

Results of GW and AI USA Survey on Top Retailers' Policies to Combat Blood Diamonds

Name of Company, Top Retailers by Sales ^I	Written response to GW/AI received from the company management ^{II}	Does the company in its letter to GW/AI outline adoption of the system of warranties? ^{III}	Does the company in its letter to GW/AI outline auditing and other measures taken to combat conflict diamonds? ^{IV}	Is a policy on conflict diamonds described on the company's website? ^V	Members of jewelry trade association – Jewelers of America (JA), Jewelers Vigilance Committee (JVC), Council for Responsible Jewelry Practices (CRJP) ^{VI}
1. Wal-Mart Sales: \$2.7 billion	Yes	Yes	Not clear – In letter, Wal-Mart states it has “implemented procedures to verify” that the system of warranties is being implemented but no further information is provided.	Yes, but does not fully outline policy	JVC member
2. Sterling (subsidiary of Signet Group) Sales: \$2.3 billion	Yes	Yes – Provided sample invoices with the warranty statement, as well as the company's supplier code of conduct, 2005 conflict diamond review, corporate audit plan, jewelry purchasing terms and conditions, and educational brochures on their policy for the public.	Yes – Letter from Signet Group (Sterling is a subsidiary of Signet Group) outlines comprehensive policy to combat conflict diamonds, including internal and third party auditing procedures for rough and polished stones. Signet also provided extensive documents to demonstrate its policy, including its internal audit plan for UK & US to responsibly source diamonds and invoices with warranty statement.	Yes	JA, JVC and CRJP member
3. Zale Corporation Sales: \$2.2 billion	Yes	Yes	Yes but more should be done – No mention in letter of auditing procedures or efforts to make sure that suppliers' have concrete policy measures to back up written warranties. But, the website outlines “Our executive management monitors compliance with the system of warranties and updates the Company's procedures when necessary,” and the company's support for independent third-party monitoring through its participation in CRJP. Zale Corporation informed Global Witness in a letter dated March 12, 2007 that Zale's recently completed its annual certification process which resulted in 100% compliance of its suppliers with the system of warranties and believes that this approach constitutes an internal audit.	Yes – detailed policy outlined.	JA, JVC and CRJP Member

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III This column notes whether companies have adopted the system of warranties based on company responses. This entails meeting the guidelines set out in the World Diamond Council's *Essential Guide for the Kimberley Process* for jewellery retailers. This includes companies insisting that their suppliers provide warranties for diamonds polished after January 1, 2003, retaining these warranties for 5 years and educating employees about these requirements.

IV This column provides a description of additional measures that companies are taking to combat the trade in combat conflict diamonds that go beyond what the voluntary system requires, based on what is outlined in company responses to Global Witness and Amnesty International. Additional measures include internal and third-party auditing measures and acquiring more information from suppliers (in addition to the warranty) about their policies to combat conflict diamonds. Companies may have described their policies completely in other places but this column is based on what was provided in company responses to Global Witness/Amnesty International.

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4. QVC Sales: \$1.4 billion	Yes	Yes	No	Yes	JVC Member
5. J.C. Penney Sales: \$1.2 billion	Yes	Yes	No	Yes – brief mention in Legal Compliance section.	JVC Member
6. Tiffany & Co. Sales: \$1.2 billion	Yes	Yes – Provided sample invoices with the warranty statement, as well as their vendor code of conduct and sustainability information packet.	Yes – letter outlines comprehensive policy to combat conflict diamonds, including a “mine-of-origin” strategy for rough diamonds purchased, establishment of a chain of custody for diamonds procured that has been certified and maintained to ISO 9001:2000 quality standard, internal and external audits of rough and polished procurement departments and external audits of third-party factories where Tiffany diamonds are polished.	Yes	JA, JVC & CRJP member
7. Sears Roebuck & Co. Sales: \$1 billion	No (did respond to the 2004 survey)	Response to 2004 survey outlining its adoption of the system of warranties and education of staff but did not provide any information on auditing procedures.	No according to 2004 response.	No	JVC Member
8. Finlay Fine Jewelry Sales: \$990 million	Yes	Yes	Yes but more should be done – briefly mentions that its records on the warranties “are open for inspection by Deloitte & Touche LLP, our independent auditors”.	No	JVC member
9. Helzberg Diamond Shops Sales: \$520 million	Yes	Yes – provided example invoices with the warranty statement as well as the company's diamonds supplier certificate of compliance, past letters to suppliers, and a certificate of assurance for consumers.	Yes – letter from Helzberg outlines comprehensive policy to combat conflict diamonds, including appointment of a KP compliance officer, internal and third-party auditing procedures to help ensure that goods purchased come from legitimate sources and a toll free Ethics Hotline.	Yes	JA, JVC and CRJP member

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10. Fred Meyer Jewelers Sales: \$455 million	Yes	Yes – provided sample invoices with the warranty statement as well as the company's system of warranties statement for suppliers and an example supplier response.	Yes but more should be done – letter outlines adoption of internal auditing procedures to verify implementation of system of warranties. Several samples of invoices are provided. No mention on measures taken to help verify that suppliers are responsibly sourcing diamonds beyond the written warranty.	Yes	JA Member
11. Costco Wholesale Corp. Sales: \$425 million	Still no response (surveyed in 2004 but did not respond)	Not clear – website briefly states Costco's support for abolishing conflict diamonds and generally states that Costco sells diamonds that are obtained from legitimate sources not involved in funding conflict and that it complies with the Kimberley Process.	No according to website.	Yes	No
12. Home Shopping Network Sales: \$420 million	Still no response (surveyed in 2004 did not send a response outlining policy)	N/A	N/A	No	JVC member
13. Target Stores Sales: \$415 million	Still no response (surveyed in 2004 but response did not outline policy). The company informed GW/AI USA that it does not participate in surveys.	N/A	N/A	No	No
14. Shop NBC Sales: \$400 million	Still no response (surveyed in 2004 but did not respond). The company informed GW/AI USA that it does not participate in surveys.	N/A	N/A	No	No

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15. Jewelry Television Sales: \$390 million	No	N/A	N/A	Yes	No
16. Neiman Marcus Sales: \$380 million	Yes	Yes – letter states that the company will “aggressively investigate” allegations that blood diamonds have been sold in its operations but that these allegations have “only rarely been received.”	No	No	JVC member
17. Macy's East Sales: \$350 million	Still no response (surveyed in 2004 but did not respond) ¹	N/A	N/A	No	No
18. Whitehall Jewellers Sales: \$334 million	Yes	Yes	No	Yes	JVC Member
19. Friedman's Sales: \$325 million	Yes	Yes	No	Yes	JVC Member
20. Macy's West Sales: \$310 million	Yes.	Yes, but very little information provided.	No	No	No
21. Ross-Simons Sales: \$300 million	Still no response (surveyed in 2004 and did not respond)	Unclear – website briefly outlines Ross-Simons' support of the Kimberley Process and that it buys diamonds from manufacturers who provide documentation that diamonds were obtained through legitimate channels. No further information is provided.	Unclear from website.	Yes	JA and JVC member
22. Tourneau Sales: \$250 million	No ²	N/A	N/A	No	JA and JVC member
23. Ben Bridge Jeweler Sales: \$220 million	Yes	Yes	No	No	JA, JVC and CRJP member
24. Blue Nile Sales: \$203 million	No ³	Yes – website outlines adoption of system of warranties.	Unclear from website.	Yes	JVC Member

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25. Kohl's Corp. Sales: \$200 million	Still no response (surveyed in 2004 but did not respond) ⁴	N/A	N/A	No	No
26. Kmart Sales: \$175 million (tie)	Still no response (surveyed in 2004 but did not respond) ⁵	N/A	N/A	No	No
27. Saks Fifth Avenue Sales: \$175 million (tie)	No ⁶	Unclear – response to 2004 survey stated that the company was in the process of implementing the system of warranties.	N/A	No	No
28. Fortunoff Sales: \$160 million (tie)	Yes	Yes – provided sample invoices with the warranty statement, as well as their letter to and contract with suppliers for implementation of the Kimberley Process.	No	No	JA and JVC member
29. Meijer Sales: \$160 million (tie)	No – the company informed GW/AI USA that it does not participate in surveys ⁷	N/A	N/A	No	No
30. Birks and Mayors Jewelers (formerly Mayors) Mayors Sales: \$143 Million	Yes	Yes – provided a copy of their conflict diamond policy that is also available on their website	Yes but more should be done – letter states that “it reserves the right to audit their diamond suppliers to ascertain compliance.” It also states that it was initiator of program to track diamonds mined in Canada and was one of the first jewelers to acquire and sell diamonds mined in Canada. No details on auditing procedures.	Yes	No
31. Goldenwest Diamond Corp. Sales: \$133 million	Still no response (surveyed in 2004 but did not respond)	N/A	N/A	No	No
Crescent Jewelers Sales: \$130 million (tie)	See response for Friedman's – Crescent Jewelers is now part of Friedman's	N/A	N/A	Yes	JA member

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32. Mervyn's Sales: \$130 million (tie)	Still no response (surveyed in 2004 but did not respond)	N/A	N/A	No	No
33. T.J. Maxx Sales: \$120 million (tie)	Still no response The company informed GW/AI USA that it does not participate in surveys.	N/A	N/A	No	No
34. Army/Air Force Exchange Service Sales: \$120 million (tie)	Yes	Unclear - very brief response by e-mail from the company states that "AAFES only does business with vendors that are in compliance" with the warranty statement but no further details are provided.	No	No	JA and JVC member
35. Reeds Jewelers Sales: \$110 million	Yes	Yes – Provided sample invoices with warranty statement as well as the company's merchandise vendor business agreement, educational materials for the public, sample training agendas and other information produced by WDC.	No	No	JA and JVC member
36. Samuels Jewelers Sales: \$100 million (tie)	Yes	Yes – the company provided samples invoices with the warranty statement as well as a sample certificate of sale that the diamonds are conflict-free for consumers.	Yes but more should be done – the letter does mention that they conduct a background check of every supplier to ensure suppliers are responsibly sourcing diamonds. No mention of auditing procedures.	Yes, the warranty statement is provided but no further details.	No
37. Hannoush Jewelers Sales: \$100 million (tie)	No (responded to 2004 survey)	Unclear – Response in 2004 did not outline policy but only included copy of invoice with warranty statement and educational materials.	N/A	No	JA and JVC member

Endnotes

1 Macy's East was faxed the survey letter on January 30, 2007.

2 Tourneau was first faxed the survey letter on February 5, 2007.

3 Blue Nile was faxed the survey letter on December 16, 2006.

4 Kohl's was faxed the survey letter on January 26, 2007.

5 Kmart was faxed the survey letter on January 26, 2007.

6 Saks Fifth Avenue was faxed the survey letter on January 26, 2007.

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