NAJ CODE OF CONDUCT

1. **The Customer Charter**
2. **The Guiding Principles**
3. **Disputes Procedure**

1. The Customer Charter

This Charter sets out what customers of our members can reasonably expect. The Customer Charter will be incorporated into the annual membership certificate that will be displayed in members' business premises (shops and offices) and also on their websites. This will signify that members of the National Association of Jewellers are signatories of the Association's full Code of Conduct and acknowledge their commitment to abide by and uphold this Code.

The National Association of Jewellers Member Customer Charter: a mark of our commitment to you

This Charter sets out what you can expect of us as a member of the National Association of Jewellers.

We will:

1. Act with honesty, integrity, and professionalism.
2. Describe jewellery, watches and other goods and services for sale fully and accurately.
3. Abstain from any conduct or practice that may mislead or deceive.
4. Act responsibly and sustainably to support the NAJ's commitment to the standards of the Responsible Jewellery Council.
5. Deal with any complaints in a timely and fair manner and, in the event of dispute, clearly explain the NAJ procedure for mediation, providing the NAJ Compliance Officer's contact details to facilitate a timely resolution.
6. Co-operate fully with any enquiry to resolve any disputes and abide by the findings and decision.

It is the Association's intention that the Charter would be altered as little as possible over time as it consists of broad principles, but that the accompanying specific guidance would be updated to reflect market changes and other developments as appropriate. Members are encouraged to review the guidance notes at least annually when they renew their membership.

2. The Guiding Principles

2.1 Honesty

Code Signatories will at all times:

a) Abide by all national laws and regulations applicable to running a business in the jewellery industry.
b) Ensure that all promotional, advertising and selling material and practices comply with national legislation, codes of the Advertising Standards Authority and any jewellery industry specific codes.
c) Proactively protect their customers against any fraud, misrepresentation or unethical practices.
d) Members are advised to follow the Gold Standard Code of Best Practice when purchasing second-hand precious metal and jewellery.

10 Vyse Street
Birmingham B18 6LT
0121 237 1110
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e) Co-operate with any inquiry conducted by the NAJ to resolve disputes involving a customer, third party or another NAJ member or Code Signatory.

2.2 Integrity

Code Signatories will at all times:

a) Conduct themselves and run their businesses in such a manner as to not bring the jewellery industry into disrepute.
b) Abstain from making false or misleading statements about any member of the jewellery industry.
c) Refrain from public criticism of any NAJ member, unless all reasonable steps have been taken to resolve the relevant issues without satisfaction.
d) Provide full and accurate disclosure regarding any merchandise offered or sold (nature, quality, characteristics and origin (if known)).
e) Honour all guarantees, warranties and service policies as presented to customers as well as provided by law.
f) Implement all reasonable procedures to prevent trade in conflict diamonds, other gemstones and precious metals.
g) Be guided by any Assured Advice that the NAJ has provided.
h) Ensure all relevant items are appropriately hallmarked as required by law.
i) Make all reasonable effort to deal only with companies that do not exploit children or use child labour, provide adequate occupational health and safety conditions, and respect the environment within your own business.

2.3 Professionalism

Code Signatories will at all times:

a) Strive to improve knowledge, expertise and professionalism in themselves and their employees.
b) Ensure that they remain familiar with current market conditions and trends that influence trading conditions in the jewellery industry where they operate.
c) Be aware of and implement best practice procedures throughout the work environment.
d) Only undertake work for which they are qualified and experienced in, or have the facility to outsource to a fully qualified, experienced professional. It is recommended that any outsourcing is by prior agreement with the customer.

3. Disputes Procedure

We regret that you have reason to make a complaint to the Association. If you would like advice prior to submitting your complaint, please contact the compliance team at 0121 237 1111 or email your complaint directly to us at compliance@naj.co.uk or by post to:

The Compliance Officer
NAJ
10 Vyse Street
Hockley
Birmingham
B18 6LT

The Association will always require your complaint in writing.

The National Association of Jewellers is a trade association and professional body for companies involved in the jewellery industry: manufacturers, suppliers, designers, valuers and retailers. We promote, watch over and

advance the interests of such companies who as members are committed to our Customer Charter and Code of Conduct. In the event that all efforts by our member to resolve a complaint or dispute have been unsuccessful the Association will attempt to mediate a satisfactory outcome which may include: conciliation and adjudication by an external ADR provider, the Professional & Technical Standards Steering Group, and/or a panel appointed by the National Committee to consider the dispute on a completely impartial basis and where possible, recommend a way forward. The Association has no legal sanction; it is not a court of arbitration and has no powers to enforce a settlement. Thus, while the Association will use its best endeavours to mediate and resolve a dispute with the aim of achieving a reasonable outcome satisfactory to both parties, it cannot enforce one. It is expected that members will co-operate with the mediation process and outcome.

The service is strictly based on written correspondence only, and no verbal communication will be entered into once the service is in progress other than in exceptional circumstances. The Association does not deal with the matter of compensation.

When we first receive a complaint, we will check that it:

- Is about a subject and organisation that we can consider.
- Has gone through the right complaints process.
- Has arrived at our office within 12 months of when the issues in your complaint happened.
- Has enough detail and paperwork for us to get to work on it.

It's important to note we cannot deal with complaints that are:

- About issues that happened more than a year ago (unless there are special circumstances).
- About employment, personnel or most contractual matters.
- The subject of a court case or tribunal.
- Against non-member companies.

Who Will Hear Your Complaint?

Complaint against	Heard by	Contact via
A member company	NAJ Compliance Officer/BATF Principal Officer/NAJ Chair	complaint@naj.co.uk
A non-member company	Trading Standards	www.tradingstandards.uk
An employee of the Association, excluding the BATF Principal Officer	BATF Principal Officer	hr@batf.uk.com
BATF Principal Officer, policy and actions of the Association	NAJ Chair	chair@naj.co.uk
An NAJ volunteer (while acting in a voluntary capacity on behalf of NAJ)	NAJ President	president@naj.co.uk
The Chair and Senior Officers of the Association	NAJ President	president@naj.co.uk
The President of the NAJ	NAJ Chair	chair@naj.co.uk

Complaining about a NAJ Member

If your dispute is with a member of the Association, you can access NAJ Resolve, the independent consumer complaints service for jewellery businesses in the UK and Ireland, operated in conjunction with the Centre for Effective Dispute Resolution.

We hope that it will rarely be needed for you to make a complaint against a member of the Association, however, if you need to do so, this section explains the process to be followed.

- **Step 1: Contact the member**
  Problems between you, the consumer, and the company can arise because of misunderstandings or a breakdown in communication and can often be resolved by direct discussion with the person concerned. If a phone call to the company does not resolve the issue, please write to the NAJ member concerned setting out the problem. Keep a copy of your correspondence for future reference. You may also wish to ask for a face-to-face meeting. Make sure you find out who is the right person to speak to about complaints. Please note that your contract is between yourself and the person or business which issued the invoice/receipt and so you should approach them initially.

- **Step 2: A complaint to the Association**
  If your own efforts to resolve a grievance directly with our member have failed, then the Association may be able to investigate the matter on your behalf and will use its best efforts to resolve things. You must submit your formal complaint to the Association in writing (letter or email) setting out the details of your complaint. The points which need to be covered are shown below.

  Please note that 'hearsay' evidence is not acceptable and cannot be taken into consideration, nor will informal second opinions from any third party, whether a NAJ member or not. Make sure you have gone through Step 1 before sending anything to us.

  When submitting your formal complaint, please include copies of all correspondence which have passed between yourself and the member concerned. Your correspondence will be made available to our member and their response made available to you, the consumer.

  To submit a complaint via NAJ Resolve visit **naj.co.uk/resolve**.

- **Step 3: Second Opinion**
  If appropriate, the Association will arrange for a second opinion/professional assessment from a suitably qualified individual. A charge may be made for this service, but we will not do this without your approval.

- **Summary**
  The National Association of Jewellers does not have the authority to order a refund or part refund by the member, irrespective of the outcome of the complaint. Only a court of law has the authority to order any action or payment in connection with a complaint. Citizens Advice, Trading Standards or Consumer Direct can advise you as to your consumer rights with regard to refunds. However, a genuine effort will be made to deal with your problem and achieve a satisfactory solution. Please note that the NAJ complaints procedure may not be used as a precursor to litigation (that is, you can't use our process to take someone to court).

Most complaints can be resolved by candour and good communication between both parties.

- Communicate with the member. If this does not resolve the complaint, then:
- Put your complaint in writing to the business in question. If this does not resolve the issue, then:
- Put your complaint in writing to the Association enclosing copies of all relevant correspondence. A copy of your correspondence will be sent to the member concerned asking for their response, which will then be made available to you. All correspondence will be considered by the Investigating Officer, the BATF Principal Officer and, when appropriate, the Professional & Technical Standards Steering Group and appropriate action taken and/or recommendations made.

The Association cannot become involved in a dispute where the matter is being dealt with by the courts.

Failure to Resolve a Dispute Using Mediation

The parties may seek resolution in accordance with the laws of the United Kingdom at any time, however, to do so during the mediation process may cause the process to be suspended.

Breaches of the NAJ Code of Conduct

In the event it is determined that a member of the Association has breached the Code of Conduct, the Professional & Technical Steering Group will consider what action should be taken, which could result in a petition to the National Committee to expel or suspend the member. There is a right to appeal.

Points to be Included in a Letter of Complaint to the NAJ

- Your name and full address, daytime telephone number and email address.
- The name and address of the member you are complaining about and primary contact.
- The date on which the product or service was provided by the member in question.
- The details of your complaint.
- Confirmation that you have taken up your complaint with the member and the outcome.

Complaints about a Fellow Member

If you are a member of the Association and have a complaint about a fellow member you can also register your dispute through NAJ Resolve. Visit naj.co.uk/resolve for more information.

Complaints about the Association Itself

If you have a complaint against the Association itself, please try to speak to the person you have been dealing with, who should be able to help you to resolve the issue. If you are still unhappy, please contact the appropriate person to have your complaint investigated further (see contact table)

Remedies and Sanctions

- In the event of an NAJ member being at fault and, where appropriate, they may be asked to address issues regarding best practice including agreeing to staff training or updating their operating procedures.
- Sanctions in the event of a serious breach of the Code of Conduct by a member may include temporary or permanent suspension/termination of NAJ membership.

Complaints about a Non-Member

Unfortunately, we cannot deal with complaints against non-members.

We suggest you contact your local **Trading Standards Department** for support.

If you need help making the complaint, contact Citizen's Advice:

- England and Wales: **www.citizensadvice.org.uk** 03444 111 444 (England) /03444 77 20 20 (Wales). The dedicated consumer helpline is freephone 0808 223 1133.
- Scotland: **www.consumeradvice.scot** or 0808 164 6000.
- Northern Ireland: **www.citizensadvice.co.uk** or 0300 123 6262.
- Ireland: **www.citizensinformation.ie** or 0761 074 000.

We aim to respond to complaints within five working days and to have investigated a complaint within 20 working days.

Signature _____ **Name** _____

Date _____