



E6 values in action



Our Code of Conduct

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A message from our Chairman and CEO

Dear colleagues,

Today's business world is changing with increasing speed and at Element Six, along with all companies, we face ever-greater demands and expectations from many different stakeholders. In our own business we can be scrutinised by our customers, our competitors, those in the countries in which we operate and by the international community, and we are also judged against best practice.

Therefore committing to high standards of business conduct and being able to demonstrate proper compliance with these standards throughout the organisation is hugely important. It helps to protect each other, our own business reputation, and also that of the De Beers Group.



A Single Point of Reference

Our Code of Conduct is a single point of reference that makes it very clear what we must all do and how we must behave to protect each other and our reputation. It explains the boundaries within which we must work every day and brings together in one place all our material ethical principles and policies.

Our shared values are at the core and help guide what we do and how we do it. The ethical and moral decisions we make every day, choosing to do the right things and delivering on our promises, are what build trust with our colleagues, our partners and the communities in which we operate. This Code applies to everyone working for Element Six. Please take time to read it, understand it and follow it.



Personal and Collective Accountability

We are personally and collectively accountable for the actions we take and must apply sound judgment when deciding what to do and how to do it. Our values empower us all to make the right decisions.

- If ever you are in any doubt about the right thing to do when faced with an ethical dilemma or legal concern, please consult the Code.
- If you see or hear anything that is, or may be, contrary to our values, this Code or the policies that support it, make sure you raise your concerns.

YourVoice

No one is ever on their own. Your line manager should be the first person that you turn to in these situations, but we also have an independent service, YourVoice, that enables any employee, colleague or stakeholder to confidentially and anonymously report concerns relating to the integrity of any person's conduct. Find out more about YourVoice on page 31.

By remaining true to our values and complying with the policies and standards within this Code, you are demonstrating your commitment to creating sustainable value that makes a real difference.

We thank you for your co-operation.

A handwritten signature in black ink, appearing to read 'Bruce Cleaver'.

Bruce Cleaver
Chairman, Element Six & CEO, De Beers Group

A handwritten signature in black ink, appearing to read 'Walter Hühn'.

Walter Hühn
CEO, Element Six

Our values

Our values represent our fundamental beliefs. These beliefs reflect those aspects of our way of working that collectively we consider distinctive or unique about Element Six. Our values guide the way we behave at work.



Put safety first

We consider all risks to people and the environment before proceeding with any activity. We address risks before beginning any activity, even if this means stopping a task. Zero harm is always our goal.



Be trusted

We deliver on all our commitments; to our customers and each other. We are recognised for our exceptional, consistent delivery of service and quality. We act with openness, honesty and integrity so our relationships flourish.



Be passionate

We are energised by our products, the solutions we deliver, the challenges we face and the opportunities we create. We are motivated to unlock the value of our products for our customers.



Show we care

The people whose lives we touch and the environment we share matter deeply to us. We nurture, develop and celebrate our people. We always act with their safety and health foremost in our minds.



Pull together

As one global team united in purpose, action and spirit, we use the diversity of our people, skills and experience as an unparalleled source of advantage. We harness our customers' strengths so jointly we continually improve performance of our products and of each other.



Shape the future

Our innovation makes us the leading force in our markets. We will define a new era for the use of our products. We set demanding targets, take tough decisions and considered risks to achieve them. We insist on excellence and reward those who deliver.



Seven important things to know about our Code of Conduct

1. Our Code brings together all the core principles and policies for Element Six, so the essential requirements we all need to follow are clear.
2. Use this Code as a guide directing you to policies, standards and further information sources to help you when you have to make difficult choices about the right thing to do.
3. Our Code applies to everyone across Element Six, including members of the Board of Directors and our Shareholders and their affiliate companies. We all have a responsibility for upholding high standards, whoever we are and wherever we work.
4. People will be held accountable for their behaviour at work and action will be taken where the Code has not been followed. Consequences will depend on how an individual has broken the rules and in what circumstances, and could range from a warning to dismissal.
5. We also expect our contractors, suppliers and agents, along with their employees, to work and act in a way that is consistent with our Code.
6. We have operations in many countries, and those countries all have laws. Our employees are trusted to follow the laws that apply to them and to do the right thing, even when the law does not give specific guidance. When laws set standards that are different from our Code, we expect people to follow whichever sets the higher standard of behaviour.
7. If you are a manager or leader, you have extra responsibilities. You must help your team members to understand and apply our Code, and to demonstrate our values in action through their behaviour. That means acting as a role model for your people by consistently demonstrating the right behaviours, and listening and responding to concerns your people raise.



“We are uncompromising about protecting people from harm and mitigating our impact on the environment.”



Safety

Resources:

- E6 Health & Safety Policy
- E6 Environmental and Sustainability Policy
- Responsible Driving Policy
- STaC work standards for the task at hand
- Risk assessment for the task at hand
- Six elements of safety
- Business Travel Guidelines



Safety is our number one priority

We believe that robust systems for the management of safety, employee health and the environment are a fundamental element of good management practice. These systems are essential for minimising our impact on the environment and creating a safe and productive place to work.

Safety

We believe that all injuries are preventable – our aim is that ‘zero harm’ comes to those who work within and around our operations. Every one of us takes personal responsibility to maintain a safe and secure place of work. We strive to ensure that our operations are fundamentally safe, well designed and maintained by robust and effective management systems.

We comply with all applicable safety laws and regulations in addition to our own policies and requirements.

We ensure that all our staff and contractors are appropriately trained to manage their own safety and that safety standards are consistently applied across our operations. We make sure that we learn from incidents to prevent recurrences, and we work in partnership with our contractors to ensure that our policies, standards, procedures and processes are followed.

At Element Six we specifically prohibit the use of mobile (cell) phones, for any purposes, whilst driving on Company business. This includes hands-free phone calls whilst driving.

Who can I speak to?

- Line Manager
- Local representative or HSE Manager
- E6 Senior Safety Manager



Always

- Look out for your fellow workers and report any potential safety issues.
- Follow the approved STaC for the task.
- Identify, assess and manage all risks associated with the activities you are involved in.
- Know the priority unwanted events in your area of work and ensure all the critical controls are in place and effective.
- Know the safety requirements associated with the work you are doing.
- Deal with safety issues honestly and openly.
- Report all incidents, injuries or illness.
- Close out and act on any learning from safety incidents.
- Stop work if you think it is unsafe.
- Know what to do in case of an emergency.
- Postpone any phone call should you be driving or aware that a colleague is driving (even if they are using a hands free device).



Never

- Start work you are not qualified to perform.
- Ignore a safety issue, however small it may seem.
- Turn a blind eye if safety controls are not in place, are not being followed or don't work.
- Assume someone else will report an incident, risk or concern; safety is everyone's personal responsibility.
- Ignore safety rules and standards.
- Ignore unsafe behaviours, acts or conditions.



Health

Resources:

- Element Six Health & Safety Policy

Who can I speak to?

- Line Manager
- Local HSE Representative or Manager

Health

Providing healthy work environments is a legal and moral imperative for us and constitutes an investment in the productivity of our business. We must always put safety first.

All employees and contractors should be able to return home fit and well at the end of each shift and remain so during the course of their working lives. Our most important focus is on eliminating health hazards at their source. We believe that investing in wellness programs that support healthy lifestyles and emotional resilience promotes employee engagement and productivity. We also endeavour to support employees who are managing long-term physical or psychological conditions.

We comply with all applicable health laws and regulations in addition to our own policies and requirements.



Always

- Take personal responsibility for your own health by wearing the necessary personal protective equipment (PPE) and adhering to mandated work processes.
- Take appropriate preventative measures for any infectious diseases prevalent in the area(s) where you are working.
- Proactively identify health risks and report these to your line manager.
- Ensure that the correct controls are in place when undertaking daily tasks.



Never

- Fail to adhere to mandatory PPE requirements.
- Ignore a failure in controls: take responsibility for reporting them and preventing harm.



Alcohol and drug use

Any employee, contractor or agency worker reporting to work must be free from the influence of alcohol, illegal drugs or any medication that may impair their ability to execute their duties safely and healthily. Consumption of alcohol on or off company premises by all staff continuing to exercise their operational work duties is also strictly forbidden. We also prohibit the possession or consumption of illegal drugs at our work locations. We pursue a policy of educating our employees, we reserve the right to undertake testing, and providing support to those in need, in order to monitor that alcohol or illegal and unsafe drug use is not present in the workplace.



Alcohol and drug use

Resources:

- Local Employee Handbook or HR guidelines
- Alcohol and Drug Policy (Local)

Who can I speak to?

- Line Manager
- Human Resources Representative



Always

- Report to work fit and ready to carry out your tasks.
- Advise your supervisor or line manager if you have doubts about your fitness to work.
- Report situations where a work colleague is under the influence of alcohol or illegal drugs.
- Discuss with your line manager or Human Resources any situation where you suspect or know a colleague is taking prescription drugs which may impair their ability to work or otherwise pose a threat to safety.



Never

- Turn up for work when you are under the influence of alcohol or illegal drugs.
- Consume alcohol during working hours on operational sites.
- Ignore substance abuse.
- Consume illegal drugs when at work on any premises.

The environment

We seek to minimise our impact on the environment by integrating environmental considerations into core planning and operational processes. Central to this is adherence to the legal requirements and standards of Element Six. We use natural resources, including water and energy, sparingly in recognition of the needs of others with whom we share such resources, as well as the economic benefits to our business.

We accept the role we must play in mitigating climate change, ensuring our business remains competitive in a carbon-constrained world, and safeguarding operations against the physical impacts of climate change.



Always

- Consider how your work can contribute to preventing harm to the environment.
- Identify, manage, monitor and report potential environmental risks, and report any incidents.
- Use resources sparingly.



Never

- Ignore a potential or actual environmental incident.
- Undertake work without the necessary environmental authorisations.



The environment

Resources:

- Element Six Environmental and Sustainability Policy

Who can I speak to?

- Line Manager
- Environmental Representative
- Local HSE Manager or Representative



We treat people with care and respect

We achieve our goals through our people. We are committed to our people and their development, and we value their diverse and unique contributions. We are focused on maintaining a work environment where our employees can develop and thrive.

Labour and human rights

We have a fundamental commitment to respecting labour and human rights. This informs our core values. It is further expressed through our observance of core labour rights; being guided by relevant laws and regulations; the United Nations Global Compact and the UN Guiding Principles on Business and Human Rights. We aim to identify, assess and minimise potential adverse human rights impacts that are linked to our business, including by our suppliers or third parties acting on our behalf, through ongoing due diligence and appropriate management. Should

adverse impacts occur as a result of our operations, our objective is to ensure that these are remediated to the greatest possible extent.

We are committed to the International Labour Organization's core labour rights covering the right to freedom of association and collective bargaining, the right to equal remuneration for equal work, and a zero tolerance approach to forced labour, child labour and unfair discrimination.



Always

- Report any potential or suspected labour or human rights abuse in our operations.
- Undertake risk-based due diligence of higher-risk contractors to assess their approach to respecting human rights.



Never

- Acquiesce in any decision likely to result in adverse impacts on the labour or human rights of fellow employees and contractors.
- Neglect the rights of vulnerable and/or marginalised groups in our human rights due diligence process. Ensure that their voices are heard and interests fully represented in any impact analysis or remediation processes being undertaken.



Labour and human rights

Resources:

- Human Rights Policy

Who can I speak to?

- Line Manager
- Human Resources Representative

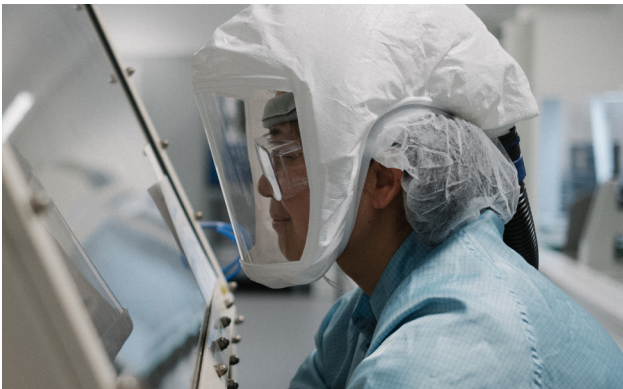
“We are committed to delivering sustainable value and to being true partners in the future.”



Equality (diversity, inclusion and fair treatment)

Element Six is an inclusive place in which to work. A key strength for us is the diversity we have among our employees and in our teams. We value and recognise our differences and are committed to maintaining that diversity and inclusion and to treating people fairly and respectfully. We treat everyone as we would expect to be treated ourselves. We are committed to maintaining a fair workplace free from any form of discrimination. This includes discrimination relating to age, gender, race, culture, religion, marital status, sexual orientation and physical or mental ability.

In some countries, we are required to comply with legal obligations that redress historical issues of inequality (for example, Broad Based Black Economic Empowerment (BBBEE) legislation in South Africa).



Harassment and bullying

We value our employees and treat them with dignity and respect. We do not tolerate harassment or bullying in any form, including sexual and gender-based harassment. Harassment includes any action that can be considered as offensive or intimidating. We all have a right to work in an environment that is free from violence or harassment.



Always

- Speak up if you see or experience harassment or bullying at work.
- Treat everyone with dignity and respect.



Never

- Behave in a way that is intimidating or humiliating to others.
- Distribute or display offensive, threatening or demeaning materials.



Always

- Treat others as you expect to be treated yourself.
- Have the courage to raise concerns about any discrimination you might see.
- Base hiring on merit and performance.



Never

- Discriminate against anyone because of age, gender, race, culture, religion, marital status, sexual orientation and physical or mental ability.
- Disseminate or display materials that can reasonably be expected to cause offence because of their treatment of the above issues; for example, sexually explicit images.



Equality

Resources:

- Local Employee Handbook
- Human Rights Policy
- Inclusion & Diversity Policy
- Group Principles, Flexible Working Local Guidelines

Who can I speak to?

- Line Manager
- Human Resources Representative



Harassment and bullying

Resources:

- Local Employee Handbook
- Human Rights Policy
- Sexual Harassment Policy
- De Beers Group Workplace Bullying and Harassment Policy
- Social Media Policy

Who can I speak to?

- Line Manager
- Human Resources Representative



Personal information and privacy

We respect the privacy of individuals and comply with all applicable laws on the collection, storage, use, retention, transfer and deletion of personal information (including sensitive personal data). We only collect and process personal data for lawful purposes and will only keep that data for as long as it is strictly necessary in light of the purpose for which the data was collected.

We only share personal data with others when there is a legitimate business or legal need to do so.

Personal data is defined as any information relating to an individual person who can be identified from that information. We ensure that the transfer of personal data complies with applicable data privacy laws and that anyone receiving personal data from us understands the importance of protecting that data. Where we work with others, such as suppliers and consultants, we make clear the importance of our standards on data privacy.

We respect the rights each of us has to review, update and correct our personal information.



Always

- Understand what should be classified as personal data.
- Take appropriate measures to protect personal data.
- Use personal data in a way that is consistent with the purpose for which it was collected.
- Seek prior guidance from Group Legal or the Data Protection Champion and complete a Data Protection Impact Assessment (DPIA), where business change may affect the way in which we handle personal data.



Never

- Access personal data unless you have the appropriate authorisation.
- Transfer or provide access to personal data to anyone inside or outside Element Six without prior guidance from Group Legal.



Personal information and privacy

Resources:

- Group Data Privacy Policy
- Employee Privacy Notice – EU
- DPIA Group Data Privacy Impact Assessment Procedures
- Global IM Information Security Policy
- HR Privacy Shield Policy

Who can I speak to?

- Line Manager
- Group Legal
- IM Representative
- Human Resources Representative
- Data Protection Team:
dataprotection@angloamerican.com
- Group Data Privacy Principle
- Data Protection Champion
- Data Protection Officer (Germany)

“We always act in a proper manner, fairly and lawfully”



We conduct business with integrity

We are a trusted company. We seek to build and maintain the trust and confidence of our business partners. We gain our competitive advantage through strong performance, not unethical or illegal practices.

Anti-bribery

We stand against corruption. Bribes and other corrupt payments are unethical, contrary to our values and illegal. We will neither give nor accept bribes nor permit others to do so in our name, either in our dealings with public officials, the communities in which we operate or with suppliers and customers.

Our employees are required to comply with our Business Integrity Policy.

We are committed to taking all reasonable steps to ensure that our business partners also understand and comply with our Business Integrity Policy when doing business with us or on our behalf.

We support efforts to eliminate bribery and corruption worldwide and encourage our suppliers, customers and partners to do the same. We believe in openness and transparency.



Always

- Know who you are doing business with.
- Abide by the Business Integrity Policy and Performance Standards.
- Contact the Code of Conduct Programme manager or Group Legal, if a third party attempts to influence you improperly, or if that could be the perception.
- Attend Business Integrity training if nominated to do so; it is designed to help you manage bribery and corruption risk.



Never

- Offer or accept bribes, kickbacks, any improper payments or other advantage to or from third parties, including facilitation payments.



Anti-bribery

Resources:

- Business Integrity Policy and Performance Standards

Who can I speak to?

- Line Manager
- Code of Conduct Programme Manager
- Business Integrity Champion or Implementation Manager
- Group Legal



Gifts, entertainment and hospitality

Our relationships with suppliers and customers are conducted on the basis of objective factors and are not influenced by the offer or acceptance of gifts or the provision or receipt of entertainment or hospitality. Our policies are not intended to prevent the establishment and building of legitimate business relationships.

However, inappropriate

(i.e. excessive or lavish) gifts, entertainment and hospitality can be seen as a way to gain business advantage unfairly and can amount to an illegal bribe. Gifts, entertainment or hospitality offered or provided to government or public officials carry a heightened risk of perceived bribery and always require careful, prior consultation with Group Legal.



Gifts, entertainment and hospitality

Resources:

- Business Integrity Policy and Performance Standards
- Guide for Employees: Gifts, Entertainment and Third Party Expenses

Who can I speak to?

- Line Manager
- Code of Conduct Programme Manager
- Group Legal
- Business Integrity Champion or Implementation Manager



Always

- Follow the policies and procedures that have been established for considering the appropriateness and the registration and approval of gifts, entertainment or hospitality (given or received).
- Report conduct (including requests for facilitation payments) that may be perceived as an attempt to bribe.
- Remember that gifts, entertainment and hospitality involving government or public officials carry a heightened risk of perceived bribery.



Never

- Offer gifts, entertainment or hospitality in order to gain a business advantage.
- Provide gifts, entertainment or hospitality from your own money to avoid having to register them at work.
- Offer gifts, entertainment or hospitality that are lavish, inappropriate or in cash.
- Accept gifts that may create a sense of obligation, may create a conflict of interest, or may be perceived to influence your (business) judgement.



Conflicts of interest

Our employees, contractors and consultants must avoid actual or perceived conflicts of interest involving themselves, close relatives or associates. Where a conflict could arise, you must draw this to the attention of your line manager or someone in Human Resources. A conflict of interest exists when your personal or professional interests or activities affect your ability to make clear, objective decisions for Element Six.

Actual conflicts of interest must be avoided, but even the possibility of a conflict of interest can be damaging to Element Six and must be disclosed and discussed as early as possible. There are many ways that conflicts of interest could arise.

For example, if you:

- are a board member of another organisation outside work
- have a material interest in a private company that is related to your work
- have another job outside Element Six

- have an intimate relationship with another employee at work who can influence your salary, rating or promotion
- have an intimate relationship with a representative of a business partner or competitor of Element Six

In order for Element Six to avoid any potential perception of exercising improper influence over decision-making, we do not support any political party, group or individual. We do not provide financial or other support for political purposes to any politician, political party or related organisation, or to any official of a political party or candidate for political office, in any circumstances, either directly or through third parties.

As individuals, our employees have the right personally to take part in the political process, including making personal political contributions. However, they must make it clear that such support is based on their own political views and is not attributable to Element Six.



Always

- Consider whether anyone might think you have a conflict of interest.
- Discuss any possible conflict with your line manager or Human Resources as early as you can and be open and transparent about the situation.
- Follow the policies and procedures that have been established for recording and managing conflicts of interest.
- Make sure your personal interests or activities do not create a conflict of interest for you as an employee or representative of Element Six.



Never

- Hide or fail to disclose any actual or possible conflict of interest.
- Use company funds or resources, or personal funds on the company's behalf, to make donations to political parties, or support any political activity, candidate or party.



Conflicts of interest

Resources:

- Business Integrity Policy and Performance Standards

Who can I speak to?

- Line Manager
- Code of Conduct Programme Manager
- Human Resources Representative
- Group Legal
- Business Integrity Champion or Implementation Manager

Suppliers, customers and other business partners

We are careful and fair about how we select and use suppliers, customers and other business partners.

We work with suppliers and partners who share our commitments to safety, integrity and human rights and to the principles set out in our Code. We aim to assess and mitigate risks of improper influence or contact arising out of our interactions with third parties. Our financial performance, profitability and reputation can be damaged by the actions of suppliers, advisers, agents and contractors, and, in certain circumstances, Element Six may be held responsible for their actions. It is never acceptable for any third party to carry out an act on behalf of Element Six which, were it done by Element Six directly, would constitute a breach of the law or this Code and our policies. We strive to provide sustainable, responsible local procurement that positively contributes to a resilient supply chain and the economic and social development of the communities in which we operate.

We focus on establishing long term partnerships with key high-value customers and serving smaller customers through regional distributors, as appropriate to business requirements.

We work with our customers and distributors to ensure that best practice business and safety standards are implemented at all times.



Always

- Comply with procurement and supplier management procedures relevant to your role.
- Treat suppliers and customers in an honest, respectful and responsible way.
- Participate in training and education to understand how improper contact could arise.
- Adhere to the Business Integrity Policy and Performance Standards when involved in procurement processes.



Never

- Encourage a supplier to do something in connection with its business dealings with Element Six that would breach our Code or the law.
- Accept anything that exceeds mandated policy limits from a supplier or potential supplier without seeking prior guidance.
- Provide any supplier or potential supplier with any unfair or improper advantage.



Suppliers, customers and other business partners

Resources:

- Local Procurement Policy (where applicable)
- Business Integrity Policy and Performance Standards
- Human Rights Policy
- Element Six Quality Policy

Who can I speak to?

- Line Manager
- Group Supply Chain
- Group Legal



Quality

We are committed to enhancing our customers' satisfaction with the goods and services that we provide. We will achieve this by continually raising our performance levels across all our processes and activities and by providing customer requirement specific services across the range of industries we support.

'Built-In Quality' is the key area of focus for us, with the key principle being that we design and develop our processes and systems such that they are robust enough to ensure additional inspection is unnecessary. This approach will allow each of us to identify and control the work conditions that guarantee a defect is never made or passed on from a process.



Always

- Aim for the highest levels of customer satisfaction
- Take ownership for the quality of your work at your process
- Ensure you are competent and trained to the standard work for the process, and speak up if you are unsure
- Report Quality problems (e.g. defects, scrap, etc. from your process
- Follow the standard work for the process to build-in quality at source
- Look to continually improve the process to prevent and eliminate defects
- Solve problems with the people closest to the process



Never

- Pass on poor quality to the next process
- Ignore worsening trends in product quality
- Knowingly make products away from the customer specifications, unless agreed by the customer



Quality

Resources:

- Element Six Quality Policy
- Site Quality Manuals
- Electronic databases: GQS (CARs, Concessions, Documents, etc.)
- Built-In Quality module within the Element Six Production System (E6PS)
- Quality Management System guidelines from ISO9001

Who can I speak to?

- Line Manager
- Quality Manager
- Group Quality

Fair competition

We are committed to a free market economy where vigorous but fair competition will result in the most efficient allocation of goods and services, the lowest prices, the highest quality and optimal innovation.

We prohibit anticompetitive practices and will not tolerate any such activity by our employees. We are subject to competition laws (also known as antitrust laws) in almost every jurisdiction in which we do business, and we always conduct our business in compliance with these laws.



Always

- Know who the competitors of Element Six are.
- Obtain prior authorisation before joining a trade association.
- Contact Group Legal if a competitor discloses confidential information to you, directly or indirectly, outside arrangements approved by Group Legal.
- Participate in the compliance programme (including training) if nominated to do so; it is designed to help you manage competition law risk.
- Notify Group Legal without delay if you receive communication about an antitrust investigation and fully cooperate with enforcement agencies in the event of an antitrust investigation.



Never

- Reach an agreement or understanding with a competitor to:
 - fix purchase or selling prices
 - limit production or supply
 - allocate customers or markets
 - rig bids
- Disclose confidential information to a competitor, directly or indirectly, without first discussing with Group Legal.
- Denigrate a competitor or its products or services.



Fair competition

Resources:

- Group Antitrust Policy

Who can I speak to?

- Group Legal



Trade controls and sanctions

We comply with the trade laws and regulations of each country in which we do business.

This includes economic sanctions, and import and export laws.

Various countries and organisations, such as the US or the United Nations, have imposed trade sanctions against certain countries, organisations and individuals. Many of these sanctions apply to transactions beyond the borders of the country imposing them. Economic or trade sanctions are complicated and far-reaching. If you are in any way

involved in business or transactions with a sanctioned country, entity or person, you must ensure compliance with all applicable laws. You should consult with Group Legal as early as possible in such situations.

The import or export of certain goods or services may be prohibited or subject to regulatory requirements (such as obtaining a licence).

Certain equipment, software and technology may need to be classified in advance, and have in place all appropriate labelling, documentation, licences and approvals before it is imported or exported.



Always

- Check early with Group Legal where you may be dealing with a sanctioned country, company or individual.
- Work out whether anything you are importing or exporting needs a license.



Never

- Transact with a third party that you do not know (without having conducted appropriate due diligence).
- Import or export new products or services without first checking whether they are subject to special regulatory requirements.



Trade controls and sanctions

Resources:

- Business Integrity Policy and Performance Standards

Who can I speak to?

- Group Legal
- Distribution Centre Manager





Money laundering and the financing of terrorism

Element Six is committed to compliance with all relevant legislation and guidelines relating to the prevention of money laundering and to the combating of terrorism in the jurisdictions in which it operates. Money laundering happens when criminal money or assets are hidden in otherwise legitimate business dealings, or when legitimate funds are used to support terrorism or crime.

Should any employee have cause to suspect that Element Six might be or has been exposed to funds for which the source is doubtful, the circumstances must be reported to the appointed Money Laundering Reporting Officer (MLRO), where relevant, and/or Group Legal. Should any act of money laundering or financing of terrorism potentially be indicated, this would need to be notified to the relevant regulatory authorities without delay.

All employees must immediately refer any enquiries from regulators or public authorities promptly to the relevant MLRO and/or Group Legal, and must not make any comment without clearance.



Always

- Know exactly who you are doing business with; where relevant, make sure you perform due diligence on new business partners.
- Raise concerns if you see something that may look like money laundering.
- Participate in training if nominated to do so; it is designed to help you manage money laundering risk.



Never

- Deal with criminals or get involved with money laundering.
- Fail to report suspected money laundering.



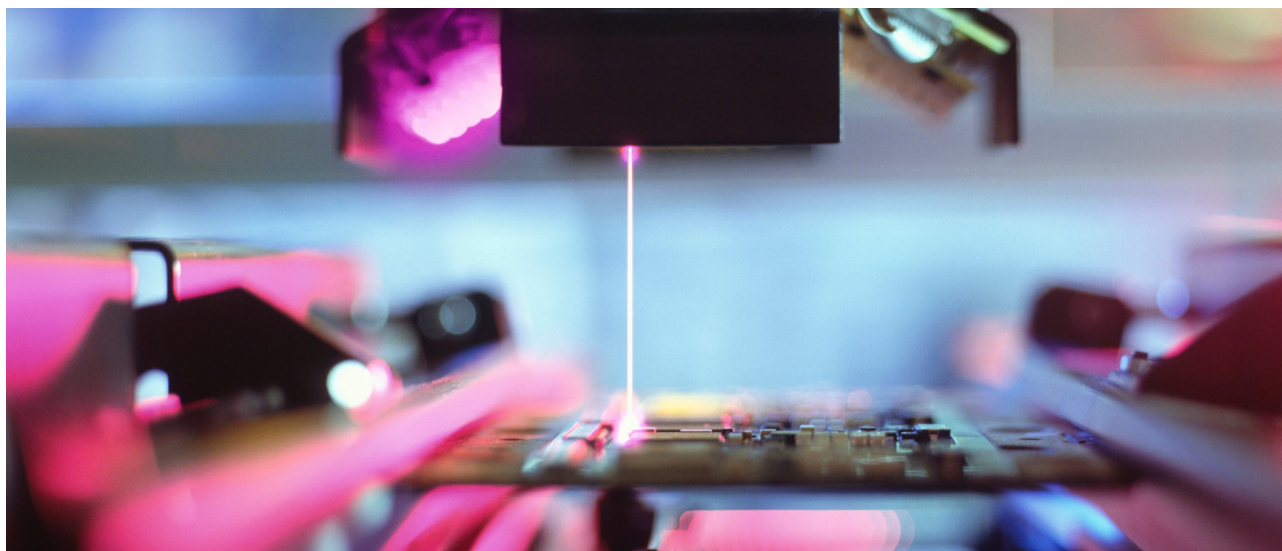
Money laundering and the financing of terrorism

Resources:

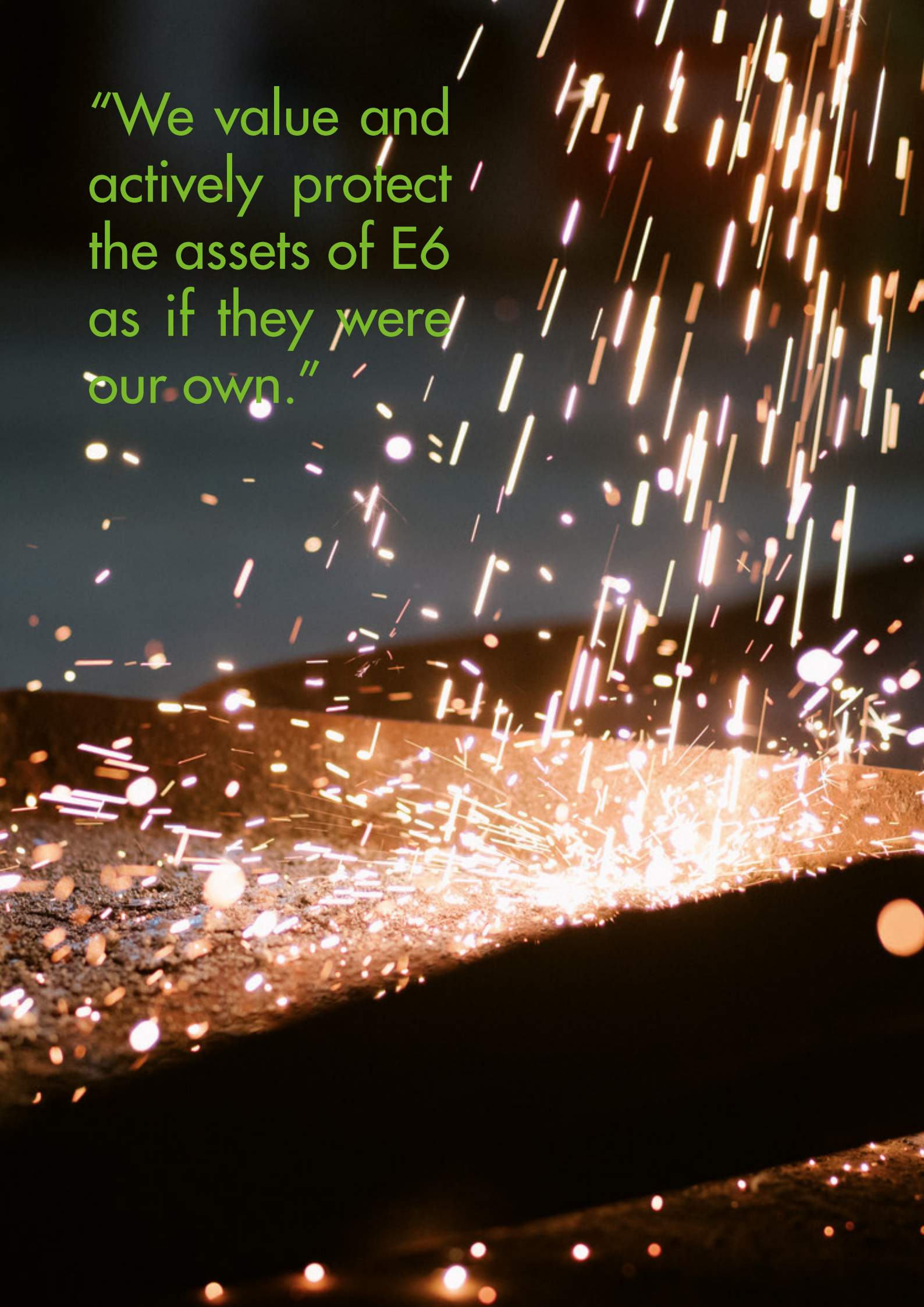
- De Beers Group Policy: Anti Money Laundering and Combating the Financing of Terrorism
- Anti-Money Laundering/Combating the Financing Terrorism Procedures for Element Six

Who can I speak to?

- Money Laundering Reporting Officer
- Group Legal
- Group Finance



“We value and actively protect the assets of E6 as if they were our own.”



We protect our physical assets, information and interests

We want to protect the reputation, assets and information held by Element Six. We do this by using our resources wisely and carefully.

Information security

Element Six is committed to the protection of our information assets and the need for effective information security management. Everyone has a responsibility for information security and has a role to play in protecting information assets of Element Six in order to:

- prevent the loss or misuse of Element Six information
- ensure Element Six meets its legal, regulatory, ethical and contractual obligations, and especially with regards to highly restricted, confidential and personal data
- instil a culture of secure working practices

We ask all employees, during and subsequent to their employment, to use reasonable measures to ensure the confidentiality of Element Six information. This means that everyone is responsible for ensuring that only authorised individuals have access to company information. All staff and contractors must use the measures provided by Element Six to protect this information.



Always

- Familiarise yourself with the relevant policies.
- Determine the information classification of a piece of information according to its value and sensitivity as outlined in the relevant guidelines.
- Apply the appropriate level of controls to secure the data according to its value.
- Only connect authorised Element Six computers to the corporate network.



Never

- Use unapproved public IT services for company information.
- Have 'highly restricted' or 'confidential' conversations in public places.
- Click on website links or attachments from unknown senders, or if they look suspicious or were unsolicited.



Information security

Resources:

- Global IM Acceptable Use Policy
- Global IM Information Security Policy

Who can I speak to?

- Line Manager
- IM Representative



Accuracy of data, information and records

We all take part in the recording of financial and non-financial information. We create many records daily – from customer contracts and reports for regulatory agencies, to timesheets and expense reports. Telephone records and e-mails are considered business records. Our stakeholders rely on the accuracy, completeness, timeliness, transparency and honesty of our records, reports and disclosures. All business records and information we create, in whatever form, must reflect the true nature of transactions and events. We must be open and honest about our recording and reporting of information, and be clear about both good and bad reports.



Always

- Make sure that all transactions are properly authorised, recorded and reported.



Never

- Create false reports or records, or try to disguise what really happened.
- Destroy records unless authorised to do so.



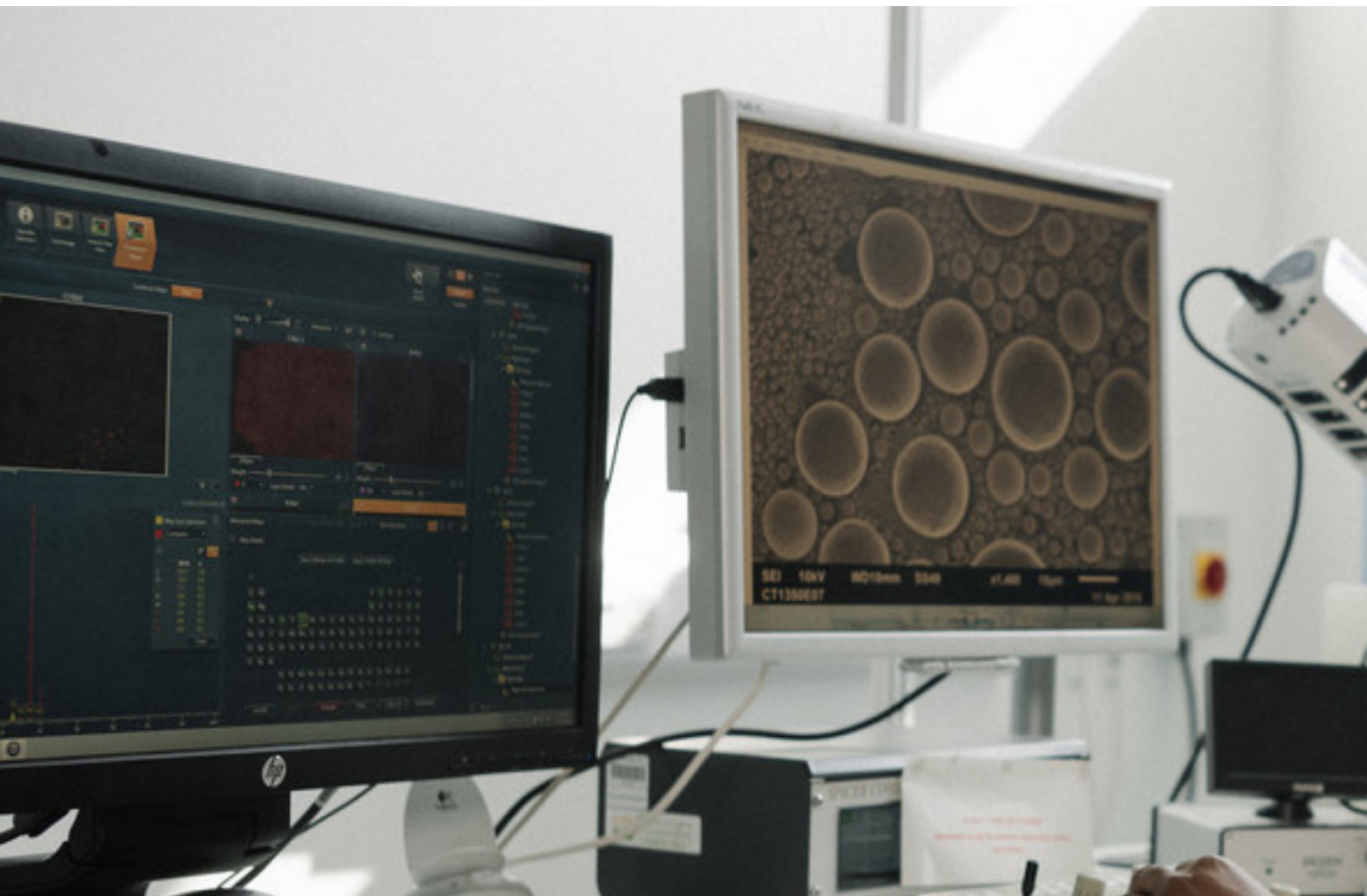
Information security

Resources:

- Global IM Acceptable Use Policy
- Global IM Information Security Policy

Who can I speak to?

- Line Manager
- IM Representative



Use and protection of company property

We must all protect the assets and property of Element Six. These include facilities, property and equipment, vehicles, computers and information technology (IT) systems, employee time information, corporate opportunities and money.

Employees have a responsibility to protect the assets and resources of Element Six against theft, loss, abuse, unauthorised access or disposal.

Employees may use the assets of Element Six including human capital, only for purposes related to discharging

their Element Six job responsibilities and other such uses as are authorised.

Occasional personal use of company IT assets is permitted, within reason, as long as it does not compromise the interests of Element Six or adversely affect your job performance.

The use of assets of Element Six by third parties is generally acceptable in situations where there is a transparent and proper underlying business purpose for, or clear public benefit from, the use of the asset.



Always

- Prevent non-authorised personnel from accessing our facilities, information, data or other assets.
- Comply with the Business Integrity Policy when making our property available to third parties.
- Comply with the Global IM Acceptable Use Policy.



Never

- Use Element Six's assets and resources for personal gain.
- Ignore security threats to assets.
- Offer the use of Element Six's property to influence a third party in connection with Element Six's business or offer something that could be perceived as a political donation.



Information security

Resources:

- Global IM Acceptable Use Policy
- Global IM Information Security Policy

Who can I speak to?

- Line Manager
- Local Security Team
- Group Finance
- IM Representative







Communicating externally

Resources:

- De Beers Disclosure and Media Policy
- Social Media Policy
- Communications Processes
- Group Antitrust Policy

Who can I speak to?

- Line Manager
- Head of Marketing Communications
- Group Legal

Communicating externally

Our communication, both written and verbal, should be clear, accurate, consistent and responsible. It must also comply with laws and regulations. For this reason, only those who have been authorised to do so in advance should talk to the media and make disclosures. Communication with the media, external speeches and presentations should be seen as an opportunity that can, when properly managed and executed, enhance the reputation of Element Six. All our external advisers are subject to our Disclosure and Media Policy.

Any employees using social media in connection with Element Six should always remember that they are a brand ambassador and strive to maintain the reputation of Element Six by upholding its values. Employees wishing to comment personally on issues directly relevant to Element Six should always use their real name, be transparent about their affiliation to Element Six, and make it clear that their opinions are their own and are not given on behalf of Element Six.



Always

- Consult early with the head of Marketing Communications before making any communication that could affect Element Six.
- Provide advance notice to the head of Marketing Communications of activity likely to cause media and other external stakeholder interest.



Never

- Speak to the media without first consulting with the head of Marketing Communications.
- Publicise personal grievances through social media.
- Disclose via external communications Anglo American's, De Beers or Element Six's commercially sensitive information without prior legal approval.

Insider dealing

It is illegal to deal in our shareholders' or third-party securities or shares on the basis of inside information, or to encourage others to do so. Some employees will become aware of information about Element Six shareholders that is confidential and that could influence anyone contemplating investing in our shareholders' shares or securities. Employees are forbidden to use confidential or inside information of Element Six for personal advantage. Employees are also prohibited from sharing confidential or inside information with others for the same purpose.

We protect our organisation and our shareholders through responsibly managing confidential information. Confidential information includes technical information about products or processes, vendor lists, pricing, marketing or service strategies, as well as non-public financial reports and information about mergers, sales and acquisitions.



Always

- Make sure you know how to classify and handle confidential information.



Never

- Use inside information to gain personal advantage by trading in Anglo American or Umicore shares or securities.
- Share or provide tips to others (for example, family members) to gain advantage.



Insider dealing

Resources:

- Fidelity Undertaking Agreement

Who can I speak to?

- Group Legal
- Line Manager



Intellectual property

Intellectual property refers to know-how, inventions, industrial designs, artistic work and literature, symbols, names and images. Examples include:

- technologies and processes for growing diamonds;
- applications for synthetic diamonds;
- new materials and products;
- new geometries;
- websites and advertising marketing materials including text, graphics, and photographs;
- software and videos; and
- logos and brand names.

We protect our intellectual property, including patents, designs, know-how, copyright, domain names and trade marks.

Our intellectual property gives us a competitive advantage. Unauthorised use of our intellectual property by third parties may damage our brands and our reputation.

We will not knowingly infringe the valid intellectual property of third parties, such as suppliers, competitors and customers, and we only use it where we are properly authorised to do so.

When undertaking research and development activities, employees must keep accurate records of these activities, such as the date on which the activities are performed and the persons involved in performing the activities.

All intellectual property rights created, designed or made during the course of any employee's work belong to Element Six.



Always

- Report any suspected misuse of our intellectual property.
- Seek advice before using third party intellectual property.



Never

- Share confidential information with third parties without obtaining proper authorisation to do so.



Intellectual property

Resources:

- Intellectual Property Policy and Procedure
- Fidelity Undertaking Agreement
- Global IM Acceptable Use Policy
- Global IM Information Security Policy

Who can I speak to?

- Group IP
- Line Manager
- Group Legal



YourVoice

If you see an individual act or behave in a way which you think is a breach of our Code or might be illegal or unethical, you have a responsibility to bring this to the attention of Element Six. This takes courage, but it demonstrates our unwavering commitment to do what is right. This can be done in a variety of ways.

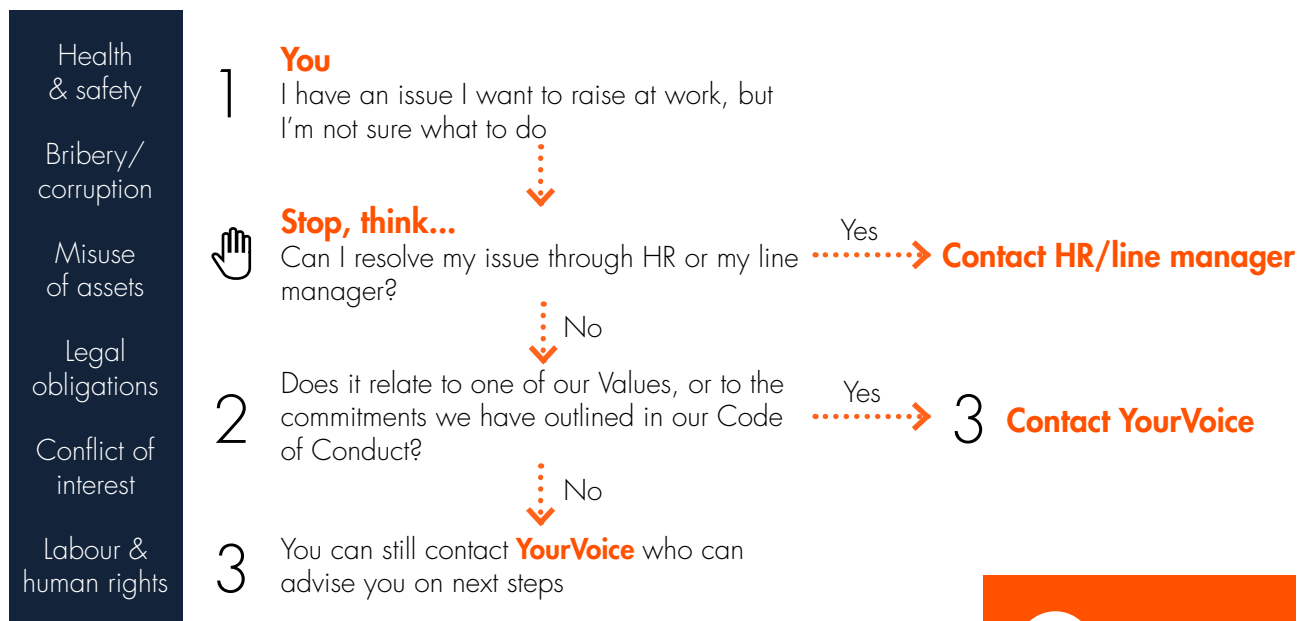
- Your line manager should always be available to you as a point of contact to hear your concerns;
- If you feel that you cannot talk to your line manager, then you should try to speak to another line manager;
- If you do not feel comfortable speaking to any line managers, then you can try to speak to someone who works in a supporting function, such as Health and Safety, Group Legal or Human Resources;
- If you do not feel comfortable speaking to any of the above, then you can contact YourVoice.

Our YourVoice programme is a confidential reporting service for all employees, suppliers, business partners and stakeholders of Element Six and

De Beers to raise concerns about potentially unethical, unlawful or unsafe conduct and practices that contravene our Code.

We earn and maintain the trust of our stakeholders by living our values. Where this is not the case, you are putting at risk yourself, your colleagues, our business and our reputation.

When to use YourVoice



YourVoice serves to build employee, supplier and business partner loyalty through identifying and eliminating unethical practices. YourVoice is managed by an independent external company and is available every day of the week at any time, day or night. The use of an external provider fully protects the identity of the individual, whose identity will never be disclosed to Element Six without that person's express consent. YourVoice can take calls in many languages and can be contacted directly from most locations. Any report you make will be kept confidential in full accordance with our policies and applicable legislation protecting acts of disclosure.



YourVoice

Resources:

- YourVoice website:
www.yourvoice.debeersgroup.com
- Anglo American Whistleblowing Policy

Zero tolerance commitment on retaliation

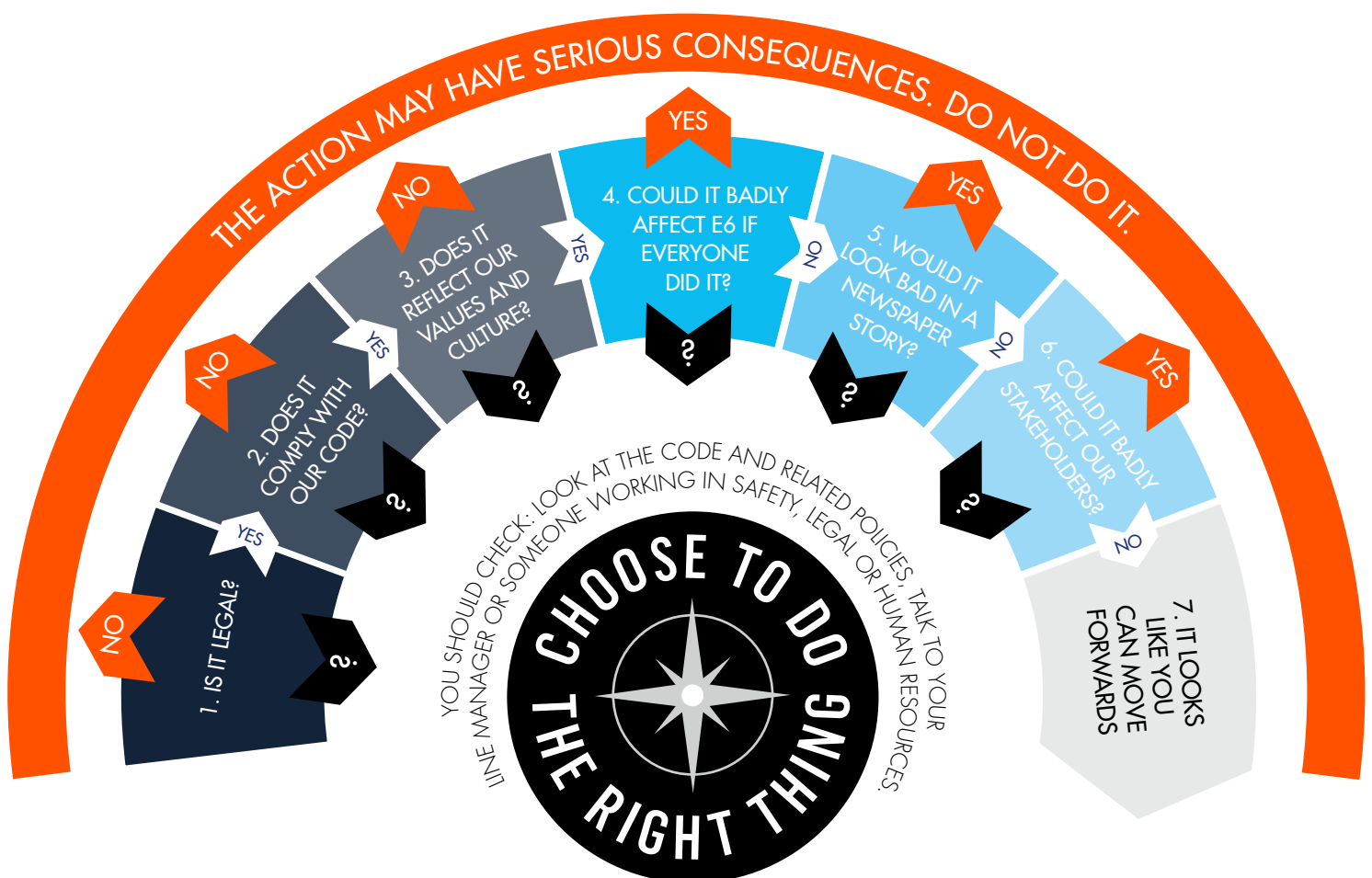
We prohibit any form of punishment, disciplinary or retaliatory action being taken against anyone for raising or helping to address a genuine business conduct concern. Retaliation is grounds for disciplinary action including dismissal.

If you feel you or someone you know has faced retaliation, you should raise a concern immediately in line with the YourVoice section of this Code.

What should I do if I am unsure about anything?

The Code covers many things, but it does not cover everything. We trust you to use good judgement to make ethical decisions and to ask for help when you have questions or concerns.

You can use the following decision tree to help you.



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