

DE BEERS GROUP

WORKPLACE HUMAN RIGHTS POLICY GROUP POLICY

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Version: 1.1

Policy owner: Executive Head, Human Resources, De Beers Group



Objective

Our Workplace Human Rights policy demonstrates our fundamental commitment to respecting internationally recognised human and labour rights within our employment practices. We are committed to providing a work environment in which every employee is treated fairly, is respected, has the opportunity to contribute to business success and is supported to realise their full potential as individuals.

Application of policy

This policy applies to all Colleagues at every level of De Beers' wholly owned and managed companies globally, this includes permanent, contracted and temporary employees, as well as directors ('you', 'Colleagues'). Some elements of this policy are only applicable to De Beers employees and in this instance, 'employees' will be referenced rather than 'Colleagues'. In the case of external contractors and where we do not have full management control, we will exercise our available leverage to influence compliance with this Policy.

Applicable laws and standards

In all contexts, we will:

- (a) Comply with all applicable laws and respect internationally recognized human rights, where we operate;
- (b) Seek ways to honour the principles of internationally recognized human rights when faced with conflicting requirements

Colleagues must be aware of and work to implement this Policy in line with:

- [De Beers' purpose, values and ambition](#);
- De Beers' policies and procedures, including:
 - [De Beers' Code of Conduct](#);
 - [Business Integrity Policy](#)
 - [Inclusion and Diversity Policy](#)
 - [Workplace Bullying and Harassment Policy](#)
 - Prevention and elimination of sexual harassment and gender based violence policy (South Africa only)
 - Local and Group HR policies and procedures for employees; and any relevant local policies and procedures that are applicable to contractors
 - [Group Supply Chain Policy](#)
 - [Group Security Policy](#)
 - [Social Way](#)
 - [Group Data Privacy Policy](#)
- [De Beers Best Practice Principles Assurance Programme Documentation](#);

Applicable laws and regulations;

- The United Nations Global Compact's ten principles; and
- International standards, including:
 - The International Bill of Rights (comprising the Universal Declaration of Human Rights, International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights);
 - The United Nations Guiding Principles on Business and Human Rights; and
- The following related International Labour Organization Conventions:



- Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87);
- Right to Organise and Collective Bargaining Convention, 1949 (No. 98);
- Forced Labour Convention, 1930 (No. 29);
- Abolition of Forced Labour Convention, 1957 (No. 105);
- Minimum Age Convention, 1973, (No. 138);
- Worst Forms of Child Labour Convention, 1999 (No. 182);
- Equal Remuneration Convention, 1951 (No. 100); and
- Discrimination (Employment and Occupation) Convention, 1958 (No. 111).
- Eliminating Violence and Harassment in the World of Work, 2019 (No. 190)

Human rights principles

To protect the inherent dignity of our Colleagues, we commit to respecting the principles set out below. All Human Rights principles should be read in conjunction with the applicable laws and standards.

General

- We treat our Colleagues with fairness, equality, respect and dignity.
- We strongly condemn and do not tolerate violence and harassment, including behaviour, practices or threats that result in or are likely to result in physical, psychological, sexual or economic harm.
- We provide access to grievance mechanisms to raise concerns regarding actual or potential breaches of human rights. We are committed to providing for or cooperating in remediation through legitimate processes where we identify that we have caused or contributed to adverse human rights impacts.

Freedom of association and collective bargaining

- We respect the right of our Colleagues to freedom of association with others (including cultural, religious or linguistic communities), including the right to form and join trade unions for the protection of their interests.
- We respect the right to bargain collectively, however, we will not require our employees to do so.
- We do not tolerate any interference or negative consequences (including being subject to any form of harassment, discrimination, or discipline) for exercising the rights to freedom of association and collective bargaining.

Forced labour

- We do not tolerate any form of modern slavery including forced or bonded labour.
- We are committed to avoiding any practices that may result in forced labour including the retention of personal documents (such as passports and ID cards) and requiring the payment of fees by employees (including recruitment fees). We have processes in place to set clear expectations of any intermediaries and agencies in relation to avoiding these practices as well.
- Overtime will be voluntary and in accordance with local legislation.
- We pay wages to our employees at regular intervals.
- We are committed to respecting the ability of Colleagues to move freely around and outside of the workplace or workplace accommodation, subject to reasonable and proportionate restrictions which are necessary to protect their rights or the rights of others.



Child labour

- We prohibit employing persons who are under the age of 15, the age of completion of compulsory schooling or the legal minimum hiring age under applicable laws and regulations, whichever is the highest. This includes internships, which are also required to be paid.
- Short term and unpaid work experience is allowable for students aged 15+, subject to any applicable laws, regulations, and due process.
- We prohibit employing persons under the age of 18 from engaging in work that is or may be hazardous to their health, safety or morals, including any night work, underground work and work deemed to involve dangerous machinery, equipment or tools.
- We do not impede Colleagues under the age of 18 from attending school, educational and/or related recreational activities.
- We have procedures in place in each of our operating countries to ensure that:
 - the age of prospective employees is verified prior to their employment; and
 - the requirements of this policy are adhered to where people under the age of 18 form part of our workforce.

Non-discrimination

Our Group Inclusion and Diversity policy aims to create a diverse and inclusive working environment in which all Colleagues feel valued, supported and respected.

- Within local legislative considerations, we do not tolerate discrimination in employment on the basis of age, race, colour, sex, religion, political or other opinion, gender, sexual orientation, marital status, language, national or social origin, property, birth, physical ability or socio-economic background or other recognised status.
- As stated in our Workplace Bullying and Harassment Policy, we have zero tolerance of any form of workplace bullying, harassment, victimisation or discrimination. We support the wellbeing of our employees and want everyone to feel safe and free from workplace bullying, harassment, victimisation or discrimination.
- We are committed to providing our employees with equal pay for work of equal value through fair and equitable reward processes and regular audit.
- We have measures in place to implement people processes that will ensure adherence to this policy.

Working conditions

- We respect our Colleagues right to privacy in line with our Group Data Privacy policy.
- We respect Colleagues right to a safe and healthy working environment.
- We work to provide all employees with employment documentation in a language they understand, which sets out their work hours and work conditions including location, job description, pay and any potential reasonable and proportionate restrictions on the exercise of human rights.
- We are committed to providing accommodation that is safe and of a good standard at our mine sites.



Raising a concern

We encourage a culture where individuals can speak up. Where possible, colleagues are encouraged to raise potential breaches or areas of concern relating to this policy to their line manager or the Human Resources department.

Concerns and potential breaches can also be raised via YourVoice. YourVoice is a confidential and secure whistleblowing line, which is independently managed to protect anonymity, available 24 hours a day, seven days a week, and is accessible by telephone, post, email or via the website: www.yourvoice.debeersgroup.com.

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

South African colleagues can raise concerns via the Living with Dignity Hub (the LwD “Hub”) specifically for complaints of gender based violence, harassment, victimisation or domestic violence. Contact number: +2711 638 0305 or email LivingWithDignity@angloamerican.com

Implementation of policy

Dissemination

This policy will be available on our De Beers Group website and on our internal intranet Pursuit online. Our HR department is responsible for promoting the principles of this policy to the wider business and referring Colleagues to where they can access the policy.

Training

All connected colleagues (those who have access to Navigator+ for training purposes) must complete mandatory introductory human rights awareness training when they join the business and every two years thereafter – this is launched via Navigator+. Non connected colleagues will be provided with alternative means of accessing these materials.

Breaches

Failure to comply with the principles set out in this Policy is a breach of Company policy and procedure and can result in remedial and / or disciplinary action.

Monitoring

Each Business Unit (wholly owned or joint ventures) complete an annual self-assessment to demonstrate compliance with the Best Practice Principles (BPP) requirements and undergo an independent third-party verification on a regular basis (approximately once every three years) against these standards, which are aligned to the Human Rights Principles contained within this policy.

This Policy will be reviewed by the Group HR Operations team every two years, or more frequently, if required by changes to any local legislation.



Further information

Glossary / list of definitions and abbreviations

Term	Explanation
Child labour	The definition of 'child labour' set out in the United Nations International Labour Organisation Minimum Age Convention (138), and as set out below, must be adopted. 'A child is defined as any person less than 15 years of age unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age shall apply. Child labour is therefore any work by a child younger than this age and any work that is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, moral or social development.'
Modern Slavery	Modern slavery refers to situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. It includes human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour
Employee	A direct employee of De Beers Group, either on a permanent or temporary contract. This includes connected and non connected Employees
Colleague	Broader name for employees as well as external contractors, consultants, agency temps and directors. This includes connected and non connected colleagues
Forced Labour	ILO Convention 29 defines forced or compulsory labour as 'all work or service which is exacted from any person under the menace of any penalty and for which said person has not offered himself voluntarily'
Bullying	Bullying is regarded as the misuse of power to criticise, intimidate, insult or undermine a person or a group in a way, which leaves them feeling hurt, humiliated or vulnerable.
Harassment	Harassment, in general terms, is unwelcome or unwanted conduct affecting the dignity of men and women in the workplace which causes detrimental effect. It may be related to age, gender, race, pregnancy, disability, religion, sexual orientation or nationality or ethnic origin and may be persistent or an isolated incident. The key is that the actions or comments are viewed as demeaning and unacceptable to the recipient.
Internships	Internships are employees on fixed term work placements and are paid. They are typically designed to give students or graduates an insight into a specific industry or career.
Work experience	Work experience is short term shadowing experience of around 5 days which is arranged in cooperation with the school. It is usually unpaid and is not a form of employment.

Revision history

The following changes have been made since this document was previously issued:

Old Policy name, date and version number:	Employee Human Rights Policy, July 2019, Rev 4.1 (Original 2006 Rev 1)
Main changes made:	General review /update of all sections, change in scope to include contractors