

RJC Ethics

COLOR JEWELS INC. is a jewelry manufacturing and distribution company based in state of Rhode Island, USA. We have 1 site located in New York City, and employ approximately 30 personnel.

COLOR JEWELS INC. is a member of the Responsible Jewellery Council (RJC).

The RJC is a standards-setting organization that has been established to advance responsible ethical, human rights, social and environmental practices throughout the diamond, gold and platinum group metals jewelry supply chain.

The RJC has developed a benchmark standard for the jewelry supply chain and credible mechanisms for verifying responsible business practices through third party auditing.

As an RJC member, we commit to operating our business in accordance with the RJC Code of Practices. We commit to integrating ethical, human rights, social and environmental considerations into our day-to-day operations, business planning activities and decision making processes.

KIMBERELY PROCESS

The World Diamond Council created a System of Warranties for diamonds that has been endorsed by all KPCS participants. Under this system, COLOR JEWELS INC. includes the following affirmative statement on all invoices:

“The diamonds herein invoiced have been purchased from legitimate sources not involved in funding conflict and in compliance with United Nations resolutions. The seller hereby guarantees that these diamonds are conflict free, based on personal knowledge and/or written guarantees provided by the supplier of these diamonds.”

It is considered a violation of the KPCS to issue a warranty declaration on a sales invoice unless it can be corroborated by warranty invoices received for purchases. Each company trading in diamonds must also keep records of the warranty invoices received and the warranty invoices issued when buying or selling diamonds. This flow of warranties in and out must be audited and reconciled on an annual basis by the company's auditors.

In addition, the diamond industry organizations and their members have adopted the following principles of self-regulation:

- to trade only with companies that include warranty declarations on their invoices;
- to not buy diamonds from suspect sources or unknown suppliers, or which originate in countries that have not implemented the Kimberley Process Certification Scheme;
- to not buy diamonds from any sources that, after a legally binding due process system, have been found to have violated government regulations restricting the trade in conflict diamonds;

- to not buy diamonds in or from any region that is subject to an advisory by a governmental authority indicating that conflict diamonds are emanating from or available for sale in such region, unless diamonds have been exported from such region in compliance with the Kimberley Process Certification Scheme;
- to not knowingly buy or sell or assist others to buy or sell conflict diamonds;
- to ensure that all company employees that buy or sell diamonds within the diamond trade are well informed regarding trade resolutions and government regulations restricting the trade in conflict diamonds.

DODD FRANK ACT

In 2010, a new law was enacted, the Dodd-Frank Wall Street Reform and Consumer Protection Act. Within the Act, there is a provision regarding so-called “Conflict Minerals” (Tin, Tungsten, Tantalum and Gold) requiring U.S. based public companies to disclose measures they have taken to identify these metals within their supply chains and to demonstrate that they have not been sourced either directly or indirectly from the Democratic Republic of Congo (DCR) and adjoining nations. It is the policy of the COLOR JEWELS INC. to be compliant with the requirements of this provision of the Dodd-Frank Act and require our supply chain to assure compliance as well.

It is our policy that we do not use any metals in our products that come from conflict areas as outlined in the Dodd-Frank Act. We only partner with suppliers who are in compliance with this Act and can provide evidence of compliance.

CODE OF CONDUCT

BRIBERY

We are committed to a working and business environment free of bribery and facilitation payments that are both seen as a form of corruption.

Bribes are paid to obtain something the bribe receiver would not otherwise have provided. Bribes may take the form of cash, gifts in kind, hospitality, expenses, advantage or promises. Facilitation payments are paid to receive preferential treatment for something that the payment receiver is otherwise still required to do.

COLOR JEWELS INC. is committed to not offer, accept or countenance the payment of bribes in any form and we consider bribery risk on the general practices of our ongoing business. We encourage the reporting of incidents of attempted bribery and communicate that no employees shall suffer adverse consequences by voicing concerns or refusing to pay a bribe. COLOR JEWELS INC. currently has financial accounting instruments in place to monitor facilitation payments and other forms of potential bribery.

WHISTLEBLOWER PROTECTION

COLOR JEWELS INC. adheres to federal statutes regarding whistleblower protection stating that an employer may not discharge or otherwise retaliate against an employee because the employee has filed a complaint or exercised any rights provided to employees

COMPETITION

We are dedicated to ethical, fair and vigorous competition. We will sell COLOR JEWELS INC.'s products based on their merit, superior quality, functionality and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or gratuities in connection with the purchase of goods or services for COLOR JEWELS INC. or the sales of its products or services, nor will we engage or assist in unlawful boycotts of particular customers.

BUSINESS PARTNER EXPECTATIONS

COLOR JEWELS INC. is a company that takes its legal and social responsibilities seriously. To maintain a high standard in both regards, COLOR JEWELS INC. sets high expectations of itself in its business practices. To ensure success in meeting its legal and social duties, COLOR JEWELS INC. extends these requirements to its business partners as well. Below is an outline of these requirements to achieve COLOR JEWELS INC.'s goal of not only practicing ethical business conduct on its own but also promoting sound legally and socially responsible practices in its business partners.

LEGAL COMPLIANCE

COLOR JEWELS INC. is committed to full compliance with regulations and laws affecting its business operations, including the environment, health and safety, employment and human rights, and any other applicable areas.

DISCRIMINATION

COLOR JEWELS INC. prohibits discrimination against any employee or applicant on the basis of race, color, sex, sexual orientation, age, religion, national origin, marital status, ancestry, citizenship, veteran status, pregnancy, medical condition, physical or mental disability or any other characteristics to the extent protected by law.

LABOR, HEALTH & SAFETY

COLOR JEWELS INC. complies fully with applicable labor laws and strongly opposes child labor and forced labor of any kind. It also does not restrict or inhibit employees' rights to organize and collectively bargain. Workplace safety remains the highest priority at all times. COLOR JEWELS INC. is dedicated to upholding high standards for a safe and healthy work environment for all its employees.

GIFTS OR BRIBERY

COLOR JEWELS INC. and its employees may not engage in providing or accepting any gifts, payments, or hospitality to inhibit or influence governmental process or business activities. COLOR JEWELS INC. has a firm stance against bribery in any form.

ANTI-MONEY LAUNDERING, CONFLICT REGIONS, TERRORISM

COLOR JEWELS INC. has a written policy against money laundering and the financing of terrorism. It is also SRSP certified regarding the avoidance of using conflict minerals.

HUMAN RIGHTS

COLOR JEWELS INC. recognizes the safeguarding of human rights as a fundamental necessity in its business practices and those of its partners. It carries out regular risk assessments to ensure the protection of human rights in the totality of its operations.

The policies included on this site are in accord with the RJC Code and are endorsed by senior management. The date of the last review of these policies against the Member's internal practices was on February 9, 2021.