

DE BEERS GROUP

DE BEERS PLC  
UK MODERN SLAVERY ACT  
STATEMENT

---

FOR THE FINANCIAL YEAR ENDING 31 DECEMBER 2023

# CONTENTS

<b>INTRODUCTION</b>	<b>3</b>
Statement by CEO	3
Adherence to other reporting legislation	4
<b>OVERVIEW OF OUR GROUP</b>	<b>4</b>
Overview of our Business	5
Key Updates to our Business	6
<b>GOVERNANCE, POLICIES, PROGRAMMES AND ASSURANCE FOR HUMAN RIGHTS</b>	<b>7</b>
Governance	7
Policies, Procedures, Standards and Programmes	8
<b>PROGRAMMES AND PROCESSES TO SUPPORT RISK ASSESSMENT AND DUE DILIGENCE</b>	<b>10</b>
Across our Group and Value Chain	10
At our Upstream Operations	15
At our Midstream Operations	16
At our Downstream Operations	18
At our Other Businesses	19
Beyond our Business	20
<b>TRAINING</b>	<b>22</b>
<b>PLANS TO STRENGTHEN OUR APPROACH IN THE FUTURE</b>	<b>23</b>
Across our Group and Value Chain	23
At our Upstream Operations	23
At our Midstream Operations	23
At our Other Businesses	23
Beyond our Business	24

# INTRODUCTION

## STATEMENT BY CEO

This is the eighth Modern Slavery Statement<sup>1</sup> made by De Beers plc, the parent company of De Beers Group<sup>2</sup> and its relevant subsidiaries and managed joint ventures, pursuant to section 54 of the Modern Slavery Act 2015 (the Act)<sup>3</sup> for the financial year ending 31 December 2023.

At De Beers Group, respect for human rights is embedded at all our operations and in our culture. It is one of the five Critical Foundations of our Building Forever sustainability framework and it is also a commitment we make in our Code of Conduct along with all our principal policies and programmes. Our policies set strict requirements relating to the respect of human rights, including labour rights, non-discrimination, and the prohibition of the use of child and forced labour, enabling us to comply with local legislation across all our value chain and adhere to international labour and human rights conventions. We take a zero-tolerance approach to the use of all forms of modern slavery, whether that be in our organisation, our supply chains or the wider diamond value chain.

Our Modern Slavery Statement sets out the steps that we have undertaken to identify and mitigate potential risks of modern slavery in our business and supply chains. During 2023 no issues of modern slavery, forced labour and child labour were identified or reported across the De Beers Group value chain. The following statement provides an update on De Beers Group business activities; its policies and processes for conducting human rights due diligence to identify modern slavery, forced labour and child labour risks; reviews the effectiveness of policies and processes being implemented; and includes details of training programmes used to build awareness. It also includes an update on progress made during 2023 and our plans to strengthen our approach in 2024.

This Statement was approved by the Board of De Beers plc on 17 July 2024.

**Al Cook**  
**Chief Executive Officer**



<sup>1</sup> De Beers plc Modern Slavery Statements have been published annually since 2017 and are available [here](#). A separate Modern Slavery Statement is being made by Anglo American and its relevant owned and controlled entities, available [here](#).

<sup>2</sup> For ease of reading, in this Statement we use generic language to describe the group. References to "De Beers", "De Beers Group", the "Group", "we", "us", and "our" are used to refer to either De Beers plc and its subsidiaries and/or those who work for them generally, or where it is not necessary to refer to a particular entity, entities or persons. The use of those generic terms in this Statement is for convenience only and is in no way indicative of how De Beers Group or any entity within it is structured, managed or controlled. De Beers Group subsidiaries, and their management, are responsible for their own day-to-day operations, including (but not limited to) securing and maintaining all relevant licences and permits, operational adaptation and implementation of Group policies, management, training and any applicable local grievance mechanisms. De Beers produces group-wide policies and procedures to ensure best uniform practices and standardisation across De Beers Group but is not responsible for the day-to-day implementation of such policies. Such policies and procedures constitute prescribed minimum standards only. Group operating subsidiaries are responsible for adapting those policies and procedures to reflect local conditions (where appropriate) and for implementation, oversight and monitoring within their specific businesses.

<sup>3</sup> The De Beers Group entities that we have assessed as being subject to section 54 of the Act are: De Beers UK Limited, Element Six Technologies Limited, Element Six (UK) Limited and Charterhouse CAP Limited. The board of each of these entities has approved this Statement. This Statement also reports on relevant activities across De Beers Group, including our global operations and the following additional UK-based entities: Lightbox Jewelry Ltd, Gemfair Limited, Forevermark Ltd, De Beers Jewellers Limited, Element Six Holdings Limited, Element Six Abrasives Holdings Limited, Tracr Limited, and IIDGR (UK) Limited. The board of each of these entities has approved this Statement.

# ADHERENCE TO OTHER REPORTING LEGISLATION

A separate is being made by De Beers Canada Inc pursuant to section 11(1) and 11(2) of Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023 (Canadian FLCLA). It is available [here](#).

## OVERVIEW OF OUR GROUP

Established in 1888, De Beers Group is a leading global diamond company with expertise in the exploration, mining, sales and marketing of diamonds, as well as the manufacture of synthetic diamond and supermaterials. Together with our joint venture partners, we employ 23,000 people, including contractors, across the diamond pipeline.

Our ultimate parent company is Anglo American plc (Anglo American), which owns 85% of De Beers. The remaining 15% shareholding is held by the Government of the Republic of Botswana.

Innovation sits at the heart of our strategy allowing us to offer a portfolio of businesses that includes our jewellery houses, De Beers Jewellers™ and De Beers Forevermark™, and pioneering industry services, such as diamond sourcing and traceability initiatives GemFair™ and Tracr™<sup>4</sup>.

The diagram below shows a simplified overview of our Group’s business units. The purpose of this diagram is to assist the reader in understanding this statement; it is not intended to be a complete representation of our Group corporate structure.

For more information on De Beers Group, please visit: [www.debeersgroup.com](http://www.debeersgroup.com).

### OUR VALUE CHAIN

EXPLORATION	ROUGH DIAMOND PRODUCTION	ROUGH DIAMOND TRADING	TECHNOLOGY AND SERVICES	JEWELLERY HOUSES	BEYOND THE NATURAL DIAMOND PIPELINE
<b>GLOBAL EXPLORATION</b> De Beers Group’s prospecting and exploration unit. Explores for rough-diamond deposits around the world.	<b>MANAGED OPERATIONS</b> De Beers Group’s managed mining operation unit. Recovers rough diamonds from Gahcho Kué mine in Canada and Venetia mine in South Africa.  <b>DEBSWANA</b> A 50/50 joint venture partnership in Botswana with the Government of the Republic of Botswana. Recovers rough diamonds from the Jwaneng, Orapa and Letlhakane mines.  <b>NAMDEB HOLDINGS</b> A 50/50 joint venture partnership in Namibia with the Government of the Republic of Namibia. Recovers rough diamonds on land through Namdeb, and off the coast through Debmairne Namibia.	<b>SIGHTHOLDER SALES</b> Sorts, values and sells the majority of De Beers Group’s rough-diamond supply through term contracts to Sightholders. Also sells to local businesses established in diamond-producing countries to support the development of local cutting and polishing operations and citizen value-creation.  <b>AUCTIONS</b> Sells approximately 10 per cent of De Beers Group’s rough diamonds, by value, via online auctions.	<b>DE BEERS INSTITUTE OF DIAMONDS</b> Provides grading and inscription services to the diamond industry via specialist facilities in the UK, India and Belgium, along with industry education and training services.  <b>IGNITE</b> De Beers Group’s innovation and technology function comprising diamond mining, sorting and detection technology for the diamond industry.	<b>DE BEERS JEWELLERS</b> Represents the pinnacle of luxury diamond jewellery, present in approximately 30 of the most prestigious locations around the world.  <b>DE BEERS FOREVERMARK</b> Offers premium, contemporary diamond jewellery, in more than 2,400 retail jewellers worldwide.	<b>ELEMENT SIX</b> Develops and produces synthetic diamonds and supermaterials for use in technological and abrasive applications across a number of industries.  <b>LIGHTBOX™</b> Laboratory-grown diamond jewellery brand that provides consumers with high-quality fashion jewellery designs for everyday, casual occasions.

### DE BEERS GROUP OWNERSHIP

ANGLO AMERICAN PLC **85%**

GOVERNMENT OF THE REPUBLIC OF BOTSWANA **15%**

● Countries in which De Beers Group’s diamond recovery operations are located.

■ Countries in which De Beers Group conducts one, some or all of the following functions: exploration, recovery, rough-diamond sales, technology, services, marketing, and retail. Production is on a 100 per cent basis except for the Gahcho Kué joint operation, which is on an attributable 51 per cent basis.

DE BEERS GROUP BUILDING FOREVER: OUR SUSTAINABILITY REPORT 2023 9

<sup>4</sup> Forevermark™, DE BEERS™, Building Forever™, Tracr™ and Gemfair™ are Trademarks of De Beers Group. Lightbox™ is a Trademark of Lightbox Jewelry Ltd.

# OVERVIEW OF OUR BUSINESS

## Exploration

We have diamond prospecting activities in Angola, Botswana, Canada, and South Africa.

## Production

We recover rough diamonds in Botswana, Canada, Namibia and South Africa through the following entities.

- Wholly owned entities
  - » De Beers Consolidated Mines Limited (South Africa)
  - » De Beers Canada Inc.
- Joint venture operations
  - » Debswana Diamond Company (Pty) Limited (Debswana) is a 50/50 joint venture with the Government of the Republic of Botswana Namdeb Holdings (Pty) Ltd is 50/50 joint venture with the Government of the Republic of Namibia.

## Sales

The majority of our rough diamond production mined from Botswana, Canada, Namibia and South Africa is aggregated by De Beers Global Sightholder Sales (Pty) Ltd (GSS) in Botswana and sold primarily by way of long-term contract by GSS. A proportion of aggregated production is sold through De Beers Sightholder Sales South Africa and Namibia Diamond Trading Company and through our auctions division De Beers Auctions in Belgium, Israel, India, Hong Kong, and Singapore.

## GemFair™

De Beers Group established GemFair in 2018 to link artisanal miners with the international market by providing assurance of ethical mining standards and harnessing digital technology. It has since grown into a world-leading proven and inclusive model for the ethical sourcing of artisanal diamonds and continues to evolve.

- For more information on GemFair, please visit: [www.gemfair.com](http://www.gemfair.com).

## Ignite

Ignite develops sustainable cutting-edge technologies and innovative products and services for our business and the wider industry. Headquartered in the UK, it has hubs in South Africa, India and Singapore, researching, developing and providing varying technologies that support mine life expansion, identify new methods for verifying and sorting diamonds and produce technology that helps to ensure that all synthetic (laboratory-grown) diamonds and treatments (enhancements to diamonds) can be detected.

- For more information on De Beers Group Ignite, please visit: <https://ignite.debeersgroup.com/>.

## De Beers Institute of Diamonds

The Institute of Diamonds (IoD) provides diamond grading and inscription services for natural and untreated diamonds and diamond testing services, using De Beers Group proprietary technology deployed within our own laboratories. Services are offered through laboratories in Antwerp in Belgium, Surat in India and Maidenhead in the UK.

- For more information on the IoD, please visit <https://institute.debeers.com/en-gb/>.

## Brands

We have two diamond jewellery brands: De Beers Forevermark (which includes Libert'aimé by De Beers Forevermark and Forevermark-operated retail stores in China) and De Beers Jewellers (DBJ).

DBJ is a global diamond jewellery retailer, with 25 managed retail stores in 6 consumer markets around the world. De Beers Forevermark also offers an inscription, grading and branding service to diamantaires and retailers for eligible polished diamonds across 30 countries.

- For more information on DBJ, please visit <https://www.debeers.co.uk/en-gb/home>.
- For more information on De Beers Forevermark, please visit <https://www.forevermark.com/>.

## **Synthetic Diamonds and Supermaterials**

Element Six is a global leader in the design, development and production of synthetic diamonds and tungsten carbide material (or 'supermaterials') used primarily for industrial purposes. It is made up of two businesses: Technologies (wholly-owned by De Beers Group); and Abrasives (approximately 60% owned by De Beers Group, with Umicore, a global materials technology and recycling group, owning the remaining share). Element Six has manufacturing facilities in Germany, Ireland, South Africa, the UK, and the USA.

- For more information on Element Six, please visit: [www.e6.com](http://www.e6.com).

## **Lightbox™**

A wholly-owned De Beers Group business selling laboratory-grown diamond jewellery wholesale and online to consumers.

- For more information on Lightbox, please visit: [www.lightboxjewelry.com](http://www.lightboxjewelry.com).

## **Tracr™**

Tracr is an innovative connected value chain platform developed by De Beers Group. Using advanced technology including the internet of things, artificial intelligence, blockchain and state-of-the-art security and privacy, it is able to connect the entire diamond value chain and helps to ensure provenance, traceability and authenticity of natural diamonds.

- For more information on Tracr, please visit: [www.tracr.com](http://www.tracr.com).

## **Internal Function - De Beers Group Supply Chain**

The De Beers Group Supply Chain function is responsible for the procurement of ancillary goods and services to support our Group's upstream activities.

## KEY UPDATES TO OUR BUSINESS

### **NEW AGREEMENT IN PRINCIPLE BETWEEN THE GOVERNMENT OF THE REPUBLIC OF BOTSWANA AND DE BEERS GROUP**

The Government of Botswana and De Beers reached an agreement in principle on a 10-year Sales Agreement for Debswana's rough diamond production through to 2033 and a 25-year extension of the Debswana mining licences through to 2054. This agreement will increase the share of Debswana supply sold via the state-owned Okavango Diamond Company to 30 per cent, progressively increasing to 50 per cent by the final year of the contract.

This agreement reflects the aspirations of the people of Botswana, accelerating the country's economic diversification and promoting the creation of tens of thousands of new jobs with a focus on supporting the growth of a knowledge-based economy.

### **UPDATE ON OUR MINING OPERATIONS IN CLOSURE**

At our Canadian mines in active closure, Victor in Ontario and Snap Lake in NWT, we are continuing with the implementation of their closure plans in alignment with the Social Way 3.0 as well as Anglo American's Mine Closure Toolbox and rehabilitating the land in collaboration with our partner communities.

Our Voorspoed Mine in South Africa ended production in 2018 and, in September 2023, the planned decommissioning of the plant infrastructure was completed.

For more information, please see our 2023 "[Building Forever: Our Sustainability Report](#)".

### **ANGOLA DEVELOPMENT**

In 2023, De Beers Group started exploration activities in Angola, after signing two Mineral Investment Contracts (MICs) with the Government for diamond resource development in April 2022.

Should we discover an investment opportunity in the region, we will apply the same Building Forever framework that has been a catalyst for sustainable economic, social and environmental change in neighbouring Botswana and Namibia and we intend to develop these resources in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance).

## GOVERNANCE, POLICIES, PROGRAMMES AND ASSURANCE FOR HUMAN RIGHTS

### GOVERNANCE

Accountability for sustainability at our Group rests with the Board of Directors of De Beers plc. The Board is supported by the Executive Committee and the Sustainability Committee. A summary of our governance approach in 2023 is shown in the below diagram.

#### HUMAN RIGHTS WORKING GROUP

The mandate of our Human Rights Working Group was reviewed in 2022 and formally implemented in 2023. With members drawn from across functions of the business, the group is responsible for the ongoing identification of potential or actual adverse human rights impacts across the business and for establishing mitigation strategies. It seeks to ensure our management systems, approaches, policies and actions address salient human rights issues, while seeking to prevent adverse impacts.

2023 saw the creation of a gender-based violence working group, which reflects the importance of tackling this human rights abuse across our organisation. This cross-functional group, overseen by our mining operation General Managers, drives deeper understanding of the challenge and identifies ways in which to integrate response and prevention into organisational processes and initiatives.

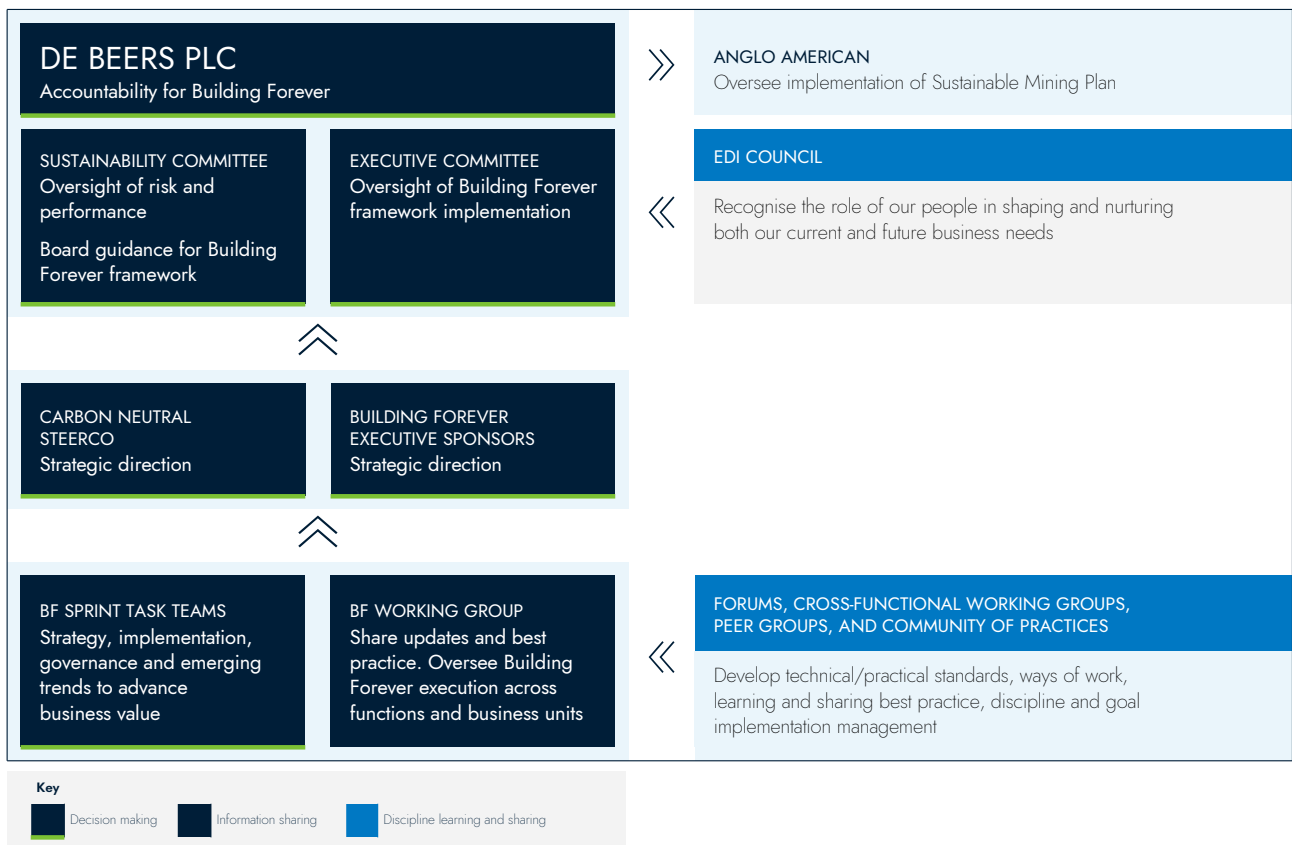
#### THE BUSINESS, ETHICS, RISK AND CONDUCT COMMITTEE (BERC CO)

BERC Co (formerly known as Best Practice Principles Committee) oversees the standards and policies we uphold. BERC Co is mandated to investigate potential non-compliances against the standards outlined in the Best Practice Principles (BPP) Assurance Programme or the Pipeline Integrity (PI) Programme by any participant of the programmes. The outcomes of which may inform commercial decisions. It also oversees the implementation of the De Beers Group Sourcing Policies for Diamonds and for Metals, Minerals and Gemstones. This includes being responsible for addressing and ensuring that any allegations, reports or confirmations of non-compliance that might have a human rights impact are duly considered.

Any material breaches of the BPP Programme by a Sightholder including those related to non-compliance with applicable human rights requirements, constitutes a breach of the Sightholder Supply Agreement, and will be addressed accordingly by BERC Co.

#### SUSTAINABILITY COMMITTEE

The Sustainability Committee, which reports into the De Beers plc Board, also has oversight over how impacts on human rights are considered and managed within our operations. Topics that were covered in 2023 by the Committee included: performance updates on group safety and sustainable development and risk, social performance, sustainability risk management, updates from all business units' sustainability governance and management processes, and delivery of our Building Forever 2030 goals and commitments updates.



## POLICIES, PROCEDURES, STANDARDS AND PROGRAMMES

### OUR GUIDING PRINCIPLES

We hold ourselves and those we work with accountable for respecting human rights and conducting human rights due diligence aligned with the United Nations Guiding Principles on Business and Human Rights (UNGPs).

To ensure this, we set strict requirements relating to respect for human rights, including labour rights, non-discrimination and the prohibition of the use of child and forced labour which are enshrined in our BPP Programme (see page 10 for more details). This set of ethical, social, and environmental standards, launched in 2005, helps to ensure we adhere to international human rights frameworks and applicable labour regulations.

The BPP Programme sets mandatory requirements for our own operations as well as all those doing business with us in the natural diamond supply and value chains, currently 2,637 entities employing 306,654 people, including Sightholders and their relevant contractors. The BPP Programme is fully aligned to the UNGPs, the International Labour Organisation (ILO) Standards and the OECD Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance), among others. These principles and standards are also reflected in the Responsible Jewellery Council (RJC) Code of Practices, of which De Beers Group is a founding and certified member.

Human rights provisions are stipulated in several of our internal policies, including our Code of Conduct, Workplace Human Rights Policy, our Security Services and Human Rights Policy and both of our [Responsible Sourcing Policies for Diamonds](#) and for [Precious Metals, Minerals and Gemstones](#).

In 2023, following a review of our previous employee human rights policy, we published a revised Workplace Human Rights Policy that explicitly prohibits modern slavery, forced labour and child labour. This was accompanied by the launch of a new 'Introduction to human rights' course, helping our employees understand



what we stand for as a business and our expectations of them.

The Social Way Policy guides our upstream activities including employees, contractors and suppliers. This is applied at De Beers Group managed operations in South Africa and Canada, as well as mining operations in our joint ventures in Botswana and Namibia, throughout their lifecycle. The policy underscores our human rights commitment and is underpinned by core social performance management principles based on international reference standards. It also sets out Anglo American's vision and principles for social performance, defines our system for social performance management through the Social Way Toolkit and provides a high-level overview of its requirements.

We measure our progress on implementing the UNGPs in several ways, including through our Social Way assessments, our BPP Programme on-site verification visits, security effectiveness reviews, and our RJC recertification process.

In 2023, the following policies and standards underpinned our approach to managing modern slavery risk:

### **Across our Group**

- [The De Beers Best Practice Principles Assurance Programme](#)
- [De Beers Responsible and Ethical Sourcing Policy for Diamonds](#)
- [De Beers Responsible Sourcing Policy for Precious Metals, Minerals and Gemstones \(excluding Diamonds\) for Use in Jewellery Products](#)
- [Workplace Human Rights Policy](#)
- [Security Services and Human Rights Policy](#)
- [Social Performance Policy](#)
- [Whistleblowing Policy](#)
- [De Beers Code of Conduct](#)

### **Upstream Activities**

- [Anglo American Social Way 3.0](#)

### **GemFair:**

- [GemFair Responsible ASM Assurance Programme Standard Requirements, Manual Assessment Surveys and Third Party Management System Audit](#)
- [GemFair Policy for Sourcing from Conflict-Affected and High-Risk Areas](#)
- [GemFair Whistleblowing Policy and Procedures](#)

### **Element Six:**

- Element Six Human Rights Policy
- [Element Six Policy on Responsible Global Supply Chain of Minerals and Metals from Conflict-Affected and High Risk Areas](#)
- [Element Six Code of Conduct](#)

### **Lightbox:**

- Lightbox Business Integrity Standards
- Lightbox Minimum Requirements for Supplier Engagement

### **Supply chain management:**

- [Anglo American Responsible Sourcing Standard for Suppliers](#)

## BUILDING FOREVER™

We are committed to driving the diamond industry forward in everything we do – working to create a brighter future for our people, our planet and the communities around us.

We recognise the role we can play to improve the lives of people along a diamond's journey and to protect the natural world. This has inspired our "Building Forever" ambitions – our sustainability framework that aims to create a positive and sustainable impact that will endure well beyond the discovery of our last diamond.

At the heart of Building Forever, there are 12 ambitious goals that we have set out to achieve by 2030. These goals concentrate on four clear pillars where we believe we can make a meaningful impact:

- Leading Ethical Practices Across Industry
- Partnering for Thriving Communities
- Accelerating Equal Opportunity
- Protecting the Natural World

Human rights are a critical foundation underpinning all Building Forever goals and we will continue to recognise the importance across the value chain.

Learn more about the Building Forever goals [here](#).

## PROGRAMMES AND PROCESSES TO SUPPORT RISK ASSESSMENT AND DUE DILIGENCE

We take a risk-based approach to ensure that high standards of business integrity are upheld, and we have a number of programmes that support our ability to identify and mitigate risks (including modern slavery risks) in our own businesses and supply chains, as well as in our value chain.

### ACROSS OUR GROUP AND VALUE CHAIN

#### THE BEST PRACTICE PRINCIPLES ASSURANCE PROGRAMME

The [BPP Programme](#) consists of a set of mandatory environmental, social (including human rights) and ethical standards that we apply to all our own operations<sup>5</sup>, including entities and their relevant subsidiaries providing contracted services to our Group (including jewellery manufacturing contractors for our house brands), and Sightholders (our contract rough diamond customers). In addition, substantial diamond contractors (those that derive more than 75% of their revenue from a Sightholder) are required to participate in the Contractor BPP Programme, and all non-substantial contractors<sup>6</sup> must be declared to us.

The BPP Programme requires that every BPP participant has policies and procedures in place to help ensure respect for human rights and prevent modern slavery. Where relevant, due diligence, risk assessments and training are required to be implemented as part of these policies and procedures. If child labour; forced labour and/or the abuse of human rights are identified or suspected in our business or in our supply or value chains, it is considered to be a material breach of the BPP and participants are required to take immediate measures to ensure that they are addressed in a rights-compatible manner. This includes enforcing applicable contractual rights and potentially imposing sanctions, until corrective actions have been implemented.

---

<sup>5</sup> Participation in the BPP Programme excludes Element Six businesses.

<sup>6</sup> Contractors deriving less than 75% of their revenue from a Sightholder.

The BPP Programme consists of an annual, three-step assessment process:

- All relevant entities are required to complete a self-assessment workbook, recording their level of compliance against each applicable BPP requirement.
- An independent third-party verifier, SGS, is employed to conduct on-site verification visits. SGS annually visits up to 10% of all entities in scope per organisation.
- One third of all self-assessment workbooks are assessed through a desktop audit.

All Sightholders before they are onboarded are required to provide information on corporate structures along with details of Key Individuals that enables De Beers Group to undertake Know Your Counterparty (KYC) due diligence processes that encompass enquiries relating to forced labour and human trafficking violations.

The results of the BPP Programme assessment process are reported on an annual basis in our 'Building Forever: Our Journey' report, found [here](#). Further information on the BPP Programme can be found [here](#).

## Update on Progress

During 2023, key updates to the BPP Programme included:

- The Human Rights section of the BPP Requirements have been reviewed and revised, to ensure a closer alignment to the language and expectations of international human rights standards, such as the United Nations Guiding Principles (UNGPs), International Labour Organisation (ILO) standards and the Universal Declaration of Human Rights (UDHR). The new requirements also entail greater scrutiny of the risks for vulnerable people, (including indigenous peoples, women, national/ethnic/religious minorities, children, LGBTQ+ people, people with disabilities, and migrant workers).
- In recognition of the importance of climate change impacts across our value chain, we upgraded our Carbon Footprinting reporting requirements from voluntary to mandatory for all Sightholders.

In addition, throughout 2023, we have carried out a review of our requirements relating to Non-Discrimination, Harassment, Bullying and Disciplinary Procedures to continue to reflect best practice and ensure that appropriate mechanisms and procedures are in place (such as risk assessments to address all forms of discrimination, bullying, harassment and/or violence). These new requirements will be rolled out during the 2024 cycle.

## Effectiveness and Key Performance Indicators (KPIs)

During the 2023 BPP cycle, which ran from 1 January 2023 to 31 December 2023, the BPP Programme covered 306,654 employees in 2,637 entities across 77 countries<sup>7</sup>. 124 verification visits took place, and 188 desktop reviews were conducted by SGS across all BPP Programme participants, including applicable parts of our Group.

### Within our business

A total of 54 self-assessment workbooks were submitted across the De Beers Group, 10 desktop reviews and 16 onsite visits were conducted during the 2023 BPP cycle. These have been rated in accordance with the BPP Programme requirements and resulted in no infringements being identified.

Our Group is also certified against the revised 2019 RJC Code of Practices standard, with re-certification achieved in 2021. The 2019 Code of Practices, as well as the BPPs, include requirements on responsible sourcing aligned to the OECD Guidance as well as on modern slavery, and therefore our re-certification importantly means we demonstrated full compliance with these requirements. More details on our responsible sourcing practices can be found at page 13 of this Statement.

During 2022, a Major Infringement was identified at one of our operations concerning the BPP requirements on non-discrimination and disciplinary procedures. This infringement was escalated to BEREC Co and an independent investigation was commissioned to examine the issue and assist in the development of an appropriate and effective corrective action plan. In 2023, we worked closely alongside other key functions within De Beers Group to support employees, implement training and address systemic issues that were

---

<sup>7</sup> 2023 data from the De Beers Building Forever Report: Our Journey.

identified at this operation. The entity was included again in this year's onsite audit selection, which confirmed that appropriate corrective action had been taken, allowing the site to receive a "Compliant" rating.

### Within our value chain

During the 2023 BPP cycle, 178 workbooks were reviewed and rated in accordance with the BPP Programme requirements across our value chain participants. In addition, 108 verification visits were completed based on the sampling requirements defined above. These included audits undertaken at Sightholders' non-substantial contractor sites involved in manufacturing melee diamonds.

Non-compliance with the BPP Programme requirements within our value chain relating to human rights, of which modern slavery and human trafficking are key elements, are listed below:

Human Rights Indicators	2023	2022	2021
Total number of Improvement Opportunities <sup>8</sup> identified under Child Labour/Forced Labour/Human Rights (including Responsible Sourcing)	10	29	13
Total number of Minor Infringements <sup>9</sup> identified under Child Labour/Forced Labour/Human Rights (including Responsible Sourcing)	6	24	24
Total number of Major Infringements <sup>10</sup> identified under Child Labour/Forced Labour/Human Rights (including Responsible Sourcing)	12	11	6

One of the key aspects of both our [Responsible Sourcing Policy for Diamonds](#) and [Responsible Sourcing Policy for Metals and Minerals](#) is to ensure that all suppliers and/or jewellery manufacturers for our downstream brands either participate in the BPP Programme or certify against the RJC's Code of Practices.

One jewellery manufacturing contractor, onboarded in late 2022, received its first on-site audit through the BPP Programme in 2023. The audit identified 12 Major Infringements, five of which related to social requirements. No instances of human rights or modern slavery were identified on the premises.

Whilst it is not unusual that Major Infringements are identified during new participants' first on-site audits, the high number of infringements identified in this instance led to the contractor becoming "Non-Compliant". As part of our management systems, BERCO was informed of the infringements identified and plan to continue to support our contractors on their journey of continuous improvement towards best practice. Three Major Infringements were also identified at another contractor site, manufacturing jewellery for De Beers Forevermark. The infringements related to the lack of policies and procedures to prevent child labour, modern slavery and protection of human rights; however, no indication of human rights abuses or modern slavery emerged during the onsite audit and workers interviews. By the end of the 2023 cycle, the contractor submitted acceptable Corrective Action Plans and evidence to close all the findings.

The remaining Major Infringements related to our section on responsible sourcing, specifically regarding a sourcing policy not being in place at two audited Sightholder entities and no grievance mechanism in place to specifically address sourcing queries in line with the requirements of the OECD Guidance.

<sup>8</sup> An Improvement Opportunity is not a compliance issue if a satisfactory solution is found and implemented during the course of an annual assessment cycle. They are also identified as areas of continuous improvement that go beyond best practice.

<sup>9</sup> A Minor Infringement is any compliance issue that (a) can be rectified within a short period and (b), if managed responsibly, is not deemed by the assessors or independent verifiers to result in any adverse impact.

<sup>10</sup> A Major Infringement is any compliance issue that (a) can be rectified within a reasonable period and (b), if managed

responsibly, is not deemed by the assessors or independent verifiers to result in significant adverse impact. This is in contrast to a Material Breach which relates to any serious non-compliance issue that contravenes the core BPP Programme (including adverse impact on human rights and the use of child labour or forced labour). No Material Breaches have been identified within these human rights indicators to date.

The below table lists the overall number of Major and Minor Infringements<sup>11</sup> identified at our Sightholder operations (including their applicable contractors) and at our Group's jewellery manufacturing contractors across all our BPP requirements (including those pertaining to human rights requirements):

Overall number of Major and Minor Infringements (consolidated)	2023	2022	2021
Business Responsibilities	<b>44</b>	<b>58</b>	<b>38</b>
Social Responsibilities	<b>82</b>	<b>93</b>	<b>113</b>
Environmental Responsibilities	<b>3</b>	<b>7</b>	<b>2</b>

## PIPELINE INTEGRITY PROGRAMME

Pipeline Integrity (PI) is our third-party assured programme focused on the implementation of vigorous management systems, controls, training, documentation, procedures and policies that help to demonstrate that the relevant pipeline is segregated fully, is tracked and traced, and contains only eligible diamonds.

Evidence of how eligible diamonds are tracked through the value chain from rough to polished until the relevant end point is underpinned by the De Beers Diamond Pipeline Integrity Specification 001:2023. Only participants who have been assessed against the Diamond Pipeline Integrity Specification 001:2023 and who clearly demonstrate compliance with the BPPs are eligible to participate in De Beers Provenance Programme activities.

While PI is predominantly an assurance programme focused on the segregation of eligible and non-eligible diamonds, the audit framework sits alongside, and requires participants to comply with the BPPs, meaning during PI only audits the auditors will also verify that entities consistently uphold the BPP requirements relating to child labour, forced labour, human rights, employment, and health and safety. The standard includes an obligation on authorised De Beers Provenance Programme participants to participate in the BPP Programme, in addition to requirements from a responsible business practices perspective, including supplier due diligence relating to modern slavery risks.

PI participants must disclose to us all entities, including contractors, within their group handling eligible diamonds and are subject to an annual PI third-party verification.

In 2023, no instances of forced labour or issues relating to modern slavery requirements or related risks were identified through the PI Programme.

## RESPONSIBLE SOURCING OF DIAMONDS, PRECIOUS METALS, MINERALS AND GEMSTONES

All diamonds and precious metals, minerals and other gemstones sourced by the De Beers Group's business units must meet our robust responsible sourcing practices, which require human rights due diligence to be undertaken on suppliers. This is to provide assurance that the diamonds, metals, minerals and gemstones used in our jewellery have not been sourced in ways which give rise to concerns of human rights impacts, conflict and modern slavery.

These practices are governed by our [Responsible and Ethical Sourcing Policy for Diamonds](#) and our [Responsible Sourcing Policy for Metals and Minerals](#) which are fully aligned to the OECD Guidance. Both policies are designed to ensure that risk-based due diligence is undertaken for all sourcing activities of diamonds and other metals, minerals and gemstones to identify, mitigate and address key risks, including on human rights (including modern slavery), as they have been identified in the OECD Guidance. The policies set out fundamental principles which are applicable to all our diamond-sourcing business units. These include, but are not limited to, our position that we will not tolerate any form of torture, cruel, inhuman and degrading

<sup>11</sup> Infringements can be either Major or Minor and indicate where an issue has been identified that does not meet the BPP requirements and Corrective Action is required. Minor Infringements are where Corrective Action can be taken within a reasonably short time period. Major Infringements are imposed for more serious compliance issues and require Corrective Action to be taken within the BPP Cycle.

treatment, compulsory or forced labour, including child labour, and gross human rights violations in the sourcing of our diamonds, precious metals, minerals and other gemstones.

Following a review in 2022 of both policies, a key focus in 2023 has been to continue working alongside our De BeersGroup entities to ensure the policies are implemented fully and, where necessary, the required assurance protocols and procedures are followed.

- For our downstream (retail) brands, the focus has been on training the relevant teams and gathering the required assurances that suppliers and jewellery manufacturers are compliant with the relevant sourcing requirements, including implementing a procurement decision-making process to assess whether natural rough and/or polished diamonds can be accepted into our supply chain.
- In addition, an in-depth review has been undertaken in 2023 of the Exceptional Diamond Sourcing Protocol of our Responsible and Ethical Sourcing Policy for Diamonds, to continually endeavour to ensure that, when exceptional diamonds are sourced, there is a clear, risk-based due diligence process to evidence the fact that they come from sources that meet the highest ethical and social responsibility standards. This review incorporates extensive due diligence to ensure that none of the third-party producers or mines we source exceptional diamonds from are linked to any potential or actual human rights risks, including those related to modern slavery.

Our Group is further committed to transparency efforts that help to ensure, and evidence, confidence in our diamond, metal, mineral and gemstone sourcing across the diamond and jewellery value chains. Therefore, we published our progress on the implementation of our policies across the relevant parts of the Group in the 2023 'Building Forever, our Sustainability Report', available [here](#).

## VOLUNTARY PRINCIPLES ON SECURITY AND HUMAN RIGHTS

Security is critical to our business, in particular because of the high value of diamonds. We are signatories to the Voluntary Principles on Security and Human Rights (VPSHR), ensuring that we follow human rights best practice when addressing any security-related issues. All security personnel and private contract security personnel receive training in how to respect human rights. Our security and human rights training curriculum, developed jointly with Anglo American and the NGO International Alert, (one of the world's leading peacebuilding organisations), covers all aspects of the VPSHR. It is delivered to our relevant contractors and employees via e-learning modules that have been rolled out across our Group. All private contract security entities are required to pledge their support to the VPSHR, and their personnel are subject to the same in-house training as our own security personnel. Regular interaction with public security occurs in line of our stakeholder engagement plans and discussions in support of the VPSHR is noted.

The Social Way Policy requires that security-related risks and impacts be assessed and managed in accordance with the VPSHR, and IFC Performance Standard 4 on Community Health, Safety and Security.

### Update on Progress

We maintained our strong human rights due diligence process during 2023 to comply with the VPSHR. This included promoting awareness through cross-functional training and conducting robust risk assessments to identify and address security-related human rights risks at our relevant operations.

As part of the [Social Way](#) 3.0 framework, our managed and joint ventured land mine sites undertook annual Social and Human Rights Impacts and Risks Assessment (SHIRA) workshops that further expanded on human rights matters across the upstream natural diamond pipeline, with concerted, cross-functional efforts to identify data gaps with regards to impacts and risks, including in the security sphere. The application of a human rights lens continues to strengthen our governance process across our business.

# AT OUR UPSTREAM OPERATIONS

## SOCIAL WAY 3.0

The Social Way is our social performance management framework for our land-based mining operations. It sets out the requirements each mining site needs to implement on an ongoing basis to identify and address social performance impacts and issues. The Social Way explicitly links effective social performance with respect for human rights. This is embedded into its requirements (specifically those related to social and human rights risks and impact assessment, stakeholder engagement, understanding and addressing concerns of vulnerable groups and addressing grievances) and in our work with contractors, including our approach to security.

The Social Way Toolkit contains detailed guidance on the standards, processes and procedures required for effective social performance and implementation of the Social Way Policy. It provides guidance on how to conduct a Social and Human Rights Impacts and Risks Assessment (SHIRA), which incorporates the 'principles and objectives' of human rights due diligence as set out in the UNGPs. One of the categories of impacts that are included in the SHIRA process is impacts on personal and political security, which includes impacts on the right to freedom from slavery and forced and child labour.

Community engagement and local accountability are central to the Social Way. It sets out requirements for stakeholder engagement in support of SHIRA and the management of grievances and incidents, in human-rights related matters including community health and safety, livelihoods and job creation, access to education and land access, displacement and resettlement.

During 2023, our Snap Lake, Voorspoed and Victor mines, which ceased production in 2015, 2018 and 2019 respectively, continued with the implementation of their closure plans that are aligned with the Social Way 3.0 as well as Anglo American's Mine Closure Toolbox.

### Update on Progress

Our updated social performance management framework, [Social Way 3.0](#), for our land-based mining operations, was launched in January 2020. Operations are assessed annually to determine compliance with, and identify gaps in respect of, the requirements of the Social Way. We are aiming for all our mining operations to achieve full compliance with its requirements by the end of 2025.

The framework is made up of a number of foundational requirements which are compulsory for all active land-based mining operations. The foundational requirements set standards on topics such as human rights risk and impact analysis, and incident and grievance management, amongst others.

Sites are required to implement grievance management procedures, and all grievances must be screened. As stated in the Social Way Toolkit, site-level mechanisms should follow the effectiveness criteria for operational-level grievance mechanisms in the UNGPs. External stakeholders, including contractors, can report grievances and incidents that have a social consequence through a site-level mechanism. One of the categories of incidents that can be reported is personal and political security, which includes incidents related to the right to freedom from slavery, forced and child labour, and debt bondage. Grievances and incidents of a higher social consequence level must be investigated and closed-out.

As well as the foundational requirements, there are certain risk-based requirements that are compulsory for all active land-based mining operations. These include full adherence to the VPSHR and contractor social management, amongst others. In addition, there are a number of context-specific requirements, for example, those relating to indigenous peoples, conflict management and site-induced migration.

Two of the compulsory requirements outlined above relate specifically to human rights due diligence, and the [Social Way Toolkit](#) provides extensive guidance and templates to support operations with their implementation:

- [Requirement 3C](#). Social & Human Rights Risk and Impact Analysis
- [Requirement 4E](#). Voluntary Principles on Security and Human Rights

Given that our marine-based diamond recovery operations do not impact specific host communities in the same manner as land-based mining operations, the majority of the Social Way requirements are not



applicable. However, during 2021, our joint venture marine diamond recovery operations in Namibia began implementing requirement 3B (Incident & Grievance Management) and 3C (Social & Human Rights Risk & Impact Analysis) as part of their existing risk assessment and due diligence processes. In 2022, the marine-based diamond recovery operations also began implementing requirement 3A (Stakeholder Engagement).

A version of the Social Way adapted to mining exploration is being applied in our Angola exploration operations and will be scaled up and assessed as appropriate to the scale of activity and impact in those areas. All requirements were assessed at the end of 2023 and the findings will be incorporated into the sites' updated transition plans in Q1 2024. None of the findings identified related to modern slavery risks.

## AT OUR MIDSTREAM OPERATIONS

### GEMFAIR RESPONSIBLE ARTISANAL AND SMALL SCALE MINING ASSURANCE PROGRAMME

GemFair, which sources rough diamonds from artisanal and small-scale mining (ASM) miners, continues to use its own GemFair Responsible ASM Assurance Programme for responsible sourcing, which draws its structure, scope and intent predominantly from the:

- OECD Guidance
- BPP Programme
- Alliance for Responsible Mining and RESOLVE's CRAFT Code
- Diamond Development Initiative's (DDI) Maendeleo Diamond Standards

GemFair's Responsible ASM Assurance Programme is a group of policies, procedures, standards and training fulfilling the OECD Guidance requirements for responsible sourcing in mineral supply chains. These include, but are not limited to, undertaking risk assessments for forced labour, human trafficking, human rights violations and child labour. Any observation or verified reports of the above material issues would lead to GemFair's disengagement from the individual or business. GemFair also undertakes KYC due diligence on potential and existing substantial suppliers (as determined by value).

The GemFair ASM Assurance Programme works to ensure there is no forced labour, child labour, conflict, violence or other human rights violations at the participant mining sites, in line with OECD due diligence guidance, and that they provide good standards of labour practices, environmental management, and health and safety. GemFair has a permanent buying office in Sierra Leone, and a national team in charge of the on-the-ground delivery of the programme, such as onboarding miners, carrying out background checks and visiting sites to monitor compliance

GemFair's assessment process with artisanal miners includes:

- Baseline risk assessment at their site and of GemFair's records to assess for any material risks.
- Corrective action measures implemented where required, including remedial training and action plans.

In addition to the Responsible ASM Assurance Programme, GemFair:

- Distributes a Fair Mining Policy to miners and includes a section on forced labour and human trafficking. In addition, miners receive training on these topics.
- Requires each of its suppliers to sign a self-declaration to adhere to GemFair's Core Requirements, which include human rights and forced labour standards.
- Has developed a policy on sourcing from conflict-affected and high-risk areas to demonstrate its commitment to following the five-step framework as articulated in the OECD Guidance. The policy details how GemFair addresses supply chain risks (including modern slavery risks) related to sourcing ASM diamonds from either a conflict-affected or high-risk area.
- Monitors participating artisanal diamond mine sites on a regular basis and provides remedial training where miners are not meeting the relevant GemFair standards.

GemFair's programme is verifiable, and its due diligence management system is third-party assured by SGS, which includes auditing a sample of mine sites selling to GemFair. The first audit took place in 2019 and subsequent audits took place in 2020, 2022 and 2023.



## Update on Progress

In 2023, GemFair continued to monitor modern slavery risks in the supply chain. This included:

- **Mine site assessments:** Continual mine site assessments carried out by trained field officers to monitor for any human rights /child labour/ forced labour issues at participating mine sites. The field team undertook 1,133 mine site assessments this year.
- **Background checks:** GemFair conducted background checks on every new diamond supplier to ensure that GemFair does not engage with individuals on sanctions lists, with a total of 121 checks in 2023. Training: After onboarding, GemFair diamond suppliers receive training on GemFair's Core Standards, which cover modern slavery risks and how they manifest at artisanal mine sites. This year, representatives from 284 mine sites received GemFair's Core Training course.
- **GemFair membership pilot:** GemFair expects to identify feasible and responsible ways to build an even more inclusive GemFair programme that is accessible to a greater number of miners. This is because, after five years implementing the programme, GemFair has determined that Kono's artisanal diamond mining sector (where GemFair mines are located) at low risk for modern slavery. In 2023, GemFair piloted a new membership category that enables licensed artisanal diamond miners to join the GemFair programme earlier. This pilot was rolled out to 47 mine sites that, after passing GemFair's background checks, they were eligible to sell their diamonds. GemFair staff carried out post-purchase spot checks at the mine sites and no modern slavery risks were identified.

## DE BEERS AUCTIONS

De Beers Auctions predominantly sells rough diamonds sourced from our managed and joint venture mining operations, but as part of its business model, it also sources third-party rough diamonds from approved producers, in line with our [Responsible Sourcing Policy for Diamonds](#). Diamonds from third-party producers are always kept segregated from our Group's production and are sold as separate lots. This has been verified through a provenance claim we had certified in 2021 as part of our Group's RJC re-certification and is underpinned through De Beers Auctions' participation in the PI Programme, which began in 2021 and covers all eligible De Beers Auction entities.

## Update on Progress

De Beers Auctions continues to be bound by our [Responsible Sourcing Policy for Diamonds](#).

When De Beers Auctions opts for third-party sourcing, it will continue to ensure that it only purchases diamonds from approved sources that meet our strict ESG criteria, as outlined in the above-mentioned policy. Verification against the implementation of the policy and its supporting processes is undertaken through independent third-party BPP audits. All procedures relating to third-party diamond procurement are clearly defined in a third-party Supply Operating Model, and training on the same is provided to relevant employees to ensure they are made aware of any updates or revisions to both our policy and any supporting documents.

In 2023, De Beers Group Auctions only sourced rough diamonds produced at De Beers' managed and joint venture mining operations.

# AT OUR DOWNSTREAM OPERATIONS

## (De Beers Forevermark and De Beers Jewellers)

As articulated in our [Responsible Sourcing Policy for Diamonds](#) and [Responsible Sourcing Policy for Metals and Minerals](#), our consumer brands, De Beers Jewellers (DBJ) and De Beers Forevermark, adhere to a strict set of Fundamental Principles, aligned to the OECD Guidance, when undertaking any sourcing activities. These two policies combined reflect the significance and importance we place on our downstream diamond operations managing and mitigating risks related to the sourcing of diamonds and other precious metals and minerals.

### DE BEERS JEWELLERS

In alignment with both Responsible Sourcing Policies, DBJ's core diamond suppliers and jewellery manufacturers continue to comply with our strict ethical and sourcing criteria:

- All core white diamonds are sourced from De Beers Group's managed and joint venture operations, and all suppliers of this category of diamonds are required to be compliant with the BPP Programme and PI Programme (more information on both programmes can be found above).
- In special circumstances, DBJ may source exceptional diamonds from other approved sources. All approved sources are selected based on robust Environmental Social Governance (ESG) criteria, including those relating to human rights, forced labour and risks of modern slavery. Strict due diligence on the supplier's integrity and sourcing practices is also in place for approved sources, including due diligence aligned with the OECD due diligence framework.

#### Update on Progress

All jewellery manufacturers for DBJ are required to be compliant with either the BPP Programme or be certified against the RJC Code of Practices.

- In 2023, 94 per cent of our jewellery manufacturers met this criterion, with 37 per cent participating in the BPP Programme and 57 per cent being RJC COP-certified. Two jewellery manufacturers accounted for the remaining six per cent and they have committed to joining the RJC as members. We aim to ensure full alignment for 100 per cent of jewellery manufacturers in 2024.
- In 2023, all jewellery manufacturing contractors for DBJ participating in the BPP Programme were assessed as compliant and no infringements were identified relating to human rights or modern slavery.

In terms of its platinum sourcing, over the course of 2023, DBJ aimed to source 100% of its newly mined platinum from Anglo American Platinum, which holds a Responsible Platinum and Palladium Certificate from the LPPM (London Platinum and Palladium Market) and is aligned to the highest standards of human rights through its compliance with the LPPM Responsible Sourcing Guidance, version 4. This ensures that, via an audited process, all the metals produced by Anglo American Platinum are conflict-free. The remainder of DBJ's sourcing of platinum in 2023 was from recycled sources. DBJ will continue to aim to source 100% of its newly mined platinum from Anglo American Platinum in 2024, with recycled platinum fulfilling any shortfalls. In addition, work will continue in 2024 to support more robust data collection on manufacturers' platinum suppliers to better understand provenance and impact.

### DE BEERS FOREVERMARK

All De Beers Forevermark Diamantaires are Sightholders and therefore participate in the BPP Programme. They are also required to participate in the PI Programme.

As of 1 January 2023, all De Beers Forevermark diamonds inscribed with the logo originate in rough form from our Group's managed or joint-venture diamond mining operations only.

#### Update on Progress

The focus for 2023 was to continue ensuring De Beers Forevermark jewellery manufacturers met the strict ethical credentials stipulated within our Responsible Sourcing Policy for Metals and Minerals, including participating in the BPP Programme where they are not RJC certified members.

- No new jewellery manufacturers for De Beers Forevermark were onboarded to our BPP Programme in 2023 and two were removed due to low orders
- Those jewellery manufacturers which were onboarded to the BPP Programme in 2022, continued their participation during the 2023 cycle. Major Infringements relating to social requirements were identified at one jewellery manufacturing contractor, which were all promptly addressed with adequate evidence of corrective action being provided. No Major Infringements were identified at any of the other jewellery manufacturers. For more details, please refer to page 12.

## AT OUR OTHER BUSINESSES

### ELEMENT SIX

Element Six continues to fulfil its obligations under the EU and US Conflict Mineral regulations, that seek to prevent the financing of armed groups, and sourcing of minerals tin, tantalum, tungsten and gold from mines using forced labour or engage in human rights abuses. Element Six's Conflict Minerals Policy can be viewed [here](#).

#### Update on Progress

Element Six had no issues in its results of the independent third party annual audit of tungsten carbide suppliers, as per previous years.

Element Six continues to review and develop its supply chain due diligence. During 2023, Element Six rolled out a centralized vetting process for suppliers and customers to ensure they are continually screened against all major legal obligations including modern slavery, sanctions and adverse media. Furthermore, key suppliers were audited via self-assessment questionnaires to get an in-depth understanding of their compliance programmes.

### LIGHTBOX

Lightbox continues to apply its suite of procedures applicable to its significant contractors and suppliers, both before and after a business relationship is formed. Prior to the relationship being formed, contractors and suppliers must meet minimum due diligence requirements. These checks include ensuring no red flags are identified relating to risks such as modern slavery or human rights abuses, amongst other ethical social and business practices, across the suppliers' and contractors' operations. Once the relationship is formed, suppliers commit to participating in, and being compliant with, an annual third-party assurance programme which has robust requirements on business, environmental and ethical standards, including those which seek to mitigate the risks of modern slavery.

#### Update on Progress

Throughout 2023, Lightbox's three core jewellery manufacturing contractors continued to be assessed annually against our ethical business, social and environmental practices, which include human rights and human trafficking requirements. One Major Infringement was identified at one of the contractors, which did not relate to social requirements and was successfully and promptly closed with submission of a suitable Corrective Action Plan. Another contractor, onboarded in late 2022, received a "Non-Compliant" status due to 12 Major Infringements being identified during their first on-site audit and De Beers Group and Lightbox are actively working with the contractor to ensure appropriate corrective action is taken. For more details please see page 12.

### TRACR

#### Update on Progress

Tracr continues working with platform participants that are active in various stages of the diamond value chain, to identify and respond to human rights risks. In 2023, Tracr opened up to the wider industry, with a number of prominent marketplaces and laboratories joining the platform, including The Gemological Institute of America

(GIA) and Gemological Science International (GSI). Across the midstream, all Tracr platform participants are Sightholders, and therefore fall under existing due diligence and assurance processes. De Beers Group is the only rough diamond producer on the platform and is therefore subject to the applicable assurance processes described above.

The expectation for 2024 is to extend participation beyond De Beers Group to other producers, and beyond Sightholders to include other participants from midstream. All new participants will be required to be RJC members, whose Code of Practices extensively covers requirements for identifying and mitigating against potential modern slavery risks in the RJC member's operations and its suppliers.

## INSTITUTE OF DIAMONDS

The Institute of Diamonds (IoD)'s services are offered to diamantaires across the diamond industry, and whilst the IoD does not obtain ownership of any diamonds it receives, the majority of these customers are Sightholders who therefore fall within existing due diligence processes, which seek to identify and respond to modern slavery or human rights risks.

### Update on Progress

The process adopted by the IoD for managing modern slavery risks remains unchanged.

For customers who are not Sightholders, they are still required to provide the IoD with relevant corporate information so that due diligence checks can be conducted. This information is input into third-party screening platforms which identify red flags, including those relating to modern slavery and human rights. Only upon these checks being completed will the IoD offer its services to any prospective customer.

## BEYOND OUR BUSINESS

### SUPPLY CHAIN MANAGEMENT

The products and services that are used to support our global upstream mining operations are predominantly sourced in Botswana, Canada, Namibia, and South Africa, in recognition of the importance we place on developing and maintaining thriving and healthy host communities. Additionally, we are committed to working with suppliers who comply with applicable laws, while striving for 'zero harm' to people, society, and the environment. This commitment ensures that we work with responsible suppliers whilst remaining committed to supporting suppliers to identify and manage sustainability issues such as those relating to safety, human rights, modern slavery, and workplace conditions.

Our supplier-base is wide and diverse, comprising a growing number of small and medium-sized localised suppliers in the countries in which we have operations. Procurement of goods, labour and services available in our countries of operation is of strategic importance to us because it plays a key role in developing thriving and healthy host communities.

In South Africa, our inclusive procurement (where preference is given to Black owned enterprises; women owned enterprises; youth owned enterprises; or suppliers located in the host communities) increased to 76% in 2023 from 71% of total addressable spend during 2022. This increase can be attributed to inflationary factors, as well as the investments for the ramp-up phase at Venetia underground operations.

In 2023, we procured goods and services worth approximately \$1 billion from over 1,537 suppliers for South Africa and 599 suppliers for Canada.

### Update on Progress

De Beers Group Supply Chain actively supports the Anglo American Supply Chain function's journey to 'Innovate Supply, Responsibly' which is being delivered through outcomes focusing on safety, people, sustainability, value delivery and digitisation. All upstream suppliers are expected to adhere to the expectations as set out in the Anglo American Responsible Sourcing Standard.

Fundamental to this approach is the prioritisation of ethical decision-making when purchasing goods and services. This prioritisation is embedded within the Anglo American Responsible Sourcing Standard alongside five key expectations for suppliers:

1. Protect safety and health
2. Protect the environment
3. Respect labour and human rights
4. Increase social accountability
5. Conduct business fairly and with integrity

The Responsible Sourcing programme focuses on selecting suppliers annually to assess their compliance with applicable laws and fair and transparent business practices. Suppliers are selected to participate in the programme based on spend, impact on host communities and/or any other risks which may be brought about by contractors with a large staff complement. In 2023, 143 top-spend suppliers from South Africa and Canada were engaged as part of the Anglo American Responsible Sourcing Programme.

The requirements contained in the Anglo American Responsible Sourcing Standard are non-negotiable and reflect our commitment to ensure fair and transparent business practices and to use our influence with suppliers to effectively manage those risks. All engagement with suppliers will continue in 2024 to help ensure we continue to monitor and manage any changes within our upstream supplier risk profile and identify any new risks that may emerge because of these changes.

Update on De Beers Group Supply Chain programme in 2023:

- Informed365 platform allows for all suppliers to complete the Anglo American Responsible Sourcing Programme self-assessment questionnaire (SAQs). All responses are scored and rated to provide a risk rating for each supplier (including on indicators of modern slavery risks).
- Currently, 143 suppliers are part of the Anglo American Responsible Sourcing Programme for 2023. Of those 91 (20% Canada and 80% SA suppliers) have responded and completed their SAQs, and further risk analysis has been scheduled for 2024.
- As of March 2024, zero upstream suppliers have been identified as high risk. However, if a supplier is identified as a high risk, De Beers Group would engage with the supplier to address the risks and ensure that a corrective action plan would be concluded. Tracking of actions would take place with possible onsite audits where required.
- Based on this analysis, and where applicable, Corrective Action Plans (CAPs) with realistic timeframes for monitoring and close out of issues identified will be requested from suppliers. This will help to ensure that potential risk events are managed and mitigated accordingly. The purpose of the CAPs is to ensure that any supplier non-conformances that may impact our Group are proactively remedied before a risk event can materialise.
- The results from completed SAQs confirmed that large spend suppliers understand responsible sourcing risk areas and have established practices to manage key risks, including those related to human rights and modern slavery. In addition, key findings showed that none of the suppliers concerned had any investigations for corrupt, illegal, unethical or anti-competitive practices over the last three years, meaning there were no modern slavery findings identified.

To further mitigate the increased possibility of human rights violations, we have continued with human rights and security checks for suppliers:

- Due diligence processes are applied to all new upstream operations suppliers which are aligned to the Anglo American Supplier Life-Cycle standard. These due diligence verifications include trade sanctions and responsible sourcing checks, including child labour and modern slavery checks amongst others, through an independent third-party who conducts the screening and compliance verification for all new upstream mining suppliers. This means that all potential new suppliers are adequately screened, and contracts will only be finalised upon the successful completion of these checks.
- The same due diligence processes were also applied to the top 300 suppliers and intermediaries. These top suppliers were identified based on spend, split between SA and Canada equally. Over and above the top 300 suppliers intermediary entities were included to the sample.

## TRAINING

Whenever possible, we aim to improve our performance through training and capacity building initiatives. Current initiatives available to our employees, contractors and relevant customers in the diamond and (where relevant) synthetic diamond and supermaterials value chains relating to the management of modern slavery risks, are as follows:

### HUMAN RIGHTS TRAINING

A total of 1,186 training hours were devoted to human rights in 2023 across the De Beers Group (1,426 in 2022). The number of people who received training in human rights policies and procedures in 2023 was 1,441 (3,469 in 2022).

### BEST PRACTICE PRINCIPLES TRAINING

Online live training was provided to existing and new BPP participants, including our own business units and our third-party auditors. This included refresher training to provide them with comprehensive guidance on how to implement new and existing (for new participants) requirements in the BPP Programme (covering also extensive requirements on compliance on forced labour, child labour and human rights). 21 training sessions were delivered in 2023.

### GEMFAIR TRAINING FOR ASM MINERS

In 2023, GemFair rolled out nine training sessions on responsible artisanal mining standards (such as human rights, child labour and forced labour prevention), diamond valuation fundamentals and the GemFair traceability solution. Please see our annual [GemFair Way sustainability report](#) for further information.

### TRAINING ON VOLUNTARY PRINCIPLES ON SECURITY AND HUMAN RIGHTS

In 2023, a total of 1275 (1050 in 2022) employees, privately contracted security personnel and members of police services received training (conducted both in-class and e-learning) across all of our operations.

## PLANS TO STRENGTHEN OUR APPROACH IN THE FUTURE

We intend to take the following actions to further strengthen our approach to managing human rights risks, including modern slavery, in our Group and across our value chain over the next 12 months through the following commitments and actions.

### ACROSS OUR GROUP AND VALUE CHAIN

- Throughout 2024, we will work with our De Beers Group entities to re-certify our operations against the Responsible Jewellery Council (RJC) Code of Practices Standard, which we have done since 2012.
- We will continue to evolve our current accepted sourcing standards within the Responsible Sourcing Policy for Diamonds and for Metals, Minerals and Gemstones to ensure the policies continue to adhere to the highest ethical guidelines. We will continue to work closely with all our relevant business units to ensure their commercial practices are implemented in accordance with the policies.
- We will continue to align the BPPs with industry best practices and relevant responsible and ethical business practices assurance mechanisms and regulations. We aim to achieve this in the 2024 cycle through:
  - » Aligning the BPP Requirements with the International Council on Mining and Metals (ICMM)'s Mining Principles for Sustainable Development.
  - » Rolling out stronger requirements on Non-Discrimination, Bullying, Harassment and Disciplinary Procedures, to continue to reflect best practice in this space.
  - » Continuing to ensure the BPP Programme achieves cross-recognition with the RJC's Code of Practices.

### AT OUR UPSTREAM OPERATIONS

- We are aiming for our current mining operations to achieve full compliance against the requirements of Social Way 3.0 by the end of 2025.

### AT OUR MIDSTREAM OPERATIONS

#### GEMFAIR

- In 2024, GemFair plans to integrate the learnings from the 2023 membership pilot into business-as-usual operations, ensuring that the programme is inclusive for eligible artisanal diamond miners. GemFair also looks to expand to more regions.

### AT OUR OTHER BUSINESSES

#### ELEMENT SIX

- Element Six are currently in the process of finding a more user-friendly solution to provide vendor due diligence, which is due to be implemented within 2023. A formal process will subsequently be implemented for onboarding vendors and reviewing any alerts received about vendors once on-boarded.

## LIGHTBOX

- Lightbox will continue applying its robust ethical business and social requirements and formalising this process to clearly define roles, responsibilities, and processes for ensuring corrective actions identified by the third-party auditor are responded to appropriately.
- Lightbox will also continue ensuring that all metal sourced by its jewellery manufacturers is done in accordance with the [Responsible Sourcing Policy for Metals, Minerals and Gemstones](#) and is appropriately recorded.

## BEYOND OUR BUSINESS

### UPSTREAM SUPPLY CHAIN

The objectives for responsible sourcing for the upstream supply chain have been strongly maintained with the existing De Beers Supply Chain governance processes. From the onboarding of our suppliers to the contracts negotiated, extensive reviews have been conducted on our suppliers to ensure compliance with the Anglo American Responsible Sourcing programme.

The following activities are expected to be undertaken in 2024, with ongoing consideration of continuing our current efforts to protect human rights and eliminate modern slavery in line with Building Forever goals:

- Continuing to work with Anglo American to facilitate and enable the delivery of the Responsible Sourcing Standard targets for their upstream suppliers in the 2024 Building Forever 5-year plans for Venetia and Gahcho Kué mines.
- Continue with our efforts to train members of our supply chain teams and relevant business unit stakeholders on responsible sourcing.
- Continue engagement with supply chain leaders in our own managed and joint venture operations in Botswana and Namibia.
- Engage an additional 100 suppliers to complete self-assessment questionnaires (SAQ's).
- Identify two high risk suppliers, post SAQ's, for third party audits.
- Supplier training to close category gaps identified during SAQ's.



DE BEERS GROUP