

DE BEERS GROUP

DE BEERS PLC
UK MODERN SLAVERY ACT
STATEMENT

For the financial year ending
31 December 2024

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Introduction

Statement by CEO

This is the 9th Modern Slavery Statement¹ made by De Beers plc, the parent company of De Beers Group² and its relevant subsidiaries and managed joint ventures, pursuant to section 54 of the Modern Slavery Act 2015 (the Act)³ for the financial year ending 31 December 2024.

Respect for human rights is embedded at all of De Beers Group's operations and within our culture. It is both one of the Critical Foundations of our Building Forever sustainability framework and a commitment we make in our Code of Conduct and 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, supporting our commitment to comply with local legislation and adhere to international labour and human rights conventions. We are committed to preventing modern slavery in our organisation, our supply chains and the wider diamond value chain.

Our Modern Slavery Statement highlights the steps that we have taken to identify and mitigate potential risks of modern slavery in our business and supply chains. During 2024, no incidents specifically relating to modern slavery, forced labour or child labour were identified through our applicable risk management programmes. The Statement provides a detailed update on De Beers Group's business activities and our policies and processes for conducting human rights due diligence to identify modern slavery, forced labour and child labour risks. In addition to explaining how we have assessed the effectiveness of the policies and processes we've implemented; this Statement contains details of training programmes we have used to build awareness of all forms of modern slavery. It also includes an update on progress made during 2024 and our plans to strengthen our approach in 2025.

This Statement was approved by the Board of De Beers plc on 23 July 2025.

Al Cook
Chief Executive Officer



¹ 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](#).

² 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.

³ 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 and Element Six (UK) 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, IIDGR (UK) Limited, Debcore and Charterhouse CAP Limited. The board of each of these entities has approved this Statement.

Adherence to other reporting legislation

A separate statement 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](#).⁴

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 diamonds and supermaterials. De Beers and its managed (and non-managed) joint ventures employ over 21,000 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 LondonTM and ForevermarkTM, and pioneering industry services, such as diamond sourcing and traceability initiatives GemFairTM and TracrTM.⁵

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 our Group, please visit: www.debeersgroup.com.

⁴ For the avoidance of doubt, this Statement encompasses matters relevant to De Beers Canada Inc.

⁵ ForevermarkTM, **DE BEERS** JEWELLERS TM, Building ForeverTM, TracrTM and GemfairTM are Trademarks of De Beers Group. LightboxTM is a Trademark of Lightbox Jewelry Ltd.

Key Updates to our Business

New Agreement in Principle between the Government of the Republic of Botswana and De Beers Group

In 2024, we made good progress on our work to finalise the long-form version of a landmark agreement signed between De Beers Group and the Government of Botswana. Extending Debswana's rough diamond production by 10 years to 2033 and Debswana's mining licences by 25 years through to 2054, the agreement will also enable Botswana to ultimately equalise the share of Debswana's diamonds it sells into the market.

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

Update on Our Mining Operations in Closure

We are completing the closure scope at our Canadian mines, Victor in Ontario and Snap Lake in the Northwestern Territories, in line with regulator approved closure plans. These plans are aligned with the applicable provisions of the Anglo American Social Way 3.0 and the Anglo American Mine Closure Toolbox.

Our Voorspoed Mine in South Africa ended production in 2018 and, in September 2023, the planned decommissioning of the plant infrastructure was completed. In 2024, the mine remains in care and maintenance.

For more information, please see our 2024 ["Building Forever: Our Sustainability Report"](#).

Angola Development

In 2023, De Beers Group began diamond exploration in Angola following two Mineral Investment Contracts signed in 2022. In 2024, a partnership with Angola's mineral agencies strengthened efforts to increase rough diamond production, support alluvial mining, and promote social development. By October 2024, eight high-potential kimberlite targets were identified, with drilling and geophysical surveys underway.

De Beers plans to apply the Building Forever framework in Angola, which has helped to drive sustainable change in Botswana and Namibia, to develop these resources in line 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 De Beers plc level 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 2024 is shown in the below diagram.

The Business, Ethics, Risk and Conduct Committee (BERC Co)

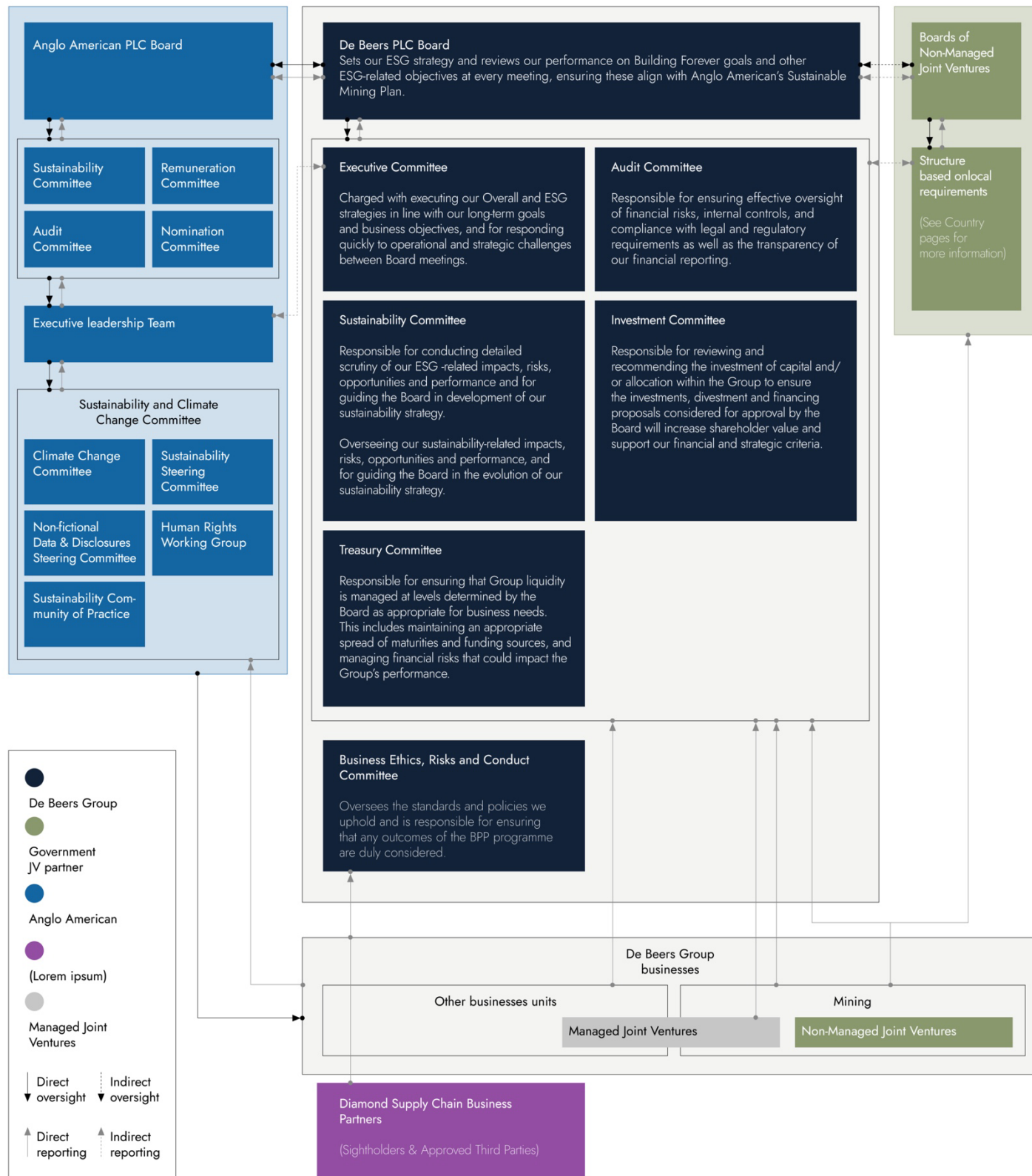
BERC Co (formerly known as Best Practice Principles Committee) is mandated to investigate potential non-compliances with the standards outlined in the Best Practice Principles (BPP) Assurance Programme and the Pipeline Integrity (PI) Programme by any participant in the programmes. The outcomes of such investigations inform subsequent actions. BERC Co also oversees the implementation of the De Beers Group Sourcing Policies for Diamonds and for Metals, Minerals and Gemstones. This includes being accountable for ensuring that any allegations and findings 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 are addressed accordingly by BERC Co.

Sustainability Committee

The Sustainability Committee, which reports into the De Beers plc Board, also has oversight over how potential impacts on human rights are considered and managed within our operations and is updated on the performance of our mining sites against the Anglo American Social Way and the outcomes of the BPP Programme, for both internal and external participants of the Programme.

Governance and Reporting Framework



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).

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 8 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, which in 2024, some 3,043 entities employing approximately 274,248 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 contained in several of our internal policies, including our Code of Conduct, Workplace Human Rights Policy, our Anglo American Group Security Policy and both of our [Responsible Sourcing Policies for Diamonds](#) and for [Precious Metals, Minerals and Gemstones](#).

Along with our internal Workplace Human Rights Policy, we have an 'Introduction to human rights' training, this training is completed via an employee portal and is mandatory for all employees when they join the business and every two years thereafter. The training helps our employees understand what we stand for as a business and our expectations of them.

The Anglo American Social Way Policy guides our upstream human rights risk management activities, covering employees, contractors and suppliers. This is applied at De Beers Group managed operations in South Africa and Canada and has been adopted by mining operations in our joint ventures in Botswana and Namibia. 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 Anglo American 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 2024, the following policies and standards underpinned our approach to managing modern slavery risk:

Across our Group and Value Chain:

- [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](#)
- [Anglo American Group Security 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](#)
- [GemFair Responsible Sourcing Policy for Diamonds](#)
- [GemFair Whistleblowing Policy](#)

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 diamonds being an enabler of a brighter future for our people, the communities around us and the planet.

We recognise the role we can play in seeking 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 meaningful and sustainable impact that is able to endure well beyond the discovery of our last diamond.

During 2024, following the launch of the Group's Origins strategy, we reviewed our Building Forever strategy to simplify its structure, whilst seeking to maximise its impact. We have been challenging ourselves to ensure that our choice of focus areas continues to meet the expectations of our stakeholders as values and expectations evolve; that the resources and effort we invest are able to maximise our impact and drive value, and that we are positioning ourselves for success through compelling storytelling to explain how diamonds have meaningful impacts and drive desirability for natural diamonds.

Aligned with what our stakeholders care about and where we think we can drive the most impact, we are evolving our four pillars into the three key focus areas.

- Climate
- Nature
- Livelihoods

At the heart of our focus areas is provenance, which aims to provide traceability and transparency, demonstrating the journey our diamonds have been on, and the positive impacts they've had along the way.

Building Forever continues to be grounded in core principles that have long underpinned De Beers Group's strategy. We also reviewed and streamlined these principles during the year.

- Beyond Zero is our health and safety framework which aims to make safety inherent in our way of life. We set standards and strive to drive continuous improvement in our own operations and in the communities where we operate.
- Human rights: Respect for human rights is embedded in our business. We require adherence to applicable human rights laws. We conduct human rights due diligence aligned with the United Nations Guiding Principles on Business and Human Rights (UNGPs).
- Inclusion and diversity: We believe an inclusive culture that values diversity supports our business growth and drives innovation. We strive to foster a working environment where people feel empowered to speak freely and can thrive by bringing their whole selves to work.

We expect to transition to report against the new framework from 2025 onwards. Learn more about the Building Forever goals [here](#).

Programmes and Processes to Support Risk Assessment for Due Diligence

We take a risk-based approach to monitoring compliance in our supply chain, maintaining high standards of business integrity. 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,⁶ including entities and their relevant subsidiaries providing contracted services to our Group (including jewellery manufacturing contractors for our house brands), and Sightholders (our term 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 contractors⁷ 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 or the abuse of human rights is identified or suspected in our business or in our supply or in relevant parts of our value chains, it is considered to be a material breach of the BPPs, and participants are required to take prompt measures to ensure that they are addressed in a rights-compatible manner. This includes enforcing our applicable contractual rights and potentially imposing sanctions until corrective actions have been implemented. 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 2024, key updates to the BPP Programme included:

- The non-discrimination section of the BPP Requirements has been reviewed and revised and the title amended to Non-Discrimination, Harassment, Bullying and Disciplinary Practices. The content relating to the characteristics of discrimination, bullying and harassment, the forms of bullying and harassment, and disciplinary and grievance procedures has been clarified to align with best practice. Updates were made to require that appropriate mechanisms and procedures are in place (such as risk assessments to address all forms of discrimination, bullying, harassment and/or violence).

⁶ Participation in the BPP Programme excludes Element Six businesses.

⁷ Contractors deriving less than 75% of their revenue from a Sightholder.

In addition, reference to Covid-19 has been removed from the BPP Requirements and Workbook questions. The health and safety related requirements continue to focus on investigating, controlling and mitigating health and safety risks on workers (including vulnerable people) and impacts of contagious and infectious diseases in the workplace.

Effectiveness and Key Performance Indicators (KPIs)

During the 2024 BPP cycle, which ran from 1 January 2024 to 31 December 2024, the BPP Programme covered 274,248 employees in 3,043 entities across 79 countries.⁸ 124 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 52 self-assessment workbooks were submitted across the De Beers Group, and 17 desktop reviews and 13 onsite visits were conducted during the 2024 BPP cycle. These have been rated in accordance with the BPP Programme requirements.

Our Group is also certified against the revised 2019 RJC Code of Practices standard, [with re-certification achieved in 2024](#). 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 compliance with these requirements. More details on our responsible sourcing practices can be found at page 11 of this Statement.

- Within our value chain

During the 2024 BPP cycle, 189 workbooks were reviewed and rated in accordance with the BPP Programme requirements across our relevant value chain participants. In addition, 113 verification visits were completed based on the sampling requirements set out above. These included audits undertaken at Sightholders' non-substantial contractor sites involved in manufacturing melee diamonds.

Non-compliances 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	2024	2023	2022
Total number of Improvement Opportunities ⁹ identified under Child Labour/Forced Labour/Human Rights (including Responsible Sourcing):	0	10	29
Total number of Minor Infringements ¹⁰ identified under Child Labour/Forced Labour/Human Rights (including Responsible Sourcing):	3	6	24
Total number of Major Infringements ¹¹ identified under Child Labour/Forced Labour/Human Rights (including Responsible Sourcing)	4	12	11
Total number of Material Breaches identified under Child Labour/Forced Labour/Human Rights (including Responsible Sourcing) ¹²	1	0	0

⁸ 2024 data from the De Beers Building Forever Report: Our Journey.

⁹ 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.

¹⁰ 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.

¹¹ 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.

¹² A Material Breach 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).

During 2024, one human rights-related material breach (which was unrelated to modern slavery, forced labour or child labour) was identified in our value chain at an external BPP participant's factory, the first time in over a decade that such a significant human rights issue has been identified. The issue identified was not directly or indirectly related to modern slavery or forced labour, but relating to broader human rights allegations. Our governance mechanisms, as detailed in the BPP Manual ([publicly](#) available), were triggered, with the BERC Co overseeing the process for investigation and remediation. The participant established a comprehensive remediation plan for affected people. This was followed by an unannounced third-party verification visit to review the implementation of the remedial action which was confirmed to be satisfactory by the third-party. We continue to monitor this entity and this segment of the industry through our risk-based approaches into 2025.

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

One Small Beneficiation Customer, onboarded in 2023, received its first on-site audit through the BPP Programme in 2024. The audit identified 1 Major Infringement, which related to social requirements. There was no evidence of human rights or modern slavery concerns on the premises. The BPP team will continue to support participants on their journey of continuous improvement in human rights and modern slavery risk management.

Two Major Infringements were also identified at another contractor site, manufacturing jewellery for Forevermark. The infringements related to the absence of a platform through which employees can report grievances, and a lack of evidence on human rights training carried out on the security personnel from outsourced company. However, no evidence of human rights abuses or modern slavery concerns emerged during the onsite audit and workers' interviews. By the end of the 2024 cycle, the contractor submitted appropriate Corrective Action Plans and evidence to close both findings.

The fourth Major Infringement was found at a diamond polished sales/buying office related to responsible sourcing, specifically regarding the entity not having conducted human rights due diligence.

The below table lists the overall number of Major and Minor Infringements¹³ 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):

Overall number of Major and Minor Infringements (consolidated)	2024	2023	2022
Business Responsibilities	35	44	59
Social Responsibilities	99	86	96
Environmental Responsibilities	10	3	7

Pipeline Integrity Programme

Pipeline Integrity (PI) is our third-party assured programme focused on the implementation of rigorous management systems, controls, such as training, documentation, procedures and policies, that help to demonstrate that the relevant pipelines are fully segregated, tracked and traced, and contain 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 001:2024. Only participants who have been successfully assessed against the Diamond Pipeline Integrity Specification 001:2024 and who demonstrate compliance with the BPPs are eligible to participate in De Beers Provenance Programme activities.

¹³ 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.

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. This means that, during PI only audits, the auditors will also verify that entities consistently uphold the BPP requirements relating to financial offences, Kimberley Process and System of Warranties, 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 all entities, including contractors, within their group handling eligible diamonds and are subject to an annual PI third-party verification.

In 2024, no instances of forced labour or issues relating to modern slavery requirements, or related risks, or child labour were identified through the PI Programme.

Responsible Sourcing of Diamonds, Precious Metals, Minerals and Gemstones

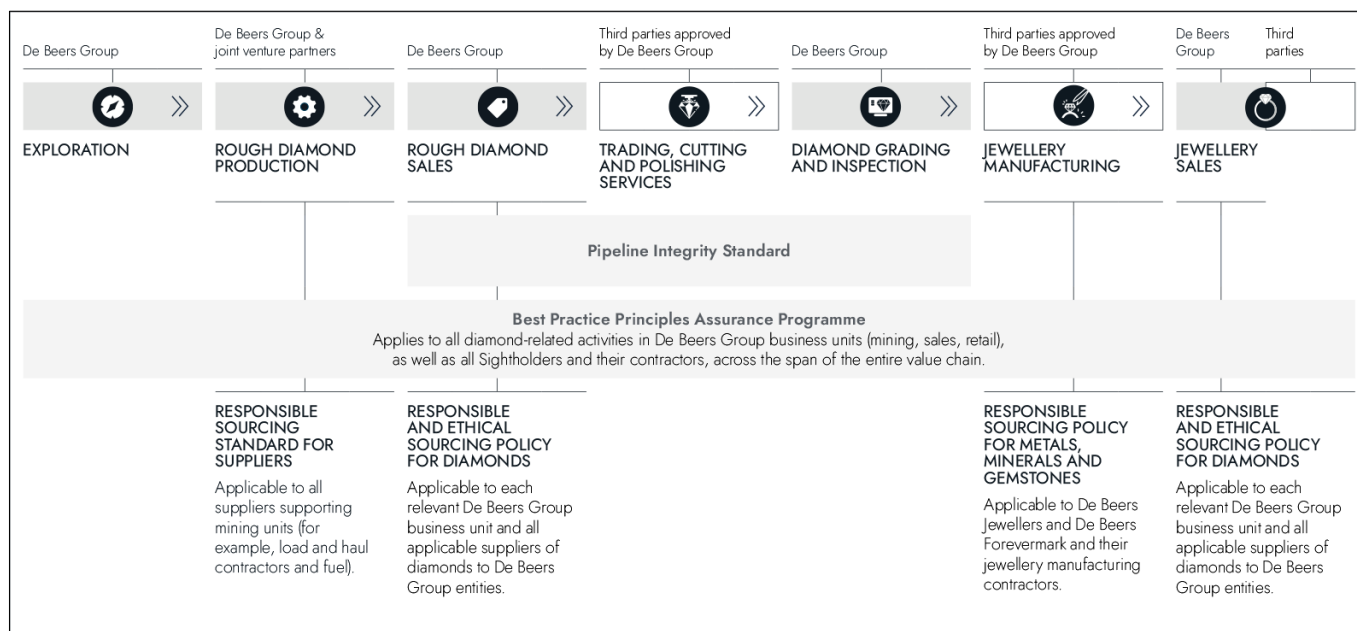
All diamonds and precious metals, minerals and other gemstones sourced by the De Beers Group's business units must meet our robust responsible sourcing practices, which require human rights due diligence to be undertaken on suppliers. This is to provide assurance that the diamonds, metals, minerals and 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 help 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 and include, but are not limited to, our position that we do not tolerate any form of torture, cruel, inhuman and degrading 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.

A key focus in 2024 has been to continue working alongside our De Beers Group entities to support the implementation of the policies, and, where necessary, the required assurance protocols and procedures.

- For our downstream (retail) brands, the focus has been on training the relevant teams and obtaining 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 rough and/or polished (natural) diamonds can be accepted into our supply chain.
- De Beers continually endeavours to ensure that, when exceptional diamonds (as defined) are sourced, there is a clear, risk-based due diligence process to evidence that they come from sources that meet our ethical and social responsibility standards. This review incorporates extensive due diligence to help ensure that any potential or actual human rights risks, including those related to modern slavery associated with the third-party producers or mines from which we source exceptional diamonds, are promptly identified.

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 2024 '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), which guide our alignment with human rights best practice when addressing any security-related issues. Security personnel and private contract security personnel receive training in how to respect human rights. Our inhouse security and human rights training curriculum covers all aspects of the VPSHR and is accessible via our e-learning application and face to face. In addition, the core elements of our inhouse training are incorporated into our Security Induction at all operations, including all managed and non-managed operations, including corporate offices and sites.

All private contract security entities are required to comply with the VPSHR, and their personnel are subject to the same training as our own security personnel. We regularly interact with public security bodies as part of our stakeholder engagements, and those discussions include our alignment with the VPSHR

The Anglo American Social Way Policy requires that security-related risks and impacts are 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 2024 to comply with the VPSHR. This included promoting awareness of the key principles of the VPSHR 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 Anglo American [Social Way](#) 3.0 framework (about which see more below), our managed and non-managed joint venture land based 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

Anglo American Social Way 3.0

The Anglo American 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 risks. 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 Anglo American Social Way Toolkit contains detailed guidance on the standards, processes and procedures required for effective social performance and implementation of the Anglo American 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 Anglo American Social Way. This 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, land access, displacement and resettlement.

During 2024, 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 Anglo American Social Way 3.0, as well as Anglo American's Mine Closure Toolbox.

Update on Progress

Our updated social performance management framework, Anglo American [Social Way](#) 3.0, for our land-based mining operations, was launched in January 2020. The Social Way sets mining-specific standards, and includes compulsory requirements specifically related to human rights due diligence, including:

- [Requirement 3B](#), Incident and Grievance Management
- [Requirement 3C](#), Social & Human Rights Risk and Impact Analysis (SHIRA) (annual), including impacts on personal and political security, including the right to freedom from slavery and forced child labour
- [Requirement 4E](#), Voluntary Principles on Security and Human Rights

The Anglo American [Social Way Toolkit](#) provides extensive guidance and templates to support operations with their implementation. For example, 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.

De Beers continues to implement the Anglo-American Social Way (3.0) at all its managed operations, and through bespoke risk-based approaches for our marine operations and exploration activities.

All mining operations are assessed annually through self-assessments, peer review and third-party audits to determine compliance with, and identify areas of improvement in respect of, the requirements of the Social Way.

In 2024, 100% of De Beers' managed mining operations were assessed against the Social Way and both the sites (Venetia and Gahcho Kue) continued to evidence consistent achievement against planned targets.

Non-Managed Entities (Joint Venture)

- Namdeb - Social Way assessment was not Mandatory for 2024, however, the Social Way was adopted and implemented with a focus on advancing their policy documentation as well as prioritising the focus on community impact risk management.
- Debmarmine Namibia focused on updating the SHIRA incident management procedures to include social consequences management procedure as well as developing the social grievances management procedure for implementation.
- Debswana continues to implement the Social Way consistently and conduct annual year-end assessment. 2024 assessment outcomes confirmed positive progress with a 4% improvement from 2023, thus recording 94% achievement. Social Impact and Socio-economic development strategy are linked with business objectives based on systematic risk and impact management. Social impact is incorporated in Life of Asset Plans with progress reviewed through Social Impact Management Committees.

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 comprises 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 GemFair's suppliers 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.

In addition to the Responsible ASM Assurance Programme, GemFair:

- Distributes a Fair Mining Policy to miners which 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 seeks to address supply chain risks (including modern slavery risks) related to sourcing ASM diamonds from either a conflict-affected or high-risk area.
- Investigates any reported or suspected breach of GemFair's Legitimacy or Core Requirements or other relevant policies and procedures.
- Convenes GemFair's Assurance Committee, a minimum of once per year, to discuss GemFair's response mechanisms to breaches.
- Regularly sensitises suppliers to the GemFair ASM Standard Requirements and other aspects of the GemFair Responsible ASM Assurance Programme, and updates elements of GemFair ASM Assurance Programme documentation to reflect evolving best practice, new regulation and to promote continuous improvement.

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, 2023 and one is currently underway at the time of writing.

Update on Progress

In 2024, GemFair continued to monitor modern slavery risks in its supply chain. This included:

- **Mine site assessments:** Mine site assessments carried out by trained field officers to monitor for human rights/ child labour/ forced labour issues at participating mine sites. The field team undertook 1,019 mine site assessments.
- **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 200 checks.
- **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. 433 miners received GemFair's Core Training course.
- **Revision to the GemFair ASM Assurance Programme:** GemFair revised the Assurance Programme to encapsulate updated best practice guidance for responsible sourcing from ASM and GemFair's new membership structure. The updated materials can be found at <https://www.gemfair.com/our-assurance-programme/>.

De Beers Auctions Botswana Proprietary Limited

De Beers Auctions predominantly sells rough diamonds sourced from our managed and joint venture mining operations. However, it may also source third-party rough diamonds from approved producers, in line with our [Responsible Sourcing Policy for Diamonds](#).

Update on Progress

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

In 2024, De Beers Group Auctions only sourced rough diamonds produced at De Beers' managed and joint venture mining operations.

At our Downstream Operations (Forevermark and De Beers London)

As articulated in our [Responsible Sourcing Policy for Diamonds](#) and [Responsible Sourcing Policy for Metals and Minerals](#), our consumer brands, De Beers London (DBL) and 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 London (DBL)

In alignment with both Responsible Sourcing Policies, DBL's core diamond suppliers and jewellery manufacturers are required 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, DBL may source exceptional diamonds from other approved sources. All approved sources are selected based on robust 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 DBL are required to be compliant with either the BPP Programme or certified against the RJC Code of Practices.

- In 2024, 100 per cent of our jewellery manufacturers met this criterion, with 6.25 per cent participating in the BPP Programme and 93.75 per cent being RJC-certified.
In 2024, our jewellery manufacturing contractor for DBL (which participates in the BPP Programme), received an “under-observation” compliance status due to one major infringement having been identified. This finding is not related to human rights or modern slavery and has since been appropriately addressed and closed.

In terms of its platinum sourcing, over the course of 2024, DBL aimed to source an increasing amount of its newly mined platinum from Anglo American Platinum, The remainder of DBL’s sourcing of platinum in 2024 was from recycled sources.

Forevermark

All 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 Forevermark diamonds inscribed with the Forevermark logo originate in rough form exclusively from our Group’s managed or joint-venture diamond mining operations.

Update on Progress

The focus for 2024 was to continue ensuring Forevermark jewellery manufacturers meet 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 Forevermark were onboarded to our BPP Programme in 2024.
- One Jewellery manufacturer’s contractor received a non-compliant rating owing to Major Infringements relating to social and business practices, which were all promptly addressed with adequate evidence of corrective action being provided.

At our Other Businesses

Element Six

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

Update on Progress

Element Six’s independent third-party annual audit of tungsten carbide suppliers did not identify any concerns.

Element Six continues to review and develop its supply chain due diligence. During 2024, Element Six rolled out a centralised vetting process for suppliers and customers to centralise screening on an on-going basis including in relation to modern slavery. In addition, Element Six has engaged a third-party expert to assist in reviewing processes in place in relation to sourcing. Furthermore, key suppliers, based on exposure and spend, were audited via self-assessment questionnaires to obtain a deeper understanding of their commitment to compliance.

Lightbox

Lightbox continues to apply its suite of procedures applicable to its relevant contractors¹⁴ and suppliers¹⁵, both before and after a business relationship is formed. Prior to the relationship being formed, contractors and suppliers must undergo minimum due diligence requirements. These checks seek to identify any red flags and potentially mitigate them in relation 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 2024, Lightbox's three core jewellery manufacturing contractors continued to be assessed annually against our ethical business, social and environmental standards which include human rights and human trafficking requirements. One Major Infringement was identified at one of the contractors, and was successfully and promptly closed with submission of a suitable Corrective Action Plan. Another contractor received two Major Infringements which did not relate to social requirements. Appropriate corrective action was submitted and the matter subsequently closed.

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 2024, Tracr launched rough to rough scanning to support single country of origin for De Beers. Across the midstream, Tracr platform participants continue to include Sightholders, who fall under existing due diligence and assurance processes. In 2024, Tracr began to extend participation to third party producers and midstream businesses, who are required to be RJC members or comply with the requirements of the BPP Programme, both of which set requirements for identifying and mitigating against potential modern slavery risks in their participants' operations and those of their suppliers.

Institute of Diamonds (IoD)

The Institute of Diamonds' services are offered to diamantaires across the diamond industry. Whilst the IoD does not take ownership of any diamonds it receives, the majority of its customers are Sightholders who therefore fall within existing De Beers 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.

Potential customers that are not Sightholders are 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 move forward with a view to offering its services to a prospective customer.

¹⁴ Contractors being entities providing services on behalf of a Downstream Business Unit (DBL, DBFM and Lightbox) relating to cutting and polishing and/or the manufacture of jewellery owned by a De Beers Group entity/facility or Joint Venture

¹⁵ Suppliers meaning Suppliers of Lab-Grown diamonds to Lightbox

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 helping to develop and maintain thriving and healthy host communities. Additionally, we are committed to working with suppliers who comply with applicable laws. This commitment underpins our aims to work with responsible suppliers whilst remaining committed to supporting suppliers to help them 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 helping to develop thriving and healthy host communities.

The De Beers South African business experienced a reduction in spend in 2024. This is attributed to the focus in streamlining the business by delivering on sustainable overhead cost savings through a range of measures. However, our inclusive procurement spend (where preference is given to Black owned enterprises, women owned enterprises, youth owned enterprises, or suppliers located in the host communities) has remained a key critical task, increasing from 78% in 2023 to 84% in 2024 in terms of relevant spend. This increase is attributed to the commitments made in respect of the Mining Charter requirements and the social contributions in the respective regions.

In 2024, we procured goods and services in excess of \$900million from over 1,414 suppliers for our South African operations and 660 suppliers for our Canadian operations.

Update on Progress

The De Beers Group Supply Chain function actively supports the Anglo American Supply Chain function's journey to 'Innovate Supply, Responsibly' which focuses on outcomes relating to safety, people, sustainability, value delivery and digitisation. All upstream suppliers are expected to adhere to the requirements of 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 other risks which may arise by contractors with a large staff complement. In 2024, as part of the Anglo American Responsible Sourcing Programme, we issued 358 self-assessment questionnaires (SAQs). Of these, 33 were high-value suppliers to Venetia mine, collectively responsible for 50 per cent of our annual expenditure on goods and services, and 36 were high-value suppliers to Gahcho Kué mine, accounting for 33% of our expenditure across the supply of goods and services. In addition, we engaged 289 Small, Micro and Medium Enterprise (SMME) suppliers from host communities neighbouring Venetia mine.

The requirements contained in the Anglo American Responsible Sourcing Standard reflect our commitment to fair and transparent business practices and we engage with suppliers to support them in seeking to manage those risks. Engagement with suppliers will continue in 2025 to support our work to monitor and manage changes within our upstream supplier risk profile and to identify any new risks that may emerge because of these changes.

Update on De Beers Group Supply Chain programme in 2024:

- Utilising the Informed365 platform, 358 suppliers were invited to complete the Anglo American Responsible Sourcing Programme SAQ. All responses were scored and rated to provide a risk rating for each supplier (including on indicators of modern slavery risks) by the Supply Chain team.
- Risk analysis has been scheduled for 2025 from the results submitted by the suppliers.
- In the reporting period, none of the upstream suppliers who completed SAQs, were identified as high risk. However, if a supplier is identified as a high risk, De Beers Group would engage with the supplier to help address the risks identified and support the implementation of a Corrective Action Plan (CAP). Tracking of actions would take place with possible onsite audits where required.
- Based on 2023 spend data, 16 suppliers were identified to participate in Responsible Sourcing Audits. This process started in Q4 2024. Audits are conducted by external third-party auditors. 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 there is a requirement for modern slavery awareness training for SMME suppliers.

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, encompassing child labour and modern slavery checks, through an independent third-party that 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 entered into upon the successful completion of these checks.
- The same due diligence processes were also applied to De Beers Group's top 300 suppliers, based on spend. 150 Suppliers were selected from SA and Canada.
- In 2025 a further nine suppliers will be audited and, where necessary based on the outcomes of the audit, CAPs with realistic timeframes for monitoring and close out of issues identified will be requested from them. This will help to ensure that potential risk events are managed and mitigated accordingly. The purpose of the CAPs is to require that any supplier non-conformances that may impact our Group are proactively remedied before a risk event can materialise.

Training

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:

The number of people who received training in human rights policies and procedures in 2024 was 1,368 (1,441 in 2023).

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 comprehensive guidance on how to implement new and existing (for new participants) requirements in the BPP Programme.

GemFair Training for ASM Miners:

In 2024, 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](#) report for further information.

Training on Voluntary Principles on Security and Human Rights:

In 2024, training was provided to a total of 1415 individuals, comprising 964 online training sessions and 451 face to face training sessions, (a total of 1275 took place in 2023). The training was delivered to employees, privately contracted security personnel and members of police services, utilising both in-class and e-learning formats across all of our operations.

Shift Training:¹⁶

In December 2024, De Beers business units received training on how to address forced labour risks in the supply chain and comply with applicable legislative requirements.

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 supply and value chain over the next 12 months.

Across our Group and Value Chain

- Our key aims for the 2025 BPP cycle include:
 - Conducting a further unannounced third-party verification visit at the location at which a human rights-related material breach was identified and remedied in 2024, to ensure that new management systems remain up-to-date, and standards maintained.
 - Implementing a more targeted audit regime in jurisdictions identified as higher risk.
- We will continue to evolve our current sourcing standards within the Responsible Sourcing Policy for Diamonds and for Metals, Minerals and Gemstones so that the policies remain aligned with robust ethical guidelines. We will continue to work closely with all our relevant business units to support their implementation of the policies.
- We will continue to align the BPPs with industry best practice and relevant responsible and ethical business practice assurance mechanisms and regulations. In particular, we are working to align the BPP requirements with the newly published RJC 2024 Code of Practice standards, for implementation in the 2026 BPP cycle. This will include an uplift to human rights due diligence expectations. These new changes will apply both to our own businesses and to all third-party BPP participants.

¹⁶ Shift is a leading centre of expertise on the UN Guiding Principles on Business and Human Rights. Shift is a non-profit, mission-driven organisation headquartered in New York City.

At our Upstream Operations

Anglo American Social Way 3.0

An update to the Anglo American Social Way Policy is planned for 2025, along with the evolution of the Social Way into a Standard supported by a practitioner toolkit. All necessary training on the updated standards and practitioner toolkit will aim to be rolled out by end of 2025.

At our Midstream Operations

GemFair

In the year ahead GemFair will be rolling out the revised Responsible ASM Assurance Programme to field staff and the artisanal miners from whom GemFair purchases diamonds. The rollout being planned may include in-person training, radio campaigns and outreach in mining communities. This serves as an opportunity to the GemFair team to reinforce the importance of respecting human rights at artisanal mining sites and in the wider Kono community.

At our Downstream Operations

De Beers London

- Training on the Responsible and Ethical Sourcing Policy for Diamonds and the Responsible Sourcing Policy for Metals, Minerals and Gemstones will be delivered to all new and existing team members sourcing materials for De Beers London's finished goods.

Forevermark

- All new jewellery manufacturing contractors will be onboarded to participate in the BPP Programme to support the Forevermark retail business in India.

At our Other Businesses

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 to require that all metal sourced by its jewellery manufacturers is sourced 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 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 support compliance with the Anglo American Responsible Sourcing programme.

The following activities are expected to be undertaken in 2025, with ongoing consideration of continuing our current efforts to help 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 upstream suppliers in the 2025 Building Forever five-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 each of Botswana and Namibia.
- Drive SAQ completion rates with routine supplier engagements.
- Engage an additional 100 suppliers to complete SAQs.
- Provide training on Responsible Sourcing principles to suppliers following SAQs.

DE BEERS GROUP