



## **Plumb Club Code of Responsibility**

The Plumb Club is a responsible supply side organization committed to leadership and positively impacting the Jewelry Industry.

Plumb Club members act in the utmost responsible manner and observe the highest standards of business and personal conduct, including but not limited to, Business Ethics, Sourcing, Human Rights, Social and Environmental Responsibility, and maintain Management Systems through which these practices can be validated.

Plumb Club members comply with all applicable Local, Federal, and International Laws. All members uphold and conduct themselves with the highest standards of honesty, integrity, ethics and morals, in all business practices and policies, thereby maintaining and enhancing retailer and consumer confidence in the Plumb Club and its members.

All Members are required to sign this Plumb Club Code of Responsibility annually.

### **1 Business Ethics**

#### **1.1 Commitment to our peers and customers**

Every member of The Plumb Club (TPC) is committed to operate its businesses in a manner that ensures integrity, transparency, and compliance with applicable laws. It is our commitment that members will uphold the TPC Social, Ethical and Environmental Principles.

#### **1.2 Policy against Bribery and Corruption**

Members of TPC shall prohibit bribery in all business practices and transactions carried out by the member and/or by agents acting on behalf of the member in compliance with the US Foreign Corrupt Practices Act and any other applicable laws.

#### **1.3 Anti-Money Laundering and/or financing of terrorism**

All members must comply with and maintain records under the requirements of the USA Patriot Act and US Bank Secrecy Act.

#### **1.4 Commercial Confidentiality and Data Privacy**

Members and their employees will take steps to insure commercial confidentiality and data privacy of their business partners, as well as their employees.

## **2 Responsible Sourcing**

### **2.1 Conflict-free Sourcing**

Members are committed to the responsible sourcing of every element of their products and the respect of human rights.

### **2.2 Accurate Disclosure and Legal Compliance**

Members are to fully comply with all Applicable Regulations, Guides, and Standards, including but not limited to:

- The National Gold and Silver Stamping Act
- The Federal Trade Commission (FTC) Guides for the Jewelry, Precious Metal and Pewter Industries
- The US Department of Commerce published Voluntary Product Standard
- All applicable National and Local Laws with regard to proper marketing, disclosures, markings, and representation of products supplied.

### **2.3 Gold and 3T – Dodd Frank Act Compliance**

All Members must have a verifiable process to ensure their source of precious metals are from conflict free sources which follow the conflict minerals provisions of the Dodd Frank Act .

### **2.4 Natural Mined Diamonds - Kimberley Process Conflict and World Diamond Council System of Warranties**

Members involved in buying and selling of diamonds, whether rough, polished or set in jewelry, shall adhere to the Kimberley Process Certification System and / or the World Diamond Council System of Warranties, as applicable.

### **2.5 Gemstones**

Members will meet or exceed all FTC Regulations in regards to natural, created, treated or enhanced gemstones.

### **2.6 Synthetic and Simulated Gemstones**

Members will ensure Synthetic and Lab-Grown Gemstones (including diamonds), and simulated stones, are disclosed and in conformance with all Applicable Laws.

### **2.7 Other Materials**

Members will ensure that all other materials, not covered previously are in conformance with all applicable laws.

## **3 Human Rights and Social Responsibilities**

### **3.1 Fundamental Human Rights, Non Discrimination, and stand against Corporal Punishment**

Members will at all times respect the fundamental human rights and dignity of the individual and follow the United Nations Guiding Principles on Business and Human Rights.

Members shall not practice or condone any form of discrimination in the workplace as it pertains to any local laws.

Members will not use or condone the use of corporal punishment under any circumstances and will prohibit the use of degrading treatment, harassment, abuse, coercion or intimidation in any form.

### 3.2 Child Labor and Forced Labor Laws

Members shall not engage in or support Child Labor, as defined in ILO (International Labor Organization) Convention 138 and Recommendation 146. Members are further required to comply with applicable local laws with regards to hiring of minors, whom age is as defined by local jurisdiction.

Members shall not use forced labor of any kind.

### 3.3 Compensation and all Applicable Labor Laws

Members shall comply with applicable local law on working hours, eligible overtime pay, legal holidays and leave policies, and all compensation and labor laws.

### 3.4 Health and Safety

Members will provide safe and healthy working conditions for all employees in accordance with applicable local law.

## 4 Environmental Responsibilities

All Members are required to comply with all local environmental laws and regulations.

## 5 Verification

Members must comply with requests from The Plumb Club Executive Committee or Responsible Business Practices Committee for verification that they are in compliance with all of the above sections, which may include independent, third party verification.

## 6 Member Agreement to Abide

We agree to, and confirm that, our firm is in compliance with all of the above principles and responsible business practices. We further understand and agree that non-compliance can result in sanctions, fines not to exceed \$5,000 per occurrence or expulsion from The Plumb Club at the sole discretion of the Board of Directors.

**Member (Company) Name:**

**Authorized Signer for the Member (Must be a principal or officer of the company):**

**Print Name:**

**Title:**

**Signature:**

**Date:**