

DE BEERS GROUP

BEST PRACTICE PRINCIPLES

The Assurance Programme

Workbook 2020

CONTENTS

PREFACE	2
ASSESSMENT DETAILS	3
CERTIFICATION	3
A BUSINESS RESPONSIBILITIES	4
A.1 ETHICAL STANDARDS	4
A.2 COMMITMENT	4
A.3 BRIBERY AND FACILITATION PAYMENTS	4
A.4 FINANCIAL OFFENCES	5
A.5 KIMBERLEY PROCESS AND SYSTEM OF WARRANTIES	6
A.6 SOURCING FROM CONFLICT-AFFECTED AND HIGH-RISK AREAS	6
A.7 PRODUCT SECURITY	7
A.8 DISCLOSURE	7
A.9 MELEE ASSURANCE PROTOCOL FOR SIGHTHOLDERS AND ACCREDITED BUYERS	8
A.10 SUPPLY CHAIN MANAGEMENT/BEST ENDEAVOURS	9
A.11 PROVENANCE CLAIMS	9
A.12 GRADING AND APPRAISAL	9
B SOCIAL RESPONSIBILITIES	10
B.1 EMPLOYMENT	10
B.2 HEALTH AND SAFETY	11
B.3 NON DISCRIMINATION AND DISCIPLINARY PROCEDURES	12
B.4 CHILD LABOUR	12
B.5 FORCED LABOUR	13
B.6 HUMAN RIGHTS	13
B.7 DIRECT SOURCING FROM ARTISANAL AND SMALL-SCALE MINING	14
C ENVIRONMENTAL RESPONSIBILITIES	15
C.1 BEST ENVIRONMENTAL PRACTICE AND REGULATORY FRAMEWORK	15
D MINING SUPPLEMENT	16
D.1 EXTRACTIVE INDUSTRIES TRANSPARENCY INITIATIVE	16
D.2 IMPACT ASSESSMENT	16
D.3 COMMUNITY ENGAGEMENT AND DEVELOPMENT	16
D.4 HEALTH AND SAFETY	17
D.5 BIODIVERSITY	17
D.6 NATURAL RESOURCE AND ENVIRONMENTAL RISK MANAGEMENT	18
D.7 MERCURY	19
D.8 INDIGENOUS PEOPLES	19
D.9 ARTISANAL AND SMALL-SCALE MINING	19
D.10 SECURITY GUARDS	19
D.11 MINE CLOSURE PLANNING	20
D.12 SUSTAINABILITY REPORTING	20
E CORPORATE SOCIAL INVESTMENT AND BUSINESS IMPACT	21
F GOLD, PLATINUM GROUP METALS, SILVER AND COLOURED STONES	21
G INTEGRITY OF THE BPP PROGRAMME	21

PREFACE

This document is the Workbook that must be completed by De Beers Group Sightholders and/or Accredited Buyers and (as applicable) their contractors and sub-contractors, as well as De Beers Group and its contractors and sub-contractors. It is also the document that will be reviewed or completed as required by the independent Third Party Verifier.

This Workbook sets out the performance indicators against which compliance with the De Beers Group Best Practice Principles ("BPPs") will be verified, evaluated and reported through the De Beers Group Best Practice Principles Assurance Programme ("Assurance Programme"). The BPPs and the Assurance Programme are designed to lead to a general improvement in responsible business practices.

It is important to note that no particular answer denotes 'compliance' or 'non-compliance' and 'penalties' will not be incurred for one particular type of answer over another. Individual facilities will be assessed according to their own context and circumstances.

Please note that the requirements and performance indicators set out in this Workbook may be updated from time to time, as required.

The Workbook should be read in conjunction with the De Beers Group Best Practice Principles Requirements ("Requirements") and the De Beers Group Best Practice Principles Assurance Programme Manual ("Manual"). Sightholders and or De Beers Group Accredited Buyers are contractually bound under the terms of the Supply Agreement documentation to satisfy, and continue to satisfy (i.e. comply with), the BPPs. The Requirements, Manual and Workbook together set out the details for compliance with and monitoring of the BPPs. As such, they form an integral part of the Sightholder and or De Beers Group Accredited Buyer Policy Statement (which forms part of the Supply Agreement) and as a result, are legally binding documents.

Failure to comply with the BPPs and the Assurance Programme will constitute a breach of a Sightholder's and or De Beers Group Accredited Buyer's obligations under the Supply Agreement arrangements and will result in appropriate action being taken by De Beers Group pursuant to that documentation.

Save to the extent expressly stated to the contrary, words and expressions defined in the Supply Agreement documentation (including, for the avoidance of any doubt, the Manual) shall have the same meaning for the purposes of this Workbook.

All sections are applicable to De Beers Group entities with the exception of **Section F** on Gold. Similarly, all sections are applicable to the Sightholders and or De Beers Group Accredited Buyers with the exception of **Section D** on Mining.

ASSESSMENT DETAILS

**Principal Sightholder / De Beers Group Accredited Buyer Organisation /
De Beers Group Company***

Name:

Name of Assessed Facility:

First / Third* Party Assessment:

Assessment date:

Assessor 1 Name:

Male / Female*

Assessor 2 Name:

Male / Female*

General Manager signature:

Assessor 1 signature:

Assessor 2 signature:

* *delete as applicable*

CERTIFICATION

- If the entity being assessed is certified to **SA 8000**, there is no need to answer **questions in blue**.
- If the entity being assessed is certified to **OHSAS 18001/ISO 45001**, there is no need to answer questions in *Section B.2 – Health and Safety*.
- If the entity being assessed is certified to **ISO 14001**, there is no need to answer **questions in green**.
- If the entity being assessed is a **Certified Member of the Responsible Jewellery Council**, there is no need to answer **questions in red** or **sections with headings in red**.

A BUSINESS RESPONSIBILITIES

A.1 ETHICAL STANDARDS

1. Has the company/entity/facility, any associated company/entity/facility over which it exercises control, any principals, directors or (in the case of a company) controlling shareholders thereof been involved in any activity that has resulted in a material conviction, or any material penalty imposed by a government, industry or other regulator within the last 12 months?
2. Has the company/entity/facility, any associated company/entity/facility over which it exercises control, any principals, directors or (in the case of a company) controlling shareholders thereof, been involved in any activity that has brought the diamond industry into serious disrepute or damaged the consumer's perception of Diamonds or the Diamond industry, within the last 12 months?
3. Has the entity adopted the Code of Conduct?
4. Is the Code of Conduct effectively communicated to all employees and onsite contractors on an on-going basis?
5. Does the entity have systems in place to maintain awareness of, and ensure compliance with, applicable legal requirements?

A.2 COMMITMENT

6. Does the entity have a commitment that documents their dedication to responsible business practices that is endorsed by senior management, communicated to employees and made publicly available?
7. Does the senior management review the business practices on an annual basis to identify any gaps in the policy and implement any required changes?
8. Are business practices relevant to the Best Practice Principles and other applicable initiatives communicated to stakeholders on an annual basis at a minimum?

A.3 BRIBERY AND FACILITATION PAYMENTS

*If the entity being assessed is a **Certified Member of the Responsible Jewellery Council**, do not answer this section.*

9. Does the company/entity/facility have policies and/or procedures addressing all forms of bribery and facilitation payments that are commensurate to the level of risks involved given the nature of their business and their relationship with third parties?
10. Does the company/entity/facility have policies and/or procedures that ensure there is fair competition, commensurate to the level of risks involved given the nature of their business and their relationship with third parties?
11. Does the company/entity/facility train relevant individuals in how to comply with its policies and/or procedures and all relevant legislation on anti-bribery, facilitation payments and fair competition?
12. Does the company/entity/facility monitor compliance with these requirements and take any appropriate action based on findings?
13. Does the company/entity/facility have a published system that allows confidential reports of suspected bribes, inappropriate gifts and/or anti-competitive practices to be submitted by employees or external parties without fear of retaliation and for these to be investigated and actioned appropriately?
14. Does the company/entity/facility have systems to support employees who refuse to participate in bribery or facilitation payments?
15. Does the company/entity/facility record, control and attempt to eradicate all facilitation payments?

A.4 FINANCIAL OFFENCES

16. Is the appointment of the independent financial auditor free of any bias or influence relating to financial or other inducements?
17. Have the company's/entity's/facility's financial accounts been approved as being acceptable to international accounting standards, within the Assessment period, by an independent financial auditor with internationally or nationally accepted accounting qualifications, in jurisdictions where this is applicable?
18. Is your financial auditor aware of, or have you alerted your financial auditor to, applicable legislation imposing special anti-money laundering (AML)/ combating the financing of terrorism (CFT) compliance rules on dealers in precious stones or high value goods?
19. Does the company/entity/facility have policies and/or procedures addressing money laundering, terrorism financing and other financial offences?
20. Is there a system to identify the various jurisdictions encountered with each transaction and the associated regulatory requirements?
21. Has the company/entity/facility appointed a Money Laundering Reporting Officer (MLRO) or Financial Compliance Officer with sufficient seniority and authority and are the relevant entity principal(s) kept informed?
22. Does the company/entity/facility train relevant workers in how to comply with its policies and/ or procedures and all relevant legislation on money laundering, terrorism financing and other financial offences?
23. Does the company/entity/facility verify the identity of its diamond, coloured gemstone, gold, silver and PGM suppliers and clients; understand the nature of their businesses and the source of supplier's products and clients' funds?
24. Does the company/entity/facility have adequate Know Your Counterparty (KYC) due diligence procedures that identify corporate, individuals, and/or beneficial ownership (where appropriate), in accordance with applicable laws?
25. Has the company/entity/facility appointed an individual to be responsible for implementing the KYC policies and procedures?
26. Does the company/entity/facility implement appropriate verification measures for counterparties against relevant government lists and maintain these records for a minimum of five years, or as required by any applicable laws?
27. Does the company/entity/facility adhere to all relevant regulations with respect to reporting cash and similar non-cash transactions in excess of US\$10,000 (or a different threshold as set by applicable law, for example €3,000 in Belgium) to the applicable Financial Intelligence Unit?
28. Do the entity's Money Laundering Reporting Officer/Financial Compliance Officer and/or external auditor conduct regular internal audits to identify unusual or suspicious transactions?
29. Does the entity inform the relevant authorities of any suspicious transactions that may be linked to money laundering, terrorism financing or other financial or non-financial offences?
30. Does the company/entity/facility maintain business records relevant to AML/CFT compliance for the appropriate amount of time, on each individual transaction or apparently linked transactions that are in excess of \$10,000 or other relevant monetary authority threshold?

A.5 KIMBERLEY PROCESS AND SYSTEM OF WARRANTIES

31. Are there any monitoring systems and/or programmes and/or procedures in place to comply with the Kimberley Process?
32. Are the rules of the Kimberley Process effectively communicated to the relevant workers involved in the buying and selling of rough diamonds?
33. Is there a full declaration of rough diamonds in line with the Kimberly Process on all invoices for rough diamonds received and/or issued by the company?
34. Do independent auditors for the company/entity/facility audit and reconcile the flow of Kimberley Process warranties in, and Kimberley Process warranties out, on an annual basis?
35. Has the local Kimberley Process Authority denied the company/entity/facility an export certificate or detained any imported shipments within the Assessment period?
36. Are relevant workers, such as those involved in the buying and selling of rough diamonds, aware of the rules of the Kimberley Process?
37. Are there any monitoring systems and/or programmes and/or procedures in place to comply with the World Diamond Council System of Warranties?
38. Are the requirements of the World Diamond Council effectively communicated to the relevant workers involved in the buying and selling of polished diamonds and/or diamond jewellery?
39. Is there a full declaration of polished diamonds and/or diamond jewellery in line with World Diamond Council recommendations on all invoices for polished diamonds or diamond Jewellery received and/or issued by the company?
40. Do independent auditors for the group/entity/facility audit and reconcile the flow of World Diamond Council System of Warranties in, and World Diamond Council System of Warranties out, on an annual basis?

A.6 SOURCING FROM CONFLICT-AFFECTED AND HIGH-RISK AREAS

*If the entity being assessed is a **Certified Member of the Responsible Jewellery Council**, do not answer this section.*

41. Has the group/entity/facility established a full and complete sourcing policy to manage its sourcing practices and identified whether it is sourcing from high-risk or conflict-affected areas?
42. Is the sourcing policy endorsed at the highest levels of the organisation?
43. Has the group/entity/facility publicly communicated this policy?
44. Has the group/entity/facility appointed a senior manager with sufficient seniority, authority and experience to manage and implement sourcing policies and procedures?
45. Has the group/entity/facility implemented its policy requirements within relevant contracts (including supplier contracts), as appropriate?
46. Is there an appropriate procedure in place which ensures that relevant personnel are trained on sourcing practices?
47. Does the group/entity/facility keep records of all areas of its sourcing due diligence activities?
48. Are the sourcing policy and supporting procedures reviewed on an annual basis?
49. Depending on its business type, has the group/entity/facility taken all reasonable steps to obtain product information from its suppliers?
50. Depending on its business type, has the group/entity/facility taken all reasonable steps to conduct and maintain due diligence on its suppliers?

51. Depending on its business type, has the group/entity/facility taken all reasonable steps to ensure its suppliers' due diligence practices comply with the entity's sourcing policy?
52. Has the group/entity/facility taken steps (including raising awareness, training, capacity building) to ensure that its suppliers work in ways that are consistent with the entity's sourcing policy?
53. Does the group/entity/facility have a complaints and grievance mechanism, appropriate to the nature, scale and impact of the business, to allow interested parties to voice concerns about its responsible sourcing practices?
54. Depending on the business type, has the group/entity/facility established a process to identify any red flags from information collected from suppliers on practices and products?
55. In instances where red flags are identified, has the group/entity/facility undertaken a risk assessment to identify the risk or presence of adverse impacts from conflict-affected or high-risk area sources?
56. In instances where risks or presence of adverse impacts have been identified, has the group/entity/facility implemented a risk mitigation strategy, appropriate to the scale, impact and business type, including monitoring and tracking performance in relation to risk mitigation?
57. Does the group/entity/facility ensure it undergoes a third-party assessment which verifies its due diligence practices?
58. According to its business type, does the group/entity/facility publicly report on its human rights due diligence systems, practices and remediation on an annual basis?

A.7 PRODUCT SECURITY

*If the entity being assessed is a **Certified Member of the Responsible Jewellery Council**, do not answer this section.*

59. Does the company/entity/facility have policies and procedures to ensure products are secure during shipment and while on their own premises?
60. Do the procedures prioritise the security of employees, contractors and visitors?
61. Are relevant workers aware of the procedures?
62. Are there effective control systems in place to prevent substitution and to identify quickly when diamonds or coloured gemstones are misplaced or wrongly located?
63. Is the entity aware of and complying with any consumer safety issues relating to its products?

A.8 DISCLOSURE

64. Does the company/entity/facility deal in coloured gemstones or coloured gemstone jewellery, gold, silver and/or PGM materials and is also undergoing RJC (re-)certification through the BPP-RJC opt-in process? (If yes, the following section must be answered in the context of these materials as applicable as well).
65. Are there clear policies and/or procedures in place to ensure full disclosure on physical characteristics (as defined in the Requirements), for both natural and synthetic diamonds and diamond jewellery products, or treated, synthetic, reconstructed, composite or simulant diamonds, prior to completion of sale and are these effectively communicated to the relevant workers?
66. Does the business identify and comply with relevant local, national and international trading standards and legislation that are applicable to its diamond and diamond jewellery products?
67. Does the company/entity/facility purchase, manufacture, deal, trade or equivalent in synthetic diamonds and/or synthetic diamond jewellery? (NB: it is not a breach of the BPPs to purchase, deal and/or trade in synthetic diamonds so long as the BPP disclosure requirements are satisfied in full).

68. If the company/entity/facility sold any treated, synthetic, reconstructed, composite or simulant diamonds within the Assessment period, was the disclosure of these fully in accordance with the BPP Requirements?
69. If the company/entity/facility purchases, manufactures, deals, trades or equivalent in synthetic diamonds and/or synthetic diamond jewellery, does the entity ensure that there is physical segregation in storage facilities for these goods/products?
70. If claims relating to environmental and ethical impacts and practices are made in reference to synthetic diamonds, are these substantiated, qualified and specific?
71. As applicable, does the company/entity/facility have clear policies and/or procedures to ensure that its natural diamond production/polishing/jewellery manufacturing/trading and/or any other relevant process in its pipeline is segregated from its synthetic diamond business?
72. Has the company/entity/facility conducted an internal pipeline risk assessment identifying all possible contamination points of undisclosed synthetic diamonds entering its natural diamond supply chain?
73. Does the company/entity/facility have clear auditable policies, robust procedures and training to ensure that all contamination points are adequately addressed?
74. Does the company/entity/facility have auditable systems in place to ensure that its pipeline risk assessment, policies, procedures and training are current, active and effective?
75. Does the company/entity/facility apply adequate testing protocols for undisclosed synthetic diamonds that adequately address the risks identified?
76. If the company/entity/facility has traded in treated, synthetic, reconstructed, composite or simulant diamonds within the Assessment period, what steps has the company/entity/facility taken to ensure these stones are fully disclosed and segregated further down the supply chain, as far as the ultimate consumer?

A.9 MELEE ASSURANCE PROTOCOL FOR SIGHTHOLDERS AND ACCREDITED BUYERS

77. Does the company/entity/facility purchase, trade, deal in rough and polished goods in the 0.01 ct and below size category? If you answer 'yes' to this question, then please proceed to answer the following seven questions.
78. Has the company/entity/facility specifically identified the risks of undisclosed synthetic diamonds associated with goods that are 0.01 carats and below within their pipeline risk assessment?
79. Has the company/entity/facility implemented procedures to ensure each risk area is adequately addressed, in effect, sealing the pipeline in accordance with the BPP guidance provided?
80. Does the company/entity/facility have auditable systems in place to ensure this approach, including policies, procedures and training, are current and effective?
81. If the company/entity/facility uses off-site contractors to manufacture their goods in the 0.01 ct and below category, are these declared on the BPP SMART system as melee-manufacturing contractors and participating in the BPP Contractor Assurance Programme including self-assessment and verification visits?
82. If the company/entity/facility uses off-site contractors to manufacture their goods in the 0.01 ct and below category, is the final polished yield returned in tamper-evident packaging?
83. In identified high risk areas (e.g. purchasing from the open market), is adequate testing conducted on polished diamonds as outlined in compliance with the BPP guidance on the Melee Assurance Protocol?

A.10 SUPPLY CHAIN MANAGEMENT/BEST ENDEAVOURS

84. Has the company/entity/facility undertaken a risk assessment and appropriate steps to ensure any business partners who may pose reputational risks are acting in accordance with responsible business practices, such as those outlined in the BPP Programme?
85. Are there any policies and/or procedures and/or programmes in place to address compliance with the BPPs by contractors and sub-contractors that are directly involved in the mining, handling, manufacture and trade of gold, silver and PGM materials, diamonds, coloured gemstones and/or diamond or coloured gemstone jewellery?
86. Does the company/entity/facility have a process in place to address compliance with the BPPs by all employees and visitors to their sites?

A.11 PROVENANCE CLAIMS

87. Has the company/entity/facility assessed whether it is making any provenance claims?
88. Are systems in place to ensure any provenance claims are truthful and substantiated, understood by relevant employees, and fully described at point of sale, where applicable?
89. Do systems include a process and a complaints or grievance mechanism appropriate to the nature, scale and impact of the business enabling interested parties to voice concerns or to obtain further information?

A.12 GRADING AND APPRAISAL

90. If Diamond Grading and/or coloured gemstone analysis reports are generated, does the entity identify whether detection of synthetic diamonds or coloured gemstones and/or any treatments are part of the assessment?
91. If independent place of origin reports are generated for coloured gemstones, are systems in place to ensure consistency of the determination of origin, based on scientific methodology?
92. If appraisal reports are generated for end consumers, do these include the name of the customer to whom the report is being given and a statement of the purpose of the appraisal?
93. If Diamond Grading and/or coloured gemstone analysis Appraisal Reports are offered to end consumers, does the grader or appraiser disclose relevant vested interests in the sale of the jewellery product held by the grader or appraiser?
94. If the entity uses Appraisal Reports in the selling of diamonds and/or coloured gemstone /synthetic diamond and/or coloured gemstone jewellery products, does the entity ensure that these Appraisal Reports do not mislead end consumers with regard to the price?
95. If the entity uses Appraisal Reports in the selling of gold, silver and/or platinum group metal jewellery products, does the entity ensure that these Appraisal Reports do not mislead end consumers with regard to the price?

B SOCIAL RESPONSIBILITIES

If the entity being assessed is a **Certified Member of the Responsible Jewellery Council**, do not answer any question in *Sections B, C, or D*.

B.1 EMPLOYMENT

96. Are all workers employed according to applicable law?
97. Are all workers and trainees compensated according to applicable law (this includes minimum wage considerations for piece rate workers) or industry standard, whichever is the higher?
98. Does the entity make payments to employees on a regular and pre-determined basis in a manner and location convenient to all employees?
99. Are all payments accompanied by an understandable wage slip that clearly details wage rates; benefits and deductions where applicable?
100. Do all workers normally receive the average of one day off in every seven-day period, or the equivalent thereof?
101. Do all workers receive legally mandated leave, or where no legal provision exists, in line with ILO Convention 132?
102. Do all workers get a work break in accordance with applicable law or where there is no applicable law at least one uninterrupted work break if working longer than 6 hours?
103. Are workers compensated for absence due to illness in accordance with applicable law?
104. Does the worker working week, excluding overtime, not exceed local legal limits or 48 hours per week?
105. Is overtime voluntary, compensated in line with applicable law and sector regulations and, undertaken such that the total working week does not exceed legal limits or 60 hours?
106. Are all workers aware of and clearly understand the terms and conditions of their employment including, for example, working hours, wage structure, standing orders and disciplinary procedures?
107. Are there policies and/or procedures to allow for freedom of association and collective bargaining?
108. Has the entity ever prevented freedom of association and collective bargaining, including for discriminatory reasons?
109. Are all collective bargaining agreements adhered to?
110. Are fair and comparable wages, hours, and benefits guaranteed to all workers for comparable work?
111. In jurisdictions where this is applicable, is the classification of all workers (Skilled, Semi-Skilled, Unskilled), and associated rate of pay (where applicable), appropriately allocated for the relevant level of skill of the worker, and in line with the skill required to complete the work?
112. Are women employees entitled to maternity protection (leave and benefits as well as protection against discrimination) in accordance with the requirements of national laws and regulations or ILO Conventions (Nos. 183, 103 and 3)?
113. Where the company/entity/facility offers provisions or services to employees, are these provided for free or where there are no alternatives, is the rate charged fair and reasonable?
114. Where the company/entity/facility provides wage advances or loans are the interest and repayment terms fair and transparent to the employee?
115. Where the company/entity/facility uses employment agencies are there systems in place to ensure equitable compensation is received by all employees?

B.2 HEALTH AND SAFETY

If the entity being assessed is certified to **ISO 45001** or **OHSAS 18001** do not answer this section.

116. Does the company/entity/facility have policies and/or procedures on health and safety that identify, respond to and address the risk of workplace hazards?
117. Does the company/entity/facility have policies and/or procedures to ensure that workers are not under the influence of, or abusing, drugs, alcohol and/or illegal substances, whilst at work?
118. Are there records of occupational accidents, occupational diseases, standard injury rates and fatalities and are these incidents investigated and any required corrective actions implemented?
119. Are there records of standard absentee rates?
120. Is a senior manager at the facility responsible and accountable for health and safety?
121. Are all workers trained with respect to their duties, responsibilities and rights regarding health and safety and are they trained on the facility's health and safety procedures?
122. Do the workers have a mechanism to feedback health and safety issues to management?
123. Does first-aid equipment comply with the requirements of applicable law and is it readily available?
124. Are there sufficient numbers of trained first-aiders, as required by applicable law?
125. Are there suitable fire alarms and other fire safety devices and is there adequate provision of fire-fighting equipment in current working order and accompanied with instructions understandable to workers?
126. Are there sufficient and appropriately placed emergency exits, which are clearly marked and unobstructed in any way that open outwards and afford free access for complete evacuation, or are there satisfactory alternatives?
127. Does the entity have evacuation and emergency procedures in place to respond to all reasonable foreseeable emergency scenarios, and are these plans accessible to all personnel and prominently displayed?
128. Do workers have ready access to clean drinking water and sanitary food storage?
129. Is all electrical and mechanical equipment safely installed and free from any health hazard?
130. Are all workspaces sufficient in size and fit for the job performed there, and safe and clear of electrical, chemical, mechanical, noise or other hazards?
131. Is adequate personal protective equipment available and its correct use verified where required (for example, when acidising or boiling, etc.) together with proper instructions as to how to use it, and is this provided free of charge?
132. Are there adequate and safe facilities for the disposal of chemicals and waste (for example, used acid, etc.)?
133. Are relevant workers trained in safe storage, management, handling and disposal of all potentially hazardous material?
134. Are temperature, light, cleanliness and ventilation in the work environment consistent with the task being performed (given the requirements of the operation) and in compliance with applicable regulation?
135. Are sanitation facilities adequate, lockable, clean, well maintained and available to the entire workforce?
136. Are there appropriate facilities for childcare and nursing, as required by applicable law?
137. Where the facility operates dormitories for the workers, are these provided as required by applicable law, and where no applicable law exists, are best practice approaches adopted that are aligned with the facility's standards (for example with respect to fire safety and suitable conditions for pregnant/nursing women)?
138. If the entity cuts and/or polishes diamonds or coloured gemstones, are cobalt-free Diamond-impregnated scaifes used?

- 139. Where hazardous materials are used, does the entity engage in annual reviews to assess whether suitable non-hazardous alternatives are available?
- 140. Where men and women workers are engaged in working with hazardous materials are they appropriately informed of the potential risks to their health and are steps taken to address exposure?
- 141. Has the company/entity/facility conducted a bow tie risk assessment for the use of Hydrofluoric Acid?
- 142. Has the company/entity/facility developed and maintained an emergency preparedness, response and recovery plan that meets all legal requirements in reaction to all reasonable foreseeable emergency scenarios involving hydrofluoric acid?
- 143. Has the company/entity/facility prepared management guidelines to ensure sufficient training is provided for workers who are in contact with Hydrofluoric Acid?
- 144. Has the company/entity/facility developed decontamination procedures to respond to a hazardous incident involving Hydrofluoric Acid?

B.3 NON DISCRIMINATION AND DISCIPLINARY PROCEDURES

- 145. Are there policies and/or procedures in place that allow workers to make complaints or appeal without fear of redress (for example, in confidence or to a third party), with regards to illegal behaviour of colleagues?
- 146. Are there policies and implemented procedures that seek to prevent all forms of discrimination in compliance with applicable law?
- 147. Are there discrimination and disciplinary appeal procedures and have these been clearly communicated to all personnel?
- 148. Are records of Employee Grievances; Investigation processes and outcomes and Discrimination maintained?
- 149. Have deductions in wages been made for disciplinary reasons?
- 150. Has the company/entity/facility engaged in or supported corporal punishment, mental or physical coercion and/or verbal abuse?
- 151. Are there policies in place to ensure women and men workers are protected against discrimination based on marital status and against threats of dismissal or any other employment decision that negatively affects their employment status in order to prevent them from getting married or becoming pregnant? Are all workers with family responsibilities, both men and women, protected against all forms of discrimination?
- 152. Are all workers with family responsibilities, both men and women, protected against all forms of discrimination?
- 153. Are equal opportunities for all individuals who are fit to work provided for all aspects of training, personal and professional development and advancement?
- 154. Are there processes in place to ensure that comparable wages are paid to employees for carrying out work of equal value?

B.4 CHILD LABOUR

- 155. Are there policies and/or procedures in place to exclude the use of child labour (as defined by ILO Convention 138), including policies and/or procedures to ensure children are not hired in error, and are these policies and/or procedures in respect of child labour effectively communicated to relevant personnel and other interested parties?
- 156. Is any worker younger than the lesser of either 15 years (14 by ILO exceptions in ILO Convention 138) or the minimum applicable school-leaving age?

157. If children are present in the labour force, are there policies and/or procedures in place for the children to transition to and remain in some form of education until minimum school-leaving age or 15 (or 14 by ILO exceptions in ILO Convention 138), whichever is greater, and is there evidence of these policies and/or procedures being applied?
158. If young workers are present in the workforce, are they employed according to the requirements of applicable law, or if no law exists, the provisions of ILO Convention 138 and Recommendation 146?

B.5 FORCED LABOUR

159. Does the company/entity/facility have policies and/or procedures in place to prevent Modern Slavery, forced or compulsory labour and restriction of movement and are these applied?
160. Are security guards used in a manner commensurate with keeping people against their will and/or is there evidence that worker movements are unreasonably and unnecessarily restricted?
161. Where the facility operates hostels for workers, do workers (and their dependents, as applicable) have reasonable freedom of movement within the accommodation and to come and go?
162. Does management retain any important document (e.g. passport, driving licence, work permit, etc.), sums of money (e.g. one month's wages) or any 'hidden' bonds (e.g. payment/deposit for tools or housing) or other items belonging to the workers, while they are employed?
163. Has the company/entity/facility assessed and addressed, through relevant training and mitigation/prevention-strategies, the potential risks of human trafficking, including monitoring recruitment agencies, suppliers and contractors?
164. Is the company/entity/facility aware of any human trafficking activities internally or within any third-party recruitment agencies employed by the entity?
165. Where the facility employs contract or auxiliary workers, has the facility communicated its policy and requirements to the contractor/recruitment agency/company and monitored them to ensure there are no deceptive recruitment practices and that workers do not incur any fees in connection with their employment (migrant and local workers), and are not required to pay deposits or submit identification documents for the duration of their employment to secure employment?

B.6 HUMAN RIGHTS

166. Are there policies and/or procedures endorsed at the highest level in place covering human rights that complement the International Bill of Rights & the United Nations Guiding Principles on Business and Human Rights?
167. In accordance with the size, nature and context of risk within the entity, has a human rights due diligence process been undertaken to identify actual or potential risks?
168. In accordance with the size, nature and context of risk within the entity, does the entity prevent potential human rights violations and/or remedy actual ones?
169. Are all relevant personnel aware (e.g. through training) of their human rights policy?
170. Has the entity or group engaged in meaningful consultation with any groups of people, including their employees, to discuss how their human rights may be impacted by the entity or group's activities?
171. If the entity uses armed security guards, has need for these been established as the only viable alternative?
172. Do security personnel receive training on policies and/or procedures concerning all aspects of human rights such as the use of unlawful force when discharging their responsibilities?
173. Has the entity embedded its approach to the protection of human rights with regard to any third party relationships it has, appropriate to the nature, scale and impact of the business?
174. Has the group or entity undertaken a human rights due diligence process which specifically considers their sourcing practices?

175. Has the entity provided for a legitimate process to enable the effective remediation of any adverse effects its sourcing practices has on human rights?
176. Where the entity's business is provision of private security services to the jewellery supply chain, is the entity a certified member of the International Code of Conduct Association (ICoCA)?

B.7 DIRECT SOURCING FROM ARTISANAL AND SMALL-SCALE MINING

177. Does the group/company/entity/facility directly source coloured gemstones or gold, silver and/or PGM materials from ASM operations and is it also undergoing RJC (re-)certification through the BPP-RJC opt-in process? (If yes, the following section must be answered in the context of these materials as well).
178. If the group or entity is sourcing diamonds directly from ASM operations, have you established and implemented a responsible sourcing policy that defines standards of due diligence appropriate to the risks of sourcing from ASM operations?
179. If the group or entity is sourcing diamonds directly from ASM operations, are risks such as violence and armed conflict, forced labour, child labour, unsafe working conditions, sexual violence, illegal transactions, and significant environmental impacts regularly assessed?
180. If the group or entity is sourcing diamonds directly from ASM operations, are best endeavors implemented to reduce or avoid risks identified, or where actual impacts are identified, have best endeavours been applied to support their remediation?
181. If the group or entity is sourcing diamonds directly from ASM operations, have development opportunities for the ASM operation and/or its community/communities been identified and supported by the group or entity? Please provide examples.
182. If the group/entity is sourcing diamonds directly from ASM operations, are fair commercial terms offered to all ASM suppliers?

C ENVIRONMENTAL RESPONSIBILITIES

If the entity being assessed is a **Certified Member of the Responsible Jewellery Council**, do not answer any question in *Sections B, C, or D*.

C.1 BEST ENVIRONMENTAL PRACTICE AND REGULATORY FRAMEWORK

183. Is there a policy on environment that requires compliance with applicable local and international environmental legislation and regulations and is this policy communicated to all employees?
184. Does the policy cover the use of materials, energy and water and the environmental impacts of emissions, effluent, waste, goods and services?
185. Has the company/entity/facility established and implemented an Environmental Management System?
186. Has the facility taken steps to minimise the environmental impacts of its activities, products or services?
187. Does the company/entity/facility's policy include a commitment to prevent and minimise emissions to air, land and water, improve energy and water efficiency and work towards use of renewable energy?
188. Has the company/entity/facility taken steps to minimise its emissions to air, land and water including reducing Greenhouse Gas emissions and increasing energy efficiency, and increase efficiency in use of other significant natural resources?
189. Has the company/entity/facility taken steps to minimise waste through processes of reduction, recovery, reuse and recycling?
190. Does the company/entity/facility have a procedure to identify the risk of, and response to, environmental accidents and emergency situations and have a procedure to prevent and mitigate the environmental impacts of these?
191. Has the company/entity/facility provided training on environmental management systems, risks and controls to relevant employees and onsite contractors?
192. Has the entity reviewed whether there are suitable alternatives to hazardous substances used in processes where technically and economically viable?
193. Does the entity maintain an inventory of hazardous substances at facilities and provide relevant employees with clear information on associated environmental risks?
194. Are any chemicals or hazardous substances being used that are subject to international bans or phase-outs?

D MINING SUPPLEMENT

If the entity being assessed is a **Certified Member of the Responsible Jewellery Council**, do not answer any question in *Sections B, C, or D*.

D.1 EXTRACTIVE INDUSTRIES TRANSPARENCY INITIATIVE

- 195. Has the entity committed to the Extractive Industries Transparency Initiative?
- 196. In countries where EITI is not implemented, has the entity implemented systems to promote transparency, including public disclosure of taxes, payments and owners, and the use of rigorous procurement processes?

D.2 IMPACT ASSESSMENT

- 197. Has the entity conducted an impact assessment with the full engagement of affected communities, stakeholders and vulnerable groups for exploration and new mining facilities or significant changes to operations at existing facilities, which takes account of baseline conditions, cumulative and indirect impacts relating to environmental, social and human rights risks and includes environmental and social management plans to avoid, minimise and mitigate negative impacts?
- 198. Has the entity prepared and updated plans for managing environment, social and human rights risks including potential emergencies, and ensured that the burden of negative environmental consequences will not fall on vulnerable racial, ethnic, socio-economic or other vulnerable groups?
- 199. Are the impact assessments and associated management plans disseminated in an easily accessible way to all relevant stakeholders and made publicly available?
- 200. Are processes in place to monitor the implementation of management plans throughout the mine life-cycle to ensure impacts are being appropriately managed?

D.3 COMMUNITY ENGAGEMENT AND DEVELOPMENT

- 201. Does the entity establish strategic social objectives that are aligned with the project's lifecycle from exploration through to post-closure and are these established through stakeholder engagements and based on risk and impact assessments?
- 202. Does the stakeholder engagement enable the entity to identify community and other stakeholder development priorities and support activities that contribute to their lasting social and economic wellbeing?
- 203. Does the entity have appropriate skills, resources, suitably experienced personnel and implemented systems for early and on-going engagement with affected communities and stakeholders throughout the project's lifecycle from exploration through to closure and post-closure monitoring?
- 204. Do these systems enable identification and meaningful representation of affected communities and all relevant stakeholders particularly vulnerable groups in relation to risks, impacts and phase of development through the project lifecycle?
- 205. Do these systems include mechanisms to consider the views and aspirations of identified affected communities and stakeholders in relation to project risks and impacts when developing the mine project?
- 206. Do these strategic objectives and plans include clear accountabilities, timescales, budgets for implementation and monitoring plans and indicators?
- 207. Is broad support for major mining proposals sought using engagement processes that are inclusive, equitable, culturally appropriate and rights-compatible?
- 208. Does the entity have effective communication measures to disseminate relevant project information and receive feedback in an inclusive, equitable, culturally-appropriate and rights-compatible manner?

- 209. Does the entity avoid involuntary resettlement, and verify that where it is unavoidable, the extent is minimised and it is carried out (including compensation) in accordance with the International Finance Corporation (IFC) Performance Standard 5?
- 210. Does the entity consult and engage communities and stakeholders affected by exploration activities, new Mining Facilities or significant changes to operations at existing Facilities?
- 211. Does the scope of social impact assessments include an assessment of human rights, vulnerable and marginalised groups, gender and conflict?
- 212. Does the entity have a system to identify, assess and manage social risks and impacts, by the business and its contractors, on an on-going basis following formal impact assessments, particularly health, safety and human rights risks and impacts on vulnerable and marginalized people?
- 213. Where the entity has benefit sharing agreements or other formal commitments with governments or communities, are these negotiated in an inclusive, equitable, culturally-appropriate and rights-compatible manner?
- 214. Does the entity maintain a commitment register for all formal agreements (including regulatory and permitting) and other commitments, with accountability, timelines and budget allocated?
- 215. Does the entity maintain a metrics log/register system to track fulfillment levels of all commitments?
- 216. Does the entity have a policy, procedure and system for dealing with, resolving and providing remediation to social incidents, complaints and grievances, and that this system is understood and accessible to affected communities?
- 217. Does the entity seek to deliver long-term social and economic benefits in the areas where it is operating over the project lifecycle and through to post-closure through leveraging its core business activities to drive employment, job creation and skills development?

D.4 HEALTH AND SAFETY

- 218. Have emergency response plans been developed and maintained in collaboration with potentially affected communities, workers and their representatives, and relevant agencies, as described in the Awareness and Preparedness for Emergencies at the Local Level (APELL) for Mining guidelines?
- 219. Do emergency response plans include consideration of emergencies arising within the facility that have the potential to impact off-site areas?

D.5 BIODIVERSITY

- 220. Can the entity confirm that it does not carry out exploration or mining activities in World Heritage Sites, nor have negative impacts on World Heritage Sites adjacent to exploration or mining activities?
- 221. Does the entity identify, keep itself informed of and respect nearby legally designated protected areas?
- 222. Does the entity comply with Applicable Laws, covenants and other commitments given in relation to legally designated protected areas?
- 223. Does the entity identify Key Biodiversity Areas and implement measures to mitigate impacts and deliver measurable, commensurable biodiversity benefits?
- 224. Does the entity use the mitigation hierarchy to avoid, minimise or rehabilitate impacts on biodiversity and ecosystem services, only offsetting residual impacts where necessary after these measures have been applied?
- 225. Does the entity conduct assessment, management, planning, and implementation of mitigation measures and monitoring of the biodiversity, ecosystem services and protected areas affected by the mine site and provide overall net gain for the area?
- 226. Does the entity employ suitable qualified and competent professionals to manage and implement its impacts on biodiversity, ecosystem services and protected areas affected by the mine site?

227. Does the entity ensure that in areas of Critical Habitat, there are no measurable adverse impacts on the criteria for which the habitat was designated or on the ecological processes supporting those criteria?
228. Does the entity ensure exploration, development, operational or closure activities do not result in or present a risk to the extinction of a species listed on the IUCN Red List?

D.6 NATURAL RESOURCE AND ENVIRONMENTAL RISK MANAGEMENT

229. Has the entity adopted a waste management policy, approved and endorsed by senior management, regarding management of waste materials and mine waste facilities in a manner that eliminates (if practicable) and otherwise minimises risks to human health, safety, the environment and communities?
230. When the entity designs, constructs, monitors and maintains tailings facilities and waste rock facilities, is this done to ensure structural stability, and to protect the surrounding environment and local communities and prevent catastrophic failure of tailings facilities?
231. Does the entity monitor the control mechanisms to ensure on-going structural stability and protection of the environment and local communities?
232. Does the entity ensure that it does not dispose tailings into rivers for any new facilities?
233. Does the entity practice marine or lake tailings disposal from land-based facilities?
If your answer to the question above is 'yes', have you done any of the following:
- Conducted a detailed assessment showing that submarine tailings disposal is less risky and has lower environmental and social impacts than a land-based tailings facility?
 - Conducted scientific studies demonstrating that there are no significant adverse effects on coastal resources?
 - Is there long-term impact monitoring, including for cumulative impacts, and provisions made for mitigation plan(s)?
234. Has the entity carried out physical and geochemical characterisations and in-depth risk assessments of mine tailings and waste rock?
235. Has the entity ensured controlled discharge and protected and treated the surrounding environment and local communities from potential and actual impacts of acidification, metal leaching, loss of containment or contamination, including contamination of groundwater, during the mine's operation and post closure?
236. Has the entity ensured that there is sufficient knowledge of the potential impacts when carrying out exploration or mining activities in deep-sea areas, and that controls are implemented to mitigate any adverse impacts?
237. Does the entity carry out screening to determine whether there are significant impacts on offsite human noise receptors for new mines or when significant changes are made to existing mines?
238. Are the appropriate measures taken to establish baseline noise level, mitigating actions to ensure noise does not exceed prescribed legal levels and that relevant affected stakeholders are engaged in the mitigation strategies?
239. Does the entity undertake measures to reduce its emissions and increase resource efficiency on an annual basis?
240. Are impacts on water, air quality and soil consistently assessed, managed and mitigated?

D.7 MERCURY

- 241. Has the entity adopted responsible management practices to control and reduce mercury emissions considering best available techniques or best environmental practices, according to applicable law and in alignment with the Minamata Convention at a minimum?
- 242. Does the entity practice whole ore amalgamation, open burning of amalgam or processed amalgam, and burning of amalgam in residential areas; or cyanide leaching in sediment ore tailings to which mercury has been added without first removing the mercury?
- 243. For entities using mercury in artisanal and small-scale mining and processing activities, has the entity implemented time-bound action plans to reduce or eliminate the use of mercury or mercury compounds in emissions to the environment in these activities, and taken steps to prevent the exposure of vulnerable groups, particularly children, women of child-bearing age and pregnant women, to mercury?
- 244. Where mercury emissions are occurring does the entity report publicly, at least annually, on the implementation of their mercury management plan, including data?

D.8 INDIGENOUS PEOPLES

- 245. Does the entity fully respect the rights of indigenous people affected by its operations?
- 246. Does the entity have documented records of effective engagement with affected indigenous peoples, including any compensation, in order to obtain broad-based support for its activities?
- 247. For new mining entities or mining entities with significant changes that are likely to have significant adverse impacts on indigenous peoples, has the entity worked to obtain Free, Prior and Informed Consent (FPIC) of affected Indigenous Peoples prior to the planning and approval stages?
- 248. Has the FPIC process strived to be consistent with the traditional decision-making processes of the affected Indigenous Peoples while respecting internationally recognised Human Rights and based on good faith negotiation?
- 249. Has the entity documented the mutually-accepted FPIC process and agreement between the entity, affected Indigenous People and relevant government authorities?

D.9 ARTISANAL AND SMALL-SCALE MINING

- 250. Does the entity engage in initiatives to formalise any artisanal mining in its control?
- 251. Does the entity engage directly and maintain continuous dialogue with any artisanal mining operations on or around its facilities as part of its community engagement approaches and social and environmental impact assessments?

D.10 SECURITY GUARDS

- 252. Where relevant, have security risk assessments been conducted and are security personnel trained to ensure security approaches are consistent with the Voluntary Principles on Security and Human Rights and promote protection of human rights?
- 253. Are the human rights of artisanal and small-scale miners addressed in the training of private security personnel and any other relevant staff?

D.11 MINE CLOSURE PLANNING

- 254. Does the entity establish post mining land use during mine closure planning?
- 255. Does closure planning involve key stakeholders and is consideration given to establishing an appropriate self-sustaining ecosystem once the mine operations cease?
- 256. Does the entity, including new and proposed mining facilities, develop, review and maintain a closure plan for each facility, as early as practicably possible?
- 257. Does each plan include defined objectives for closure?
- 258. Does the closure plan include the capacity and resources, including financial provisions, to achieve the closure objectives and periodic reviews of closure funding estimates during the life of the mine?
- 259. Does the entity engage regularly with local stakeholders, including indigenous peoples, communities, ASM, workers and regulators, relating to each facility, regarding mine closure and rehabilitation plans?
- 260. Does the entity ensure that closed mine facilities are monitored for geotechnical stability and routine maintenance as required by applicable law?

D.12 SUSTAINABILITY REPORTING

- 261. Does the company, either directly or through a group, annually prepare and publish a public sustainability report of the mines' performance, using the Global Reporting Initiative (GRI) Sustainability Reporting Standards?
- 262. Does the company undertake external assurance of its annual sustainability report as defined by the GRI?

E CORPORATE SOCIAL INVESTMENT AND BUSINESS IMPACT

- 263. Does the business support the social, economic and institutional development of the community in which it operates and support community initiatives?
- 264. Please describe the impact your direct (core) business activities have in the community in which it operates (for example how many jobs you are creating and families your business supports. Please see further examples in the guidance provided).
- 265. Please provide an overview of your corporate social investment contribution that is extraneous to your regular business activities including whether such investment is monetary or in-kind (other corporate resources or time). This could include charitable activities undertaken by your business.
- 266. Please explain what initiatives your business engages in that positively impact society and the planet?

F GOLD, PLATINUM GROUP METALS, SILVER AND COLOURED STONES

- 267. Does the business identify and comply with relevant local, national and international trading standards and legislation that are applicable to its gold, silver and/or PGM jewellery products?
- 268. If the entity has sold any gold, silver and/or PGM or gold, silver and/or PGM jewellery, are there procedures to ensure all items are marked appropriately and accurately?
- 269. If the group/entity is sourcing post-consumer industrial precious metals from informal recyclers, have you established and implemented a responsible sourcing policy that defines standards of due diligence appropriate to the risks of sourcing from such suppliers?
- 270. If the group or entity is sourcing post-consumer industrial precious metals from informal recyclers, are risks such as unsafe working conditions, exposure to toxic chemicals, and significant environmental impacts regularly assessed?
- 271. If the group or entity is sourcing post-consumer industrial precious metals from informal recyclers, are best endeavours implemented to reduce or avoid risks identified, or where actual impacts are identified, have best endeavours been applied to support their remediation?
- 272. If the group or entity is sourcing post-consumer industrial precious metals from informal recyclers, have development opportunities for the recycler and/or its community/communities been identified and supported by the group or entity? Please provide examples.
- 273. If the entity's operations use cyanide in the recovery of gold or silver, is the group/entity a signatory to the International Cyanide Management Code, and are the relevant operations certified to this Code?

G INTEGRITY OF THE BPP PROGRAMME

- 274. Has this workbook been completed in the spirit of the BPPs?
- 275. Have the answers provided in the BPP workbook been completed with full explanation and evidence?
- 276. If consultants have supported the completion of this workbook, has this workbook been reviewed by any member of senior management of the entity?
- 277. If autofill has been completed, has this workbook been reviewed to ensure answers are relevant to the current BPP cycle?

DE BEERS GROUP