

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

Name of Company ^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 jewellery trade associations- British Jewellers' Association (BJA), National Association of Goldsmiths (NAG), Council for Responsible Jewellery Practices (CRJP), or Jewelers of America (JA) ^{VI}
1. ASDA	Yes	Yes	No – In the letter, the company states that they aim to ensure “that we have full traceability of our products” but no further information is provided on additional measures to help verify that suppliers are responsibly sourcing diamonds beyond the written warranty.	No	No
2. Asprey London	Yes	Yes – Provided a statement from supplier with warranty.	No	No	NAG
3. Beaverbrooks The Jewellers	Yes	Yes – The company states that all staff have been educated about the Kimberley Process and that they carry out periodic test shopping using external sources to verify staff understanding of the issues.	No	Yes	NAG
4. Berens & Co	Yes	Yes	No	No – The company intends to post the policy when the website is next updated.	No
5. Boodle & Dunthorne	Yes	Yes, but little information is provided.	No	Yes – Brief mention of policy.	NAG
6. Bulgari UK	Yes	Yes – Provided a copy of company policy on conflict diamonds. The letter states that employees have been trained.	Yes but more should be done – The letter outlines adoption of internal auditing procedures to verify implementation of the system of warranties. There is no mention of measures taken to help verify that suppliers are responsibly sourcing diamonds beyond the written warranty, or of third-party auditing measures.	Yes	JA, CRJP

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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 to Implementing 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 conflict diamonds that go beyond what the voluntary system requires, based on company responses to Global Witness/ Amnesty International (companies may have described their policies completely in other places). 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.

A “Yes” in this category means that a company has gone beyond the voluntary system and has outlined a comprehensive policy to combat conflict diamonds, including auditing measures, responsibly sourcing policies and other measures for ensuring that suppliers back up the warranty statement, and has developed policy statements or other materials that clearly communicate the policy to consumers.

B “Yes but more should be done” means that a company has taken some additional measures beyond the system of warranties but did not address all questions raised in the letter such as auditing procedures and efforts to ensure that suppliers are responsibly sourcing diamonds.

C “Unclear” means that it is not clear if company is taking additional measures because not enough information is provided.

D “No” means that a company has not taken additional measures beyond the system of warranties.

V The word “No” indicates that a company does not describe its policy on the website. Global Witness/ Amnesty International did searches on the company websites for “Kimberley Process” and “conflict diamonds” as search parameters. It is possible that information on policies is located outside of these search parameters.

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7. Cartier	Yes	Yes – Provided copy of the company's Diamond Policy, a sample letter to suppliers and a sample invoice.	Yes – The letter from Cartier outlines an auditing system that includes internal and external auditing of the company's policy to combat conflict diamonds. Suppliers can also be audited at any time by an external firm on all aspects of Cartier's diamond policy, although such steps have never been taken concerning the conflict diamond issue.	Yes	CRJP, JA
8. Catherine Jones	Yes	Yes	No	Yes, although little detail is provided about the company's conflict diamond policy.	BJA
9. Chatila	No	N/A	N/A	No	No
10. Chisholm Hunter	Yes	Yes – Provided a copy of letters sent to suppliers requesting compliance with the system of warranties.	No – According to the letter, the company requires "signed reassurance from [our suppliers] that they are in full compliance with their own responsibilities," but there is no further information or mention of concrete measures taken to help verify that suppliers are responsibly sourcing diamonds beyond the written warranty. There is no mention of third-party audits.	No – They intend to post a statement when the site is next updated.	NAG
11. Clive Ranger	Yes	Yes – Provided a copy of company's "ethical diamond policy", a copy of a letter from a supplier confirming compliance with the system of warranties, and a copy of an invoice with the warranty.	No – According to their letter, the company "has made personal visits to many [supplier] production sites" but does not mention carrying out audits, or implementing additional measures to verify that suppliers can back up written guarantees with concrete policies.	Yes	JA, JVC, CRJP

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12. Clogau Gold of Wales	No	N/A	N/A	Yes – brief mention.	No
13. County House Retail	No	N/A	N/A	No	BJA
14. Debenhams	Yes, but did not provide any written answers.	Yes, according to the company's website.	No	Yes, although little information is provided.	No
15. Dejoria	Yes	Yes – Provided a copy of conflict diamond policy	No	Yes – There is a link to the policy on the homepage.	BJA
16. Dianoor Jewels	No	N/A	N/A	No	No
17. Dinny Hall	Yes	Yes, but very little information is provided as to how system of warranties is implemented. Staff is informed about the Kimberley Process and World Diamond Council pamphlets are available in stores.	No	No	No
18. E.P. Mallory & Son	Yes	Yes – Provided a copy of an invoice with warranty.	No	No	No
19. EMDICO	Yes	Yes	Unclear – The company states that it conducts an annual internal financial audit and that “our accountants are aware of the issues involved with regard to conflict diamonds.” No information is provided on whether the system of warranties is audited and actions are taken to verify that suppliers are backing the written warranty with concrete policy measures.	No (website is 5 or 6 years old and since then has been “dormant”)	BJA

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20. F. Hinds	Yes	Yes – Staff is sent educational material on conflict diamonds and must confirm they have read and understood it.	Yes but more should be done – According to letter, independent financial auditors double check the internal auditing system and carry out regular, random spot checks. There is no mention of additional measures taken to verify that suppliers are responsibly sourcing diamonds beyond the written warranty.	Yes, comprehensive information is provided.	NAG
21. Finnies the Jewellers	Yes	Yes – Provided a copy of their policy as drafted by buying group, The Company of Master Jewellers; provided copies of several invoices with warranty.	Unclear – In response to the questionnaire, company states that they audit their system of warranties but describes the process simply as checking invoices for the warranty statement. This does not constitute internal auditing. ¹	No – The company will consider placing policy on the website during its next review.	BJA
22. Folli Follie	No	N/A	N/A	No	No
23. Fraser Hart	Still no response (surveyed in 2004 but did not respond)	N/A	N/A	Yes – Website outlines adoption of the system of warranties.	NAG
24. Garrard	Yes	Unclear – The company states that it only sources diamonds from countries that participate in the Kimberley Process, but does not provide any details on whether or how the system of warranties is implemented.	No	No	NAG
25. Goldsmiths Plc	Yes	Yes but very little information is provided.	No	Yes, brief mention.	No
26. Graff Diamonds	No	N/A	N/A	No	No

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27. Hamilton & Inches	Yes	Yes	No	No	No
28. Hancocks & Co Jewellers	No	N/A	N/A	No	No
29. Harriet Kelsall	Yes	Yes – Provided copy of an educational staff guide with information on the company's policy on conflict diamonds, the Kimberley Process, and countries affected by conflict diamonds.	No	No	BJA, NAG, CRJP
30. Herbert Brown & Son Ltd	No	N/A	N/A	No	NAG
31. House of Fraser	No	N/A	N/A	No	No
32. HPJ Jewellers	Yes	Yes	No	Yes	BJA
33. J.J. Rudell & Co	Yes	Yes	Unclear – The company states that they audit their system of warranties but describes this procedure as follows: "each delivery is checked to see that the warranty is printed on the invoice". This does not constitute internal auditing and no further information is provided.	No – The policy will be added when the site is next updated.	NAG
34. John Lewis	No (did respond to the 2004 survey)	The 2004 submission stated that the company followed the recommendations of the BJA and had written to suppliers informing them to confirm all diamonds were conflict-free.	N/A	No	No

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35. Laing the Jeweller	Yes	Yes – Provided a copy of conflict diamonds policy and copy of invoice with warranty.	Yes but more should be done – Company states that “system is audited through our normal statutory financial auditing and reporting procedures by independent accountants.” It is not clear whether they have procedures to make sure that suppliers have concrete policy measures to back up written guarantees.	Yes, but little information is provided.	NAG
36. Links of London	Yes	Yes	No	Yes but very little information is provided.	No
37. Moussaieff Jewellers	No	N/A	N/A	No	No
38. Ortak Jewellery	Yes	Yes – Staff is trained to answer questions on the issue of conflict diamonds.	No	No	BJA
39. Signet Group (representing subsidiaries Leslie Davis, Ernest Jones, H Samuel)	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, jewellery purchasing terms and conditions, and educational brochures on their policy for the public.	Yes – The letter from Signet Group outlines a comprehensive policy to combat conflict diamonds, including internal and third party auditing procedures for rough and polished stones (external audit has been completed in the US division and will soon be completed in the UK). 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 statements.	Yes – comprehensive policy is outlined	CRJP

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40. Theo Fennell	Yes	Yes – Provided a copy of an invoice with warranty, and copies of letters from suppliers confirming compliance with the system of warranties; staff is trained to answer questions about conflict diamonds and are provided with World Diamond Council material.	Unclear – In letter company states that “it is important to us that our colleagues are confident that we have an audit process in place with our suppliers”. However the letter also states: “with regards to auditing our supply chain we rely on working closely and knowing our supply partners well”. No further information is provided on how this is done. The company states that they conduct visits to suppliers' establishments.	Yes, brief mention of the Kimberley Process but no description of policy.	BJA, NAG
41. Tiffany & Co.	Yes	Yes – Provided sample invoices with the warranty statement, as well as their vendor code of conduct and sustainability information packet.	Yes – The letter outlines a 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 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 processed.	Yes – comprehensive policy is outlined in Conflict Diamonds Customer Guide	JA, JVC, CRJP
42. Warren James (Jewellers) Ltd	Yes	Yes – Provided copies of invoices with warranty, and copies of letters from suppliers confirming compliance with system of warranties.	Unclear. In a letter to suppliers, the company stated that they were auditing their Kimberley Process System, but no further information is provided about what the audit entails or how often it is carried out.	Yes but very little information is provided.	NAG

Endnotes

¹ Global Witness and Amnesty International UK believe that an internal audit involves the development and implementation of internal procedures, spot checks and reviews to ensure that a company's policy to combat conflict diamonds is effectively implemented in practice. An internal audit goes beyond simple implementation and review of the system of warranties.

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^V The word “No” indicates that a company does not describe its policy on the website. Global Witness/ Amnesty International did searches on the company websites for “Kimberley Process” and “conflict diamonds” as search parameters. It is possible that information on policies is located outside of these search parameters.

^{VI} This is based on membership lists of BJA, NAG, JA, JVC, or CRJP as provided on their websites, or based on information provided by the companies in their response. Note that companies may be members of other trade associations that may subscribe to the self-regulation and system of warranties, or companies may have subscribed to the self-regulation on an individual basis.