https://www.gold.org/</a>
Responsible Gold Mining Principles (2019)	<a href="https://www.gold.org/industry-standards/responsible-gold-mining">https://www.gold.org/industry-standards/responsible-gold-mining</a>
Conflict-Free Gold Standard (2012)	<a href="https://www.gold.org/industry-standards/conflict-free-gold">https://www.gold.org/industry-standards/conflict-free-gold</a>
<b>Zero Waste International Alliance</b>	<a href="https://zwia.org/">https://zwia.org/</a>