

## System of Warranties (SoW) Self Assessment

<b>Completion Date</b>	28-Oct-2021
<b>Status</b>	Valid
<b>Expiry Date</b>	27-Oct-2022
<b>Registered Entity Name</b>	Harriet Kelsall Bespoke Jewellery Ltd
<b>Unique Number</b>	<i>DFEB0194</i>

### Registered Entity/Group Information

<b>Registered and/or Trading address</b>	Harriet Kelsall Jewellery Design Ltd North Barn, Fairclough Hall Farm, Halls Green, Weston, Hitchin, Hertfordshire, SG4 7DP
<b>Country</b>	GB
<b>Registered number</b>	4523060
<b>Number of Employees</b>	100
<b>Do you buy/sell rough diamonds?</b>	No
<b>Do you purchase diamonds from artisanal small scale mining sources?</b>	No
<b>What part of the diamond supply chain are you engaged in?</b>	<ul style="list-style-type: none"> <li>• Jewellery manufacturer and/or wholesaler</li> <li>• Jewellery retailer</li> </ul>
<b>Are you externally audited for your business practices, i.e. RJC, BPP?</b>	Yes
<b>Audited standard</b>	RJC
<b>Certificate / audit report number</b>	0000 3534

The following questions are marked as **N/A (not applicable)** because the entity/group is third-party audited.

### Kimberley Process Certification Scheme

No.	Question	Answer
1	Do all rough diamond imports and exports made have a KP Certificate?	N/A due to filters applied
2	Does the company make sure that it does not buy/receive on memo rough diamonds from suspect sources or unknown suppliers, or rough diamonds which originate in countries that are not member of the KP and/or have not duly implemented and/or enforced the KPCS regulations prohibiting the trade in conflict diamonds and officially communicated as such, with possible additional restrictions upon an advisory by a governmental authority of the company's country of registration?	N/A due to filters applied

No.	Question	Answer
3	Does the company ensure that all company employees who buy or sell diamonds within the diamond trade are well informed regarding trade resolutions and government regulations prohibiting the trade in conflict diamonds and respect these procedures at any time?	N/A due to filters applied
4	Does the company keep as per national relevant legal requirements or (if not set) at least for a period of three years the daily buying, selling or exporting records listing the names of suppliers and/or buyers, their license number and the amount and value of diamonds sold, exported or purchased?	N/A due to filters applied
5	Does the company carry out audit and reconciliation of the daily buying, selling or exporting records on an annual basis to ensure that all rough diamonds traded can be traced (e.g. to imports or exports with valid KP certificates)?	N/A due to filters applied
6	Is the company able to prove compliance with the KPCS by submitting the daily buying, selling or exporting records when asked for by a duly authorised government agency?	N/A due to filters applied

### Industry Self-Regulation

No.	Question	Answer
7	Does the company make WDC SoW warranty statements on all its invoices and memos?	N/A due to filters applied
8	Does the company only buy diamonds from companies that include the WDC warranty declarations on their invoices and memos?	N/A due to filters applied
9	If polished diamonds or jewellery are being purchased from other sources e.g. from private individuals, the secondary market or auction houses, does the company carry out the necessary due diligence and ascertains to the best of its ability that the goods purchased are in compliance with spirit of the System of Warranties regulations otherwise you confirm that the company does not source any diamonds from the secondary market or individuals)?	N/A due to filters applied
10	Does the company keep records of the invoices with the warranty received and the invoices with the warranty issued when buying or selling diamonds for at least three years?	N/A due to filters applied
11	Does the company reconcile the flow of warranties in and warranties out on an annual basis?	N/A due to filters applied
12	Do the company's bookkeepers/auditors/external accountants conduct audit of warranties in and warranties out on an annual basis? (Does the company also participate in a relevant government control mechanism checking whether the company duly reconciles the flow of warranties if required so by the government?)	N/A due to filters applied

### Compliance

No.	Question	Answer
13	Does the company have a commitment to respect human rights and follow all relevant national laws and that commitment is in line with the UN Guiding Principles on Business and Human Rights?	N/A due to filters applied
14	Does the company have operating and management procedures to avoid directly causing or contributing to adverse human rights impacts through its own activities?	N/A due to filters applied
15	Does the company mitigate and/or remediates adverse human rights impacts where it identifies that it has directly caused or contributed to said impacts?	N/A due to filters applied
16	Does the company seek to mitigate adverse human rights impacts that are indirectly linked to products or services supplied by its business partners, even if it has not contributed to those impacts	N/A due to filters applied
17	Does the company have a written labour policy and complies with all national labour legislation?	N/A due to filters applied

No.	Question	Answer
18	Does the company have a written commitment not to make use of any form of forced, bonded or compulsory labour throughout its operations?	N/A due to filters applied
19	Does the company comply with the minimum age requirements for admission to employment or work in consistence with the fullest physical and mental development of young persons?	N/A due to filters applied
20	Does the company employ in accordance with national law, including (if relevant) according to a list of job functions that can safely be performed by young persons below the age of 18 in cases of their employment?	N/A due to filters applied
21	Does the company seek to prevent workplace harassment and ensure that decisions concerning hiring, wages, promotion, training, discipline, retirement and termination are based only on unbiased criteria and are not linked to any of the discriminatory characteristics such as race, colour, sex, sexuality, language, religion, political or other opinion, national, ethnic or social origin, disability, birth or other status of an employee?	N/A due to filters applied
22	Does the company take appropriate preventative and disciplinary actions against discrimination with regard to grounds of discrimination (e.g. age, gender and ethnic origin) and aspects of employment (e.g. recruitment, promotion and remuneration)?	N/A due to filters applied
23	Does the company investigate all complaints of workplace harassment and provides for effective external/internal grievance mechanisms and remedies?	N/A due to filters applied
24	Does the company have a written anti-corruption policy in line with all national anti-corruption legislation?	N/A due to filters applied
25	Does the company have a mechanism to evaluate the risk of corruption when workers, agents, intermediaries or consultants deal with public officials (including workers of state owned companies), officers and employees of other companies or any other persons capable of unduely assisting the company in any way?	N/A due to filters applied
26	Does the company ensure that payments to agents, intermediaries and consultants are legal and in line with standard payments for other service providers of similar ranking?	N/A due to filters applied
27	Does the company require all directors and managers to behave ethically and in conformity with all relevant national laws in accordance with its anti-corruption commitments?	N/A due to filters applied
28	Do the company's anti-corruption procedures include how to handle requests for facilitation payments, giving and receiving gifts, engaging in sponsorships, giving political contributions, and how to conduct responsible lobbying?	N/A due to filters applied
29	Is information on disciplinary procedures for violations of company anti-corruption policies available to employees?	N/A due to filters applied
30	Does the company have a whistle-blowing policy by which employees can safely report suspicion of corruption related cases (e.g. hotline or mailbox) and allocates resources to systematically address the issues that are identified?	N/A due to filters applied
31	Does the company evaluate the risk of internal and external conflicts of interest in relation to business partners?	N/A due to filters applied
32	Do the company's internal procedures support its anti-corruption commitment?	N/A due to filters applied
33	Does the company conduct due diligence (e.g. financial, legal, labour, tax, IT, environment, market/commercial) on all agents, intermediaries and consultants?	N/A due to filters applied
34	Does the company have a written AML/CTF policy in accordance relevant national laws and in line with FATF Guidance for Dealers in Precious Metals and Precious Stones?	N/A due to filters applied
35	Does the company have a procedure in place to ensure that all company employees who buy or sell diamonds are well informed regarding AML/CTF policies and procedures adopted in the company?	N/A due to filters applied
36	Does the company obtain, update and maintain due diligence (KYC) of all its counterparties to screen for potential risks and to develop a (risk) profile of the business partner, incl. enhanced due diligence for higher risk countries, products, services and business partners if involved in international transactions?	N/A due to filters applied

No.	Question	Answer
37	Does the company have designated one or more employees responsible for AML/CTF issues?	N/A due to filters applied
38	Does the company follow internal and/or external reporting procedures for potentially suspicious or atypical transactions in accordance with relevant national laws?	N/A due to filters applied

***Sourcing from Artisanal Sector***

No.	Question	Answer
39	When sourcing rough diamonds directly from Artisanal sector does the company promote the implementation of the intergovernmental Forum on Mining, Minerals, Metals and Sustainable Development “Mining Policy Framework” and Moscow and Washington declarations of the KPCS to enhance the quality of life of artisanal miners and their families?	N/A due to filters applied