

2. Human Rights Due Diligence Review - 01-01-2026								
2.1 Human Rights Issue (including COP Reference and Risks)	No.	2.2 Indicator	2.3 Tips and Guidance	2.4 Your Response	2.5 Recommended Next Steps	2.6 Supporting Information / Evidence	2.7 Next Review Date	2.8 Comments / Notes
		Below are indicators or types of systems and processes that the Member should have in place.	Tips and issues to consider when preparing the response and supporting notes / evidence for each indicator. (Click on the cell to be able to scroll down.)	Please note whether you meet this indicator. (Select form the menu options)	Based on your response, a message will be generated that recommends the next steps for you.	Please list any supporting notes, evidence, relevant information and/or an explanation for your response.	Nominate the next Human Rights Due Diligence review date.	Comments or notes about the risk.
Use the toolkit to confirm implementation of these core human rights-related COP requirements.								
General Employment Terms (COP 13) • Right to Privacy	1	Privacy rights of employees are respected when gathering personal information or implementing employee-monitoring practices.	Privacy legislation is a good example of a human right now enshrined in the applicable law of most countries. Consider how you provide for safe storage of private information about employees and applicants in recruitment processes. Make sure employees know under what circumstances their emails or internet access etc may be accessed. Where appropriate for the size of your business, consider a privacy policy, outlining data collection and monitoring practices, how the information is stored, who has access, and why the information is necessary. Make sure employees can have access to all personal data collected about them.	Broadly managed	Please document the processes and controls used to support this response. No further action is required unless there is a change to the business.	Human Rights policy and Procedure Document	01-Jan-27	Low
Child Labour (COP 17) • Abolition of child labour • Right to education	2	Minimum age and appropriate work requirements of the Code of Practices are being upheld.	Check your responses in the RJC Assessment Workbook (your Self Assessment). Consider both the general minimum working age (generally 15 years old) and that for hazardous work (generally 18 years old). See the Child Labour Standards Guidance chapter for more information.	Broadly managed	Please document the processes and controls used to support this response. No further action is required unless there is a change to the business.	Policy and Procedure Document	01-Jan-27	Low
Child Labour (COP 17) • Abolition of child labour • Right to education	3	If the Member becomes aware of a situation of child labour, a documented remediation process is developed.	Check your responses in the RJC Assessment Workbook (your Self Assessment). Consider both the general minimum working age (generally 15 years old) and that for hazardous work (generally 18 years old). See the Child Labour Standards Guidance chapter for more information.	Not Applicable	Please document the reason for the Not Applicable Response.	Policy and Procedure Document	01-Jan-27	Not Applicable
Forced Labour (COP 18) • Abolition of slavery and forced labour • Freedom of movement	4	The Member does not use forced labour in its various forms in accordance with the Code of Practices.	Check your responses in the RJC Assessment Workbook (your Self Assessment). Consider risk re direct forced labour, restrictions on freedom of movement, and risks of human trafficking. See the Forced Labour Standards Guidance chapter for more information.	Broadly managed	Please document the processes and controls used to support this response. No further action is required unless there is a change to the business.	Policy and Procedure Document	01-Jan-27	Low
Freedom of Association and Collective Bargaining (COP 19) • Right to organize and participate in collective bargaining	5	The Member respects the right to associate freely and participate in collective bargaining in accordance with the Code of Practices.	Check your responses in the RJC Assessment Workbook (your Self Assessment). Consider whether employees can join or form a trade union of their choice and engage in good faith negotiations if they wish. Consider ways to engage in dialogue with your employees, for example through regular meetings with employee representatives. See the Freedom of Association and Collective Bargaining Standards Guidance chapter for more information.	Broadly managed	Please document the processes and controls used to support this response. No further action is required unless there is a change to the business.	Policy and Procedure Document Works Committee Minutes	01-Jan-27	Low
Non-Discrimination (COP 20) • Right to non-discrimination • Right to equal pay for equal work • Right to family life • Right to hold opinions • Freedom of information and expression	6	The Member upholds principles of non-discrimination in accordance with the Code of Practices.	Check your responses in the RJC Assessment Workbook (your Self Assessment). Consider risk re recruitment processes, remuneration and promotions, family leave arrangements, workplace culture, controls against harassment and bullying, training in non-discriminatory practices for sales staff and product advertising. See the Non-Discrimination Standards Guidance chapter for more information.	Broadly managed	Please document the processes and controls used to support this response. No further action is required unless there is a change to the business.	Policy and Procedure Document Training logs	01-Jan-27	Low
Business-specific risks	7	The business has a means to identify and manage other human rights risks, if any, arising through its own activities.	Businesses may have specific or higher risks of adverse human rights impacts due to their location, activities, or working environment. Changes to the business may also trigger exposure to new human rights risks. Having a means to regularly consider other business-specific or emerging risks will help to integrate human rights considerations into day-to-day operations. This can form part of management meetings, decision-making activities, and prioritisation of actions to mitigate these risks. Examples: higher risks might be associated with: - Use of migrant labour - Working with hazardous substances - Culture of long working hours - Inadequate fire safety	Broadly managed	Please document the processes and controls used to support this response. No further action is required unless there is a change to the business.	Policy and Procedure Document Training logs Risk Register	01-Jan-27	Low
Use the toolkit to review human rights risks with business partners and in challenging situations.								
Business Partners (COP 5)	8	The business expects respect for human rights from its significant Business Partners.	This can be communicated by the business' own policy to respect human rights, which can be shared with business partners. Depending on the risks and the relationship, it may also be possible to make reference to possible risks in your contracts or supplier agreements. In some cases, the business may decide that auditing or monitoring performance may be relevant, and this could factor into decisions on future business relationships.	Broadly managed	Please document the processes and controls used to support this response. No further action is required unless there is a change to the business.	Company Policy on Business Partners Best Endeavours	01-Jan-27	Low

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Business Partners (COP 5) • Right to a safe and healthy work environment • Right to rest and leisure	9	If orders are placed to suppliers with very tight deadlines, the business has considered potential human rights risks.	<i>Purchasing practices can be a significant risk factor for adverse human rights impacts. For example, changing product or service requirements for suppliers at the eleventh hour, without adjusting production deadlines and prices, may push suppliers to breach labour standards in order to deliver. In such situations, businesses have been accused of contributing to adverse human rights impacts through their direct business relationships.</i> <i>Consider how to plan sales and orders to avoid, to the extent possible, very tight deadlines with suppliers. Consider and discuss with suppliers the working conditions of their employees when trying to meet tight deadlines. Approaches to preventing or mitigating human rights risks from these situations could then be developed.</i>	Broadly managed	Please document the processes and controls used to support this response. No further action is required unless there is a change to the business.	Policy on Business Partners	01-Jan-27	Low
Business Partners (COP 5)	10	The business knows how it will respond in the event that it becomes aware that a Business Partner is not respecting human rights.	<i>This could be formally documented in a policy or procedure, or for smaller businesses it could simply be that management would meet to work out its response depending on the issue.</i> <i>Think about how existing systems and practices can be used, so that management of human rights is integrated into these wherever possible. This toolkit can help identify areas of potential human rights risk that may need your action to prevent or mitigate the risks.</i>	Broadly managed	Please document the processes and controls used to support this response. No further action is required unless there is a change to the business.	Policy and Procedure on Business Partners	01-Jan-27	Low
Conflict-Affected Areas (COP 6.2) • Right to life, liberty and security of the person • Freedom from torture or cruel, inhuman or degrading treatment • Right to non-discrimination • Right to self-determination • Humanitarian law	11	If operating or planning to operate in a conflict-affected area, the business has formally assessed the heightened human rights risks.	<i>Conflict-affected areas automatically raise a 'red flag' for risk of major human rights abuses. Gold, diamond and platinum group metals related operations can all be found in conflict-affected areas. If operating in such areas, it essential to understand and assess these risks.</i> <i>This is best carried out with a risk assessment, or similar, to formally document your findings. The risk assessment can be stand-alone or integrated in other assessments. The RJC Risk Assessment Toolkit offers one structure for documenting the assessment, but Members are free to use their own approach. See the Conflict-Affected Areas Standards Guidance chapter for some approaches and references that can be used.</i> <i>When carrying out the assessment, it may be helpful to consider some of the following questions:</i> • Are we operating in a context where domestic law related to human rights is weak, unenforced or in-existent? Does our due diligence assess these factors and their implications for human rights risks? • Is it clear to all personnel and to those with whom we have business relationships in those contexts that we work to the standard of respect for all internationally recognized human rights? Do they understand what that entails? • Are we operating in a context where there are conflicting requirements between domestic law and	Not Applicable	Please document the reason for the Not Applicable Response.	Policy Document	01-Jan-27	Not Applicable
Conflict-Affected Areas (COP 6.2) • Right to life, liberty and security of the person • Freedom from torture or cruel, inhuman or degrading treatment • Right to non-discrimination • Right to self-determination • Humanitarian law	12	If sourcing diamonds, gold or platinum group metals directly from conflicted affected areas, the business has formally assessed the heightened human rights risks.	<i>Assessing the heightened risks of major human rights abuses through suppliers can be complex. Access to up-to-date local information, finding ways to work with business partners on these issues, and decision-making in complex circumstances can be very challenging.</i> <i>It can be helpful to seek advice from credible external sources, including civil society organizations working in or reporting from the area. Where appropriate, consider seeking advice from Governments, including that of the home State. National human rights institutions can also be a valuable source of advice, as can industry bodies or multi-stakeholder initiatives.</i> <i>A risk assessment, or similar, should be used to document your findings about direct suppliers and potential risks in conflict-affected areas. The risk assessment could be stand-alone or integrated in other Code of Practices assessments, for example Business Partners. The RJC Risk Assessment Toolkit offers one structure for documenting the assessment, but Members are free to use their own approach. See the Conflict-Affected Areas Standards Guidance chapter for some approaches that can be used.</i>	Not Applicable	Please document the reason for the Not Applicable Response.	Policy Document	01-Jan-27	Not Applicable

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Conflict-Affected Areas (COP 6.2) • Right to life, liberty and security of the person • Freedom from torture or cruel, inhuman or degrading treatment • Right to non-discrimination • Right to self-determination • Humanitarian law	13	If operating or planning to operate in, or sourcing diamonds, gold or platinum group metals directly from, a conflict-affected area the business has put in place systems to prevent or mitigate the identified risks.	<i>Wherever possible, integrate steps to address the identified risks with implementation of other COP provisions.</i> • Consider heightened risks of bribery and corruption in conflict-affected areas, and regularly review implementation of the policies and procedures developed under Bribery and Facilitation Payments. • Consider heightened risks associated with use of security forces. Members with Mining Facilities are required to conduct security risk assessments and ensure that security personnel receive training and operate in accordance with the Voluntary Principles on Security and Human Rights, under Security. • Consider how to promote responsible business practices to significant Business Partners. For high-risk situations such as conflict-affected areas, consider inserting a clause in all contractual agreements with suppliers indicating that they are expected to respect human rights in all areas of operation. In some situations, requirements for human rights/social compliance monitoring may be relevant. • Members operating in, or sourcing from, a conflict-affected area should publicly report on their supply chain due diligence policies and practices. This may be incorporated with Reporting.	Not Applicable	Please document the reason for the Not Applicable Response.	Policy Document	01-Jan-27	Not Applicable
Sourcing from Artisanal and Small-Scale Mining (ASM) (COP 7) • Right to a safe and healthy work environment • Right to physical and mental health • Right to life, liberty and security of the person • Abolition of child labour • Right to education • Abolition of forced labour	14	If sourcing diamonds, gold or platinum group metals directly from ASM, the business checks that the ASM: • has controls to prevent the use of forced labour and worst forms of child labour • has work place health & safety practices which protect the wellbeing of its employees and contractors • uses mercury in a controlled, safe and environmentally acceptable manner • controls for other significant environmental impacts	<i>If the ASM suppliers are located within the area of operation of a Member with mining facilities, the Member should identify risks, and conduct efforts to reduce or avoid risks, as an integral part of its community engagement program and impact assessments and risk mitigation planning.</i> <i>If the ASM suppliers are located in a different area from the Member, the Member could assess risks from in-house and/or use professionals with local experience. Site visits will be needed to assess these human rights risks and work out ways to improve practices where required. See the Sourcing from ASM Standards Guidance chapter for more information.</i>	Not Applicable	Please document the reason for the Not Applicable Response.	Policy Document	01-Jan-27	Not Applicable
Sourcing from Artisanal and Small-Scale Mining (ASM) (COP 7) • Right to a safe and healthy work environment • Right to physical and mental health • Right to life, liberty and security of the person • Abolition of child labour • Right to education • Abolition of forced labour	15	If sourcing diamonds, gold or platinum group metals directly from ASM, the business collaborates and use best endeavours to support the ASM improve its practices in relation to human rights, health & safety and environmental performance.	<i>Approaches to monitoring and remediating the identified risks could include:</i> • Monitoring of site conditions and practices, potentially via site visits by the Member or its representatives. • Training and other forms of technical assistance and advice to improve working conditions and reduce impacts, particularly with respect to the use of mercury, environmental management, and health and safety. • Capacity-building measures, such as support for community health and educational projects, and community education on forced and child labour issues. • Financial incentives, where appropriate, to encourage and facilitate improvements to site conditions and practices. <i>See the Sourcing from ASM Standards Guidance</i>	Not Applicable	Please document the reason for the Not Applicable Response.	Policy Document	01-Jan-27	Not Applicable
Security (COP 11) • Right to privacy • Right to life, liberty and security of the person • Freedom from degrading treatment • Right of peaceful assembly • Right to non-discrimination	16	If the Member uses security service providers, respect for human rights is expected and supported in accordance with the Code of Practices.	<i>Check your responses in the RJC Assessment Workbook (your Self Assessment). Consider how you make human rights expectations clear to service rights providers, whether they carry out internal training on appropriate use of force, non-discrimination and privacy issues if carrying out surveillance or physical searches. See the Security Standards Guidance chapter for more information.</i>	Not Applicable	Please document the reason for the Not Applicable Response.	Policy and Procedure Documents Human Rights Training for Security Personnel	01-Jan-27	Not Applicable

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Supply chain-specific risks	17	The business has a means to identify and manage other human rights risks, if any, directly linked to business' operations, products or services by business relationships.	<i>Some parts of the supply chain may have specific or higher risks of adverse human rights impacts due to their location, activities, or working environment. New business partners may also trigger exposure to new human rights risks. Having a means to regularly consider other business-specific or emerging risks will help to integrate human rights considerations into day-to-day operations. This can form part of management meetings, decision-making activities, and prioritisation of actions to mitigate these risks.</i> <i>Examples: higher risks might be associated with:</i> - Use of migrant labour - Working with hazardous substances - Culture of long working hours - Inadequate fire safety	Broadly managed	Please document the processes and controls used to support this response. No further action is required unless there is a change to the business.	Policy Document on Human Rights, Child Labour, Forced Labour, Business Partners and Legal Compliance Company's Policy Statement on Suppliers' Contractual Obligations, Supply Chain Management, Sourcing from Conflict Affected and High Risk Areas and Best Endeavours.	01-Jan-27	Low
Consider how well human rights considerations have been integrated in business systems.								
Legal Compliance (COP 1)	18	Systems for awareness and compliance with Applicable Law include coverage of human rights areas in this Toolkit.	<i>While the international human rights framework is important to be aware of, most relevant human rights principles for businesses are enshrined in the national law of most countries.</i> <i>Some human rights impacts are illegal actions. In those cases, the business in question might face legal consequences, and compliance with the law could probably have avoided the negative impact. In other cases, human rights risks may be 'grey zones' where it is not clear whether the action is against the law or not.</i>	Broadly managed	Please document the processes and controls used to support this response. No further action is required unless there is a change to the business.	Policy Document on Human Rights and Legal Compliance	01-Jan-27	Low
Policy and Implementation (COP 2)	19	Senior management's review of the ongoing suitability and adequacy of the Member's business practices includes consideration of human rights risks.	<i>The COP requires an at least annual review of the Member's business practices to look for opportunities for improvement. Use this Toolkit as a baseline for raising any relevant human rights risks, and consider how well they're being managed.</i>	Broadly managed	Please document the processes and controls used to support this response. No further action is required unless there is a change to the business.	Risk Assessment Human Rights Due diligence assessment	01-Jan-27	Low
Reporting (COP 3)	20	Communication to stakeholders includes reference to your general approach to addressing human rights risks.	<i>Communicating about your general approach is an important part of how you manage human rights risks. However it is not expected that a business should reveal publicly all the issues identified in its due diligence, or the steps it takes to mitigate every risk identified.</i> <i>The form and content of communication about human rights should be tailored to the audience. Work out how you will communicate what you do to potentially or actually affected individuals. Your communication can either be informal and included in regular meetings and discussions with employees, suppliers, customers or community representatives, or it can take the form of formal, publicly available</i>	Broadly managed	Please document the processes and controls used to support this response. No further action is required unless there is a change to the business.	Company Best endeavours, Policy and procedure document on Human Rights Policy and procedure document on Reporting	01-Jan-27	Low
Grievance Mechanisms (COP 18)	21	Commitment to develop and implement effective grievance mechanisms in relation to company's own operations and at supplier levels	<i>Grievance mechanisms are an important part of a businesses' responsibilities under the UNGPs. An effective grievance mechanism provides companies with a process for systematically receiving, investigating and responding to rightsholder complaints and remediating them.</i> <i>A grievance mechanism is a channel through which people are able to communicate the fact that they feel negatively affected by your business and can seek remedy. Potential users of grievance mechanisms may be any individuals or groups whose rights could be negatively impacted by the company. For example, employees, contract workers, workers in the supply chain, artisanal miners and their families, members of the community around a business facility or site, consumers or end-users. If grievances are raised, it is important that these are investigated in an impartial manner, that findings are actioned and that feedback is provided where possible.</i>	Broadly managed	Please document the processes and controls used to support this response. No further action is required unless there is a change to the business.	Policy and Procedure Document on Grievance Mechanisms Minutes of Grievance Committee Meetings	01-Jan-27	Low

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Grievance Mechanisms (COP 18)	22	Commitment to protect complainants' personal data and to protect complainants against retaliation	Grievance mechanisms are an important part of a businesses' responsibilities under the UNGPs. An effective grievance mechanism provides companies with a process for systematically receiving, investigating and responding to rightsholder complaints and remediating them. A grievance mechanism is a channel through which people are able to communicate the fact that they feel negatively affected by your business and can seek remedy. Potential users of grievance mechanisms may be any individuals or groups whose rights could be negatively impacted by the company. For example, employees, contract workers, workers in the supply chain, artisanal miners and their families, members of the community around a business facility or site, consumers or end-users. If grievances are raised, it is important that these are investigated in an impartial manner, that findings are actioned and that feedback is provided where possible.	Broadly managed	Please document the processes and controls used to support this response. No further action is required unless there is a change to the business.	Policy and Procedure Document on Grievance Mechanisms Minutes of Grievance Committee Meetings	01-Jan-27	Low