

**VOLUNTARY CODE OF CONDUCT FOR  
AUTHENTICATING CANADIAN DIAMOND CLAIMS**

**CODE COMMITTEE**

**PRACTICE AND OPERATING PROCEDURES**

**Revised March, 2010**

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## **1. Canadian Diamond Code Committee (CDCC)**

### **1.1. CDCC Structure**

1.1.1. The CDCC will consist of representatives from all the segments of the diamond pipeline. The CDCC's goal is to work on the basis of consensus.

#### **1.1.2. Voting members**

1.1.2.1. The CDCC should have a minimum of 12 voting members but not more than 18 voting members. Should a vote be required, a simple majority defined as 50% of the voting members present plus one will be sufficient.

- 1.1.2.1.1. Mining
- 1.1.2.1.2. Rough diamond traders
- 1.1.2.1.3. Cutters and polishers
- 1.1.2.1.4. Polished diamond traders
- 1.1.2.1.5. Jewellery manufacturers
- 1.1.2.1.6. Trade associations
- 1.1.2.1.7. Retailers – chains
- 1.1.2.1.8. Retailers – independent
- 1.1.2.1.9. Retailers – dot-com
- 1.1.2.1.10. Consumer representative
- 1.1.2.1.11. Other diamond industry stakeholders as approved by the CDCC (consultants, bankers, etc)

#### **1.1.3. Non-voting members**

1.1.3.1. The following CDCC members are non-voting:

- 1.1.3.1.1. Associate Members
- 1.1.3.1.2. Advisors
- 1.1.3.1.3. Observers

### **1.2. Responsibilities of the CDCC**

1.2.1. The CDCC voting members are responsible for the following:

- 1.2.1.1. Administering the Code office and authentication process.
- 1.2.1.2. Creating stakeholder awareness regarding their responsibilities under the Code.
- 1.2.1.3. Provide an annual report to the Commissioner of the Competition Bureau and its stakeholders.
- 1.2.1.4. Recommend changes to the Code.
- 1.2.1.5. Promotion of the Code

### **1.3. CDCC Voting Members Selection Process**

#### **1.3.1. Executive**

1.3.1.1. The Executive is composed of three people with the support of one administrative assistant.

- 1.3.1.1.1. Chair
- 1.3.1.1.2. Secretary
- 1.3.1.1.3. Treasurer

1.3.1.2. The term of office is two years.

1.3.1.3. Every two years the positions are voted at a meeting of the CDCC as follows:

- 1.3.1.3.1. The election is advised and nominations called for by the Chair at least two weeks prior to the meeting
- 1.3.1.3.2. The Chair, Secretary and Treasurer have to have been a member of the CDCC for one year to provide continuity
- 1.3.1.3.3. At the following meeting each of the position is voted for
- 1.3.1.3.4. The vote is a simple majority open vote of the CDCC members present

#### **1.3.2. CDCC Members (Voting)**

1.3.2.1. The CDCC will attempt to have one but not more than two members to represent the interests of each of the following segments of the diamond industry:

- 1.3.2.1.1. Mining
- 1.3.2.1.2. Rough diamond traders
- 1.3.2.1.3. Cutters and polishers
- 1.3.2.1.4. Polished diamond traders
- 1.3.2.1.5. Jewellery manufacturers
- 1.3.2.1.6. Trade associations
- 1.3.2.1.7. Retailers – chains
- 1.3.2.1.8. Retailers – independent
- 1.3.2.1.9. Retailers – dot-com
- 1.3.2.1.10. Consumer representative
- 1.3.2.1.11. Other diamond industry stakeholders as approved by the CDCC (consultants, bankers, etc)

1.3.2.2. The term of office of voting members is four years. Each with a maximum of three consecutive terms. Each member's term of office shall

commence as of the date of the CDCC annual face to face meeting where such members are elected and continue for a period of four years. Any member wishing to withdraw or resign from the CDCC prior to expiry of his/her elected term may do so upon notice in writing (including email) to the Chair. If through resignation, removal or other causes the size of the CDCC is reduced to less than twelve (12) members, excluding any non-voting members, the CDCC shall, by a majority vote, appoint sufficient members to return the CDCC to a minimum of twelve (12) members. The term of such appointment shall end at the next annual face to face meeting of the CDCC

1.3.2.3. When a segment has no representative, all signatories from that segment are invited to volunteer to represent their segment. The CDCC will advise those signatories about the vote six weeks prior to the vote. All submissions must be made three weeks prior to the annual face to face meeting. Volunteers must meet the following criteria:

- 1.3.2.3.1. Be a signatory in good standing.
- 1.3.2.3.2. Have access to the Internet and email.
- 1.3.2.3.3. Be willing to provide their time and effort at no cost.
- 1.3.2.3.4. Be willing to attend a face-to-face meeting once a year normally held in Ottawa or Toronto.
- 1.3.2.3.5. Participate in a minimum of 50% of CDCC meetings.
- 1.3.2.3.6. Respect the confidentiality agreement signed upon joining the CDCC.
- 1.3.2.3.7. Declare any conflict of interest that may arise at any time.
- 1.3.2.3.8. Familiarize themselves with the Code and any issues surrounding the Code.
- 1.3.2.3.9. Seek prior approval of the Chair for any public or media representation of the Code or CDCC.

1.3.2.4. The vote is a simple majority open vote of the CDCC members present.

### **1.3.3. Withdrawal or Removal from the CDCC**

- 1.3.3.1. A voting member of the CDCC can resign his position in which case a call for a volunteer to replace the departing member will take place as detailed above.
- 1.3.3.2. A voting member who stops being a Code signatory will automatically be removed from the CDCC. A call for a volunteer to replace the departing member will take place as detailed above.
- 1.3.3.3. A voting member of the CDCC could be removed from the CDCC if the member does not meet the CDCC membership criteria, acts in conflict

with the Code or is disruptive to the work of the CDCC. The procedure follows:

- 1.3.3.3.1. A motion is made by one member
  - 1.3.3.3.2. The motion must be seconded
  - 1.3.3.3.3. An open vote takes place at any of the meetings
  - 1.3.3.3.4. A simple majority of the members present is required
  - 1.3.3.3.5. The CDCC member is advised by a letter sent by the Chair
- 1.3.3.4. Following the decision to remove, a call for a volunteer to replace the departing member will take place as detailed above.

#### **1.3.4. Suspension from the CDCC**

- 1.3.4.1. A member of the CDCC charged with a criminal offence will be suspended from the CDCC pending the decision of the court.

#### **1.3.5. Associate Members (Non-voting)**

- 1.3.5.1. Associate Code Members are defined as gemmological laboratory stakeholders who have paid their dues and are in compliance with minimum requirements of the Code. This Associate Member stakeholder sector may have at least one non-voting representative sit on the CDCC as an advisor as approved by the CDCC.

#### **1.3.6. Advisory members (non-voting)**

- 1.3.6.1. Advisory members are appointed at the grace of the supportive Ministry. The CDCC Executive will endeavour to have a representative from the following departments:
  - 1.3.6.1.1. Industry Canada (Competition Bureau)
  - 1.3.6.1.2. Natural Resources Canada
  - 1.3.6.1.3. Others as required

#### **1.3.7. Observer members (non-voting)**

- 1.3.7.1. The CDCC, at its discretion, can allow a representative of a stakeholder group to attend CDCC meetings as observers.

#### **1.3.8. Roles and Responsibilities of CDCC individual members**

- 1.3.8.1. **The Chair will:**
  - 1.3.8.1.1. Chair all meetings of the Board.

- 1.3.8.1.2. Be the "voice" of the organization.
- 1.3.8.1.3. With the advice of the Treasurer, be responsible for the financial management of the Code office.
- 1.3.8.1.4. With the advice of the Executive be responsible for the day to day administrative running of the Code and the Code office.
- 1.3.8.1.5. Be the media spokesperson of the Code.

**1.3.8.2. The Treasurer will:**

- 1.3.8.2.1. Monitor Code expenditures in line with the approved budget.
- 1.3.8.2.2. Maintain along with the Code office administrator the books, records and accounts of the CDCC.
- 1.3.8.2.3. Work with the Chair on budget proposals.

**1.3.8.3. The Secretary will:**

- 1.3.8.3.1. Maintain along with the Code office administrator the minutes of all meetings.

**1.3.8.4. Code Office Administrator will:**

- 1.3.8.4.1. Maintain the books, records and accounts of the CDCC and prepare monthly financial statements.
- 1.3.8.4.2. Sort and distribute mail, email, etc. and update the website as necessary.
- 1.3.8.4.3. Maintain the Signatory Registry.
- 1.3.8.4.4. Ensure records of the CDCC are kept in an orderly fashion.
- 1.3.8.4.5. Carry out authentication requests with supporting documentation.
- 1.3.8.4.6. Provide general administration for CDCC.
- 1.3.8.4.7. Provide consumers and trade with additional information.

**1.3.8.5. Individual CDCC Members**

- 1.3.8.5.1. All members are required to participate in a minimum of 50% of CDCC meetings/conference calls.
- 1.3.8.5.2. All members are required to respect the confidentiality agreement signed upon joining the CDCC.
- 1.3.8.5.3. All members are required to declare any conflict of interest that may arise at any time.
- 1.3.8.5.4. All members are expected to familiarize themselves with the Code and any issues surrounding the Code.
- 1.3.8.5.5. Any public or media representation of the Code or CDCC by an individual member shall be with prior approval of the Chair.

### **1.3.8.6. Code Office Administration**

- 1.3.8.6.1. The administration of the Code office will be overseen by Jewellers Vigilance Canada (JVC).

### **1.3.9. Meetings**

- 1.3.9.1. The CDCC will meet on a quarterly basis with at least one face to face meeting per calendar year. The other meetings may be by conference call.
- 1.3.9.2. Additional meetings may be called on the recommendation of the Executive.
- 1.3.9.3. The CDCC will conduct an annual meeting to review the past year, make necessary amendments to the Code and make a formal report to the Commissioner of the Competition Bureau.
- 1.3.9.4. The Chair may appoint a member in good standing to act as Chair.

## **2. Financial Reporting**

### **2.1. Monthly Financial Reports**

- 2.1.1. Monthly financial reports will be prepared by the Code office under the guidance of the treasurer. They will be distributed quarterly to the CDCC.

### **2.2. Annual Financial Review and Report**

- 2.2.1. The Code annual financial review will be included in Jewellers Vigilance Canada's (JVC) financial review year ending December 31st.
- 2.2.2. A separate financial report will be submitted by the auditors and forwarded to the CDCC.

### **2.3. Signing Authorities**

- 2.3.1. Along with the Chair, Secretary and Treasurer, the CDCC appoints other signing authorities from the CDCC and the administration office.
- 2.3.2. Two of these authorities must sign all cheques.
- 2.3.3. Any purchase over \$1000.00 must be approved by the entire CDCC.

## **3. Report to the Commissioner of the Competition Bureau**

- 3.1. The report to the Commissioner of the Competition Bureau will be prepared in conjunction with the annual CDCC meeting.
- 3.2. The report should include:
  - 3.2.1. A summary of activities including inquiries, industry awareness and administration of the database, website and voice mail system;

- 3.2.2. The number of Code Signatories;
- 3.2.3. The number of authentications and results;
- 3.2.4. The distribution of Code and consumer brochures;
- 3.2.5. The types of general inquiries from consumers;
- 3.2.6. The types of general inquiries from stakeholders including any meetings where stakeholders are invited;
- 3.2.7. The number of consumer complaints;
- 3.2.8. The number of trade complaints;
- 3.2.9. The ongoing issues; and,
- 3.2.10. The recommendations of changes to the Code.

#### **4. Code Signatory Registry**

- 4.1. Code Signatories agreed to be bound by the minimum requirements outlined in the Code.
- 4.2. The Registry of Code Signatories will be maintained in the Code office.
- 4.3. Code Signatories may choose whether or not to be posted on the Registry on the Code website at [www.canadiandiamondcodeofconduct.ca](http://www.canadiandiamondcodeofconduct.ca).

#### **5. Trade Complaint Procedure**

##### **5.1. Acceptance of Complaints by the CDCC**

- 5.1.1. All complaints to the CDCC must be received in writing, either by letter or email.
- 5.1.2. The identity of the Complainant is kept confidential.
- 5.1.3. The complaint (in writing) must contain the following information:
  - 5.1.3.1. The nature of the complaint;
  - 5.1.3.2. Supporting documentation/evidence of non-compliance with the Code;
  - 5.1.3.3. Full name and address of the Signatory in question;
  - 5.1.3.4. Full name, address, telephone number and email address of the Complainant, including the contact name.
- 5.1.4. The CDCC will review the received written complaint and assess whether it appears to violate the Code.
- 5.1.5. If the complaint appears to violate the Code, the CDCC will open a file and proceed as per 5.2.
- 5.1.6. If the complaint appears not to violate the Code, the CDCC, in writing, will inform the Complainant of their assessment of the complaint.
- 5.1.7. If the Complainant wishes to provide further substantiating evidence of the complaint, the CDCC will re-assess the complaint upon receipt of such new information in writing.
- 5.1.8. If upon receipt of new information the CDCC assesses the complaint as valid it will proceed as per 5.2.

- 5.1.9. If upon receipt of new information the CDCC assesses the complaint as not sufficiently substantiated, the Complainant will be informed in writing of the reasons for the CDCC's decision.

## **5.2. Procedure for Accepted Complaints**

- 5.2.1. Once a file has been opened, the CDCC will inform the Signatory in question in writing that a complaint has been made to the CDCC. The letter will include the nature of the complaint.
- 5.2.2. In the letter the CDCC will request an explanation or evidence to the contrary showing compliance with the Code. The letter will be sent Priority Courier/Registered mail.
- 5.2.3. The Signatory will be given three weeks (15 business days) to respond. This response must also be written.
- 5.2.4. The signatory will be warned in the letter that if a written response is not received within 15 business days, he or she will be removed from the Code Registry and a formal complaint may be filed with the Competition Bureau.
- 5.2.5. All subsequent pertinent information, including phone calls and emails, will be documented and put in the file.
- 5.2.6. If a written response has not been received within 15 business days the CDCC will remove the Signatory in question from the Code Registry and from the Code web site and may file a formal complaint with the Competition Bureau. The CDCC will send a letter to the Code Signatory requesting that they remove all Code marketing and point of sale material from their premises and return it to the CDCC.
- 5.2.7. Upon receipt of a response from the Signatory in question, the CDCC will assess the information provided and either, inform the Signatory in writing the file has been closed or, that their submission is insufficient to show compliance with the Code and seek further corrective measure(s). All letters will be sent Priority Courier.
- 5.2.8. If the initial Signatory's submission was insufficient and the Signatory has provided further evidence of compliance, the CDCC will evaluate the additional information provided it is received within 15 business days of the date on the letter from the CDCC.
- 5.2.9. Upon written receipt of additional evidence, the CDCC will assess the compliance to the Code and either inform the Signatory, in writing, the file has been closed or that the evidence is insufficient and that therefore they have been suspended from the Code Registry and a formal complaint may be laid by the CDCC with the Competition Bureau.
- 5.2.10. If other Signatories or consumers inquire regarding the status of the Signatory in question during the investigation, the Code office will inform them that this Signatory is under investigation.
- 5.2.11. Following the investigation, if other Signatories or consumers inquire regarding the status of the Signatory, the Code office will inform them of the Signatory's status.
- 5.2.12. The Complainant will be informed in writing of the outcome of their complaint.

### **5.3. Corrective Action**

- 5.3.1. If the Signatory in question is found in non-compliance, and therefore suspended from the Code Registry, they may reapply to the CDCC in writing showing their non-compliance was not deliberate and demonstrating the corrective action they have taken to rectify the situation and prevent its re-occurrence.

## **6. Consumer Complaint Procedure**

### **6.1. Acceptance of complaints by the CDCC**

- 6.1.1. All complaints to the CDCC must be received in writing, either by letter or email.
- 6.1.2. The complaint (in writing) must contain the following information:
  - 6.1.2.1. the nature of the complaint;
  - 6.1.2.2. supporting documentation/evidence of non-compliance with the Code;
  - 6.1.2.3. full name and address of the Signatory in question;
  - 6.1.2.4. full name, address, telephone number and email address of the consumer.
- 6.1.3. The CDCC will review the received written complaint and assess whether it appears to violate the Code.
- 6.1.4. If the complaint appears to violate the Code, the CDCC will open a file and proceed as per 6.2.
- 6.1.5. If the complaint appears not to violate the Code, the CDCC, in writing, will inform the consumer of their assessment of the complaint.
- 6.1.6. If the consumer wishes to provide further substantiating evidence of the complaint, the CDCC will re-assess the complaint upon receipt of such new information in writing.
- 6.1.7. If upon receipt of new information the CDCC assesses the complaint as valid it will proceed as per 6.2.
- 6.1.8. If upon receipt of new information the CDCC assesses the complaint as not sufficiently substantiated, the consumer will be informed in writing of the reasons for the CDCC's decision.

### **6.2. Procedure for Accepted Complaints**

- 6.2.1. Once a file has been opened, the CDCC will notify the Signatory in question in writing that a complaint has been made to the CDCC. The letter will include a summary of the consumer's complaint.
- 6.2.2. The CDCC will also acknowledge the consumer complaint in writing and copy the consumer on all correspondence to the Signatory.
- 6.2.3. In the letter the CDCC will request an explanation or evidence to the contrary showing compliance with the Code. The letter will be sent Priority Courier/Registered mail.
- 6.2.4. The Signatory will be given three weeks (15 business days) to respond.

- 6.2.5. This response must also be written. The signatory will be warned in the letter that if a written response is not received within 15 business days, he or she will be removed from the Code Registry and a formal complaint may be filed with the Competition Bureau.
- 6.2.6. All subsequent pertinent information, including phone calls and emails, will be documented and put in the file.
- 6.2.7. If a written response has not been received within 15 business days the CDCC will remove the Signatory in question from the Code Registry and from the Code web site and may file a formal complaint with the Competition Bureau.
- 6.2.8. Upon receipt of a response from the Signatory in question, the CDCC will assess the information provided and either, inform the Signatory in writing the file has been closed or, that their submission is insufficient to show compliance with the Code and seek further corrective measure(s). All letters will be sent Priority Courier.
- 6.2.9. If the initial Signatory's submission was insufficient and the Signatory has provided further evidence of compliance, the CDCC will evaluate the additional information provided it is received within 15 business days of the date on the letter from the CDCC.
- 6.2.10. Upon written receipt of additional evidence, the CDCC will assess the compliance to the Code and either inform the Signatory, in writing, the file has been closed or that the evidence is insufficient therefore they have been suspended from the Code Registry and a formal complaint may be laid by the CDCC with the Competition Bureau. The CDCC will send a letter to the Code Signatory requesting that they remove all Code marketing and point of sale material from their premises and return it to the CDCC.
- 6.2.11. If other Signatories or consumers inquire regarding the status of the Signatory in question during the investigation, the Code office will inform them that this Signatory is under investigation.
- 6.2.12. Following the investigation, if other Signatories or consumers inquire regarding the status of the Signatory, the Code office will inform them of the Signatory's status.
- 6.2.13. The consumer will be informed in writing of the outcome of their complaint.

### **6.3. Corrective Action**

- 6.3.1. If the Signatory in question is found in non-compliance, and therefore suspended from the Code Registry, they may reapply to the CDCC in writing showing their non-compliance was not deliberate and demonstrating the corrective action they have taken to rectify the situation and prevent its re-occurrence.

## **7. Canadian Diamond Authentication Process**

### **7.1. Information Required**

- 7.1.1. A person may request an authentication of a Canadian Diamond claim by calling the toll-free Canadian Diamond Authentication hotline number.

7.1.2. The person must provide the following:

- 7.1.2.1. the Diamond Identification Number (DIN);
- 7.1.2.2. if available, the name and address of the retailer where the diamond/jewellery was purchased, the retailer's invoice number and the date of the invoice;
- 7.1.2.3. the polished diamond description;
- 7.1.2.4. the name and contact details of the person requesting authentication, and payment of a cost-recovery fee.

## **7.2. Cost-recovery for Request**

7.2.1. A cost-recovery fee for this authentication process will be payable by the person making the request.

## **7.3. Time Limit for Making a Request**

7.3.1. A request for authentication should be made within five years of purchasing the diamond.

## **7.4. Request Response Time**

7.4.1. A person making the request should receive an answer to his/her request within thirty days. If not, a letter must be sent to the requesting person advising him/her of the extension.

## **7.5. Failure to Authenticate a Canadian Diamond Representation**

7.5.1. If an authentication request cannot be fulfilled because the origin of the diamond(s) cannot be traced to a Canadian mine, the CDCC may refer the matter to the Competition Bureau.

## **7.6. General**

7.6.1. There are a number of parties involved between the retailer of jewellery containing diamonds and the mines where the diamonds came from. The number of parties will vary depending on the nature of those parties. Some companies buy directly from mines, cut and polish the diamonds and set them into their own lines of jewellery. Others deal through a number of brokers and/or distributors.

7.6.2. Although it is impossible to describe in exact detail the route followed by diamonds, the following list illustrates the many possible steps involved:

- 7.6.2.1. a mine produces the rough diamonds;
- 7.6.2.2. the rough diamonds are sold to core customers through a marketing agent;
- 7.6.2.3. the core customers sell to rough diamonds brokers and manufacturers;

- 7.6.2.4. the brokers sell rough diamonds to manufacturers;
  - 7.6.2.5. the manufacturers sell polished diamonds to polished diamonds brokers;
  - 7.6.2.6. the polished diamond brokers sell to jewellery manufacturers;
  - 7.6.2.7. the jewellery manufacturers sell to international distributors of jewellery;
  - 7.6.2.8. the international distributors sell to regional distributors;
  - 7.6.2.9. the regional distributors sell to retailers;
  - 7.6.2.10. retailers sell to customers.
- 7.6.3. Additional steps could be involved if the diamonds are sent to be cleaned by a specialist, cut, partly polished, laser engraved, etc. In tracing the paper trail of a particular piece of jewellery, the CDCC will need to exercise common sense to ensure an unbroken trail back to the mine of origin.

## 7.7. Typical Steps

- 7.7.1. Each authentication request will receive a file number assigned by the Code office in which a paper trail will be kept of all steps in the authentication process.
- 7.7.2. The following describes the typical steps that would be followed to authenticate Canadian diamond claims:
- 7.7.2.1. Step 1. The consumer contacts the CDCC by utilizing the 1-800 number.
  - 7.7.2.2. Step 2. The consumer is asked to provide the description of all laser markings and the four C's supplied by the retailer. This includes the carat weight, colour, clarity, and any proportion information (cutting grade), as well as the shape of the diamond. The description must delineate which diamond grading system (GIA, AGS, HRD) was used. The detail of the retailer's dated and numbered invoice to the consumer should also be provided if available.
  - 7.7.2.3. Step 3. The CDCC contacts the retailer to determine the source of the piece of jewellery or diamond. The CDCC contacts the source of the jewellery or diamond to confirm that indeed the piece in question was sold to the retailer and that it meets the minimum standard of the Code. The source of jewellery is asked to provide his source of the jewellery or diamond.
  - 7.7.2.4. Step 4. The CDCC contacts the participant that has pre-registered the associated laser-marking scheme. The Code participant confirms the diamond description, and provides to the CDCC the name of the cutter/polisher that cut and polished the diamond, the production number assigned to the diamond, the invoice number of the cutter/polisher and the date of purchase. The Code participant (if not a retail merchant who has registered a trademark with CDCC) also provides the CDCC with the details of the merchant who purchased that diamond.

- 7.7.2.5. Step 5. The CDCC contacts the cutter and polisher (manufacturer) providing either the laser markings from step number 2 and/or the production number from step number 4. The four C's acquired from the Consumer are withheld. The Manufacturer provides the CDCC with the four C's supplied to the retailer, which confirms the stone. For the purposes of this step of the process, 'cut' would refer to shape of the cut and polished diamond. The Manufacturer provides additional information as follows: who they purchased the rough from, the parcel description, the invoice number and date of purchase and the unique parcel number from which the rough diamond crystal came.
- 7.7.2.6. Step. 6 The CDCC contacts the Marketing Facility confirming the unique parcel number for the rough diamond, the invoice number and date of sale of the rough diamond and the name of the purchasing client. The Marketing Facility also provides the CDCC with the mining company's official shipment documentation information.
- 7.7.2.7. Step 7. The CDCC contacts the Mining Operator and confirms the official documentation information from step number 6, the date of sale and name of the purchasing client.
- 7.7.2.8. Step 8. The CDCC will confirm or not confirm by letter to the consumer or the laboratory the authentication request.

NOTE: There will be instances when the Marketing Agent and the Producer are one and the same or when the Cutter and Polisher and the laser marking registrant are one and the same. The information being acquired and confirmed will be the same although fewer contacts will be required. It is anticipated that most authentications will determine that the Code is being followed and therefore should often only require the main steps outlined above.