

DE BEERS GROUP

BEST PRACTICE PRINCIPLES

The Assurance Programme Requirements

Version 2024

CONTENTS

PREFACE	2
ABBREVIATIONS	3
A BUSINESS RESPONSIBILITIES	6
A.1 ETHICAL STANDARDS	6
A.2 COMMITMENT	7
A.3 BUSINESS INTEGRITY	7
A.4 FINANCIAL OFFENCES	7
A.5 KIMBERLEY PROCESS AND SYSTEM OF WARRANTIES	9
A.6 SOURCING FROM CONFLICT-AFFECTED AND HIGH-RISK AREAS	10
A.7 PRODUCT SECURITY	18
A.8 DISCLOSURE	18
A.9 MELEE ASSURANCE PROTOCOL	22
A.10 SUPPLY CHAIN MANAGEMENT/BEST ENDEAVOURS	23
A.11 PROVENANCE CLAIMS	24
A.12 GRADING AND APPRAISAL	25
B SOCIAL RESPONSIBILITIES	26
B.1 EMPLOYMENT	26
B.2 HEALTH AND SAFETY	28
B.3 NON-DISCRIMINATION, HARASSMENT, BULLYING, AND DISCIPLINARY PRACTICES	30
B.4 CHILD LABOUR	31
B.5 FORCED LABOUR	32
B.6 HUMAN RIGHTS	33
B.7 DIRECT SOURCING FROM ARTISANAL AND SMALL-SCALE MINING	34
C ENVIRONMENTAL RESPONSIBILITIES	35
C.1 BEST ENVIRONMENTAL PRACTICE AND REGULATORY FRAMEWORK	35
C.2 CARBON FOOTPRINTING	35
C.3 CARBON AND CLIMATE TARGETS	38
C.4 MEASURING PROGRESS AGAINST CARBON AND CLIMATE TARGETS	39
D MINING	40
D.1 EXTRACTIVE INDUSTRIES TRANSPARENCY INITIATIVE:	40
D.2 IMPACT ASSESSMENT	40
D.3 COMMUNITY ENGAGEMENT AND DEVELOPMENT	40
D.4 HEALTH AND SAFETY	42
D.5 BIODIVERSITY	43
D.6 NATURAL RESOURCE & ENVIRONMENT RISK MANAGEMENT	44
D.7 MERCURY	45
D.8 INDIGENOUS PEOPLES	45
D.9 ARTISANAL AND SMALL-SCALE MINING	46
D.10 SECURITY GUARDS	47
D.11 MINE CLOSURE PLANNING	47
D.12 SUSTAINABILITY REPORTING	47
D.13 DIVERSITY AND INCLUSION	47
E CORPORATE SOCIAL INVESTMENT AND BUSINESS IMPACT	48
E.1 GENERAL	48
E.2 OTHER ENVIRONMENTAL COMMITMENTS GUIDANCE	48
E.3 MEASURING PROGRESS AGAINST OTHER ENVIRONMENTAL COMMITMENTS	49
E.4 DIVERSITY AND INCLUSION INITIATIVES	50
E.5 THE GLOBAL GOALS FOR SUSTAINABLE DEVELOPMENT (UN SDGS)	52
F GOLD, PLATINUM GROUP METALS, SILVER AND COLOURED STONES	53
G INTEGRITY OF THE BPP PROGRAMME	53
FURTHER INFORMATION AND USEFUL LINKS	54
RESOURCE APPENDIX	63

PREFACE

This document sets out the detailed requirements of the De Beers Group Best Practice Principles Assurance Programme (BPP Requirements). The BPP Requirements consist of those standards that Sightholders and other BPP participants, their contractors, as well as De Beers Group and its relevant partners must adhere to in order to demonstrate compliance with the BPP Assurance Programme. It provides definitions, clarification, explicit requirements and performance indicators against which compliance will be assessed and verified, evaluated and reported through the BPP Assurance Programme.

Please note:

The BPP Requirements form part of, and should be read in conjunction with, the BPP Assurance Programme documentation. The BPP Assurance Programme documentation also consists of the BPP Manual and the BPP Workbook.

The BPP Assurance Programme documentation (including the BPP Requirements) should also be read in conjunction with the Supply Agreement documentation, of which the BPP Assurance Programme forms an integral part.

Both the BPP Assurance Programme documentation and the Supply Agreement documentation are contractually binding on Sightholders and other participants to the BPP Assurance Programme

Failure to comply with the BPP Assurance Programme documentation will constitute a breach of the Supply Agreement and will result in appropriate action being taken by De Beers Group pursuant to that documentation.

Please note that the BPP Requirements may be updated from time to time, as required, by the Business Ethics, Risk and Conduct Committee (BERC Co).

The BPP Requirements are rooted in the international framework of human rights, which comprises three main items: the Universal Declaration of Human Rights (UN 1948); the labour standards embodied in the Fundamental Conventions of the International Labour Organisation (ILO 1930-1999); and the Rio Declaration on Environment and Development (UN 1992).

These are binding for signatory nation states and are considered to provide the basis of responsible business practices and initiatives, including The Responsible Jewellery Council and The UN Global Compact's Ten Principles.

The BPP Requirements are presented as follows: Business Responsibilities, Social Responsibilities, Environmental Responsibilities, the Mining Supplement, a voluntary section on Corporate Social Investment and Business Impact, a section on Gold, Platinum Group Metals, Silver and Coloured Stones and a section on the Integrity of the BPP Assurance Programme.

ABBREVIATIONS

Please refer to the following glossary for definitions of abbreviations that are found in this document.

APELL

Awareness and Preparedness for Emergencies at the Local Level (APELL), is a programme developed by United Nations Environment Programme (UNEP) in conjunction with governments and industry with the purpose of minimising the occurrence and harmful effects of technological accidents and environmental emergencies.

Canada

Canadian Guidelines with Respect to the Sale and Marketing of Diamonds, Coloured Gemstones and Pearls, revised 2003.

CIBJO

World Jewellery Confederation (CIBJO). Its 'Blue Book', comprises the Diamond Book, the Gemstone Book and the Pearl Book, 1999 edition.

EC Directive

The Directive 2001/97/EC of the European Parliament and of the Council of 4 December 2001, Amending Council Directive 91/308/EEC on Prevention of the use of the Financial System for the Purpose of Money Laundering.

EITI

The Extractive Industries Transparency Initiative, a coalition of governments, companies, civil society groups, investors and international organisations with a global standard for transparency in oil, gas and mining.

ETI

The Ethical Trading Initiative Base Code (1998), an auditable code aimed at maintaining ethical operations throughout the supply chain.

FATF

Financial Action Task Force, an inter-governmental body of over 130 nations dedicated to combating all forms of money laundering and terrorism financing.

ICESCR

International Covenant on Economic, Social and Cultural Rights (1966), a United Nations treaty focusing on developmental rights such as the right to work, the right to join trade unions and the rights to housing and food.

ILO

The International Labour Organisation (ILO), a UN specialised agency that formulates international labour standards in the form of Conventions and Recommendations, setting minimum standards of basic labour rights.

OECD

Organisation of Economic Co-operation and Development, groups 38 member countries sharing a commitment to democratic government and the market economy, and has relationships with 70 other countries and NGOs/civil society.

RD

The Rio Declaration on Environment and Development (1992), an international binding agreement to protect the global environment via a set of defined principles.

RJC

The Responsible Jewellery Council, an international, not-for-profit organisation established to reinforce consumer confidence in the jewellery industry by advancing responsible business practices throughout the diamond and gold jewellery supply chain.

TDP

Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy, 1977 Document (ILO).

UN Norms

Norms on the Responsibilities of Transnational Corporations and Other Business Enterprises with regard to Human Rights (2003), which were developed by the UN Sub-Commission on the Promotion and Protection of Human Rights.

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 BPP Manual) shall have the same meaning for the purposes of the BPP Requirements.

For further information regarding the International Laws, Covenants, Regulations and Agreements that provide the legal referencing for the ensuing information, please refer to the following website address: <http://www.business-humanrights.org>, and the Resources Appendix at the end of this document.

DEFINITIONS

For the purposes of this document and the BPP Assurance Programme the following definitions shall apply:

Apprentices	Workers who are doing vocational training in the workplace for a fixed period. The fundamental aim of an apprenticeship is to learn a trade or acquire a skill. Apprentices do not participate fully in the production process of the unit because they work under an apprentice’s contract that stipulates this, or because the fact that they are undertaking vocational training impinges significantly on their productivity.
BPP Manager	An individual within a group/entity/facility participating in the BPP Assurance Programme who is tasked with managing all aspects of the BPP Assurance Programme applicable for that group/entity/facility (including but not limited to completion of the BPP Workbook, keeping the SMART System up to date etc.) and main point of contact on BPP-related matters.
Contractor	Any natural person, legal entity or business (or any part thereof) who carries out any work on behalf of De Beers Group or (as the case may be) any Sightholder group, or any part thereof, in connection with the prospecting, mining, buying and/or selling, or manufacturing of diamonds or diamond jewellery, where the mining concession and/or diamonds is/ are owned or controlled by De Beers Group (or any part thereof) or (as the case may be) Sightholder group (or any part thereof). This definition incorporates both Substantial Contractors and Non-Substantial Contractors.
Core Diamond Worker	An employee either directly or indirectly employed, directly engaged in processing diamonds within the diamond pipeline.
Counterparty	Any supplier or customer of diamonds or diamond jewellery products with whom you do business.
Diamond	A diamond is formed completely by nature without human intervention during the formation. It is a natural mineral consisting essentially of pure carbon crystallised with a cubic structure in the isometric system. Its hardness in the Mohs scale is 10; its specific gravity is approximately 3.52; it has a refractive index of 2.42 and it can be found in many colours.
Diamond Simulant	A diamond simulant is any object or product used to imitate diamond or some or all of its properties and includes any material which does not meet the requirements specified in the definition of diamond above.
Facilitation Payment	Facilitation payments are paid to receive preferential treatment for something that the payment receiver is otherwise still required to do.
Gold	Gold is a chemical element with the symbol Au, an atomic number of 79 and a mineral with specific hardness of 2.5–3 on the Mohs scale of hardness. It is a highly sought after precious metal that is generally used for coinage, jewellery and other arts as well as having a number of industrial applications.

Hazardous Substance	Any material that poses a threat to human health and/or the environment.
Laboratory-Grown Diamond	A Laboratory-Grown Diamond (or Synthetic Diamond or Laboratory-created Diamond), is an artificial product that has essentially the same chemical composition, crystal structure and physical properties as a Diamond.
Non-Core Diamond Worker	An employee engaged in non-diamond related work within an entity whose main revenues are derived from diamonds (eg cleaners/security guards/canteen staff).
Non-Substantial Contractor	A contractor, (as defined above), that generates less than 75% of its diamond related turnover in value or volume from one entity/facility forming part of a Sightholder or other BPP participant's group. De Beers Group reserves the right to change this threshold from time to time.
Substantial Contractor	A contractor, (as defined above), that generates 75% or more of its diamond related turnover in value or volume from one entity/facility forming part of a Sightholder or other BPP participant's group. De Beers Group reserves the right to change this threshold from time to time.
Treated Diamond	A treated diamond is any object or product that meets the requirements specified in the definition of the word 'diamond' as defined above that has been altered by any unnatural process by means of human intervention as per the definition of "treatment" below.
Treatment	Treatment means any process, treatment or enhancements changing, interfering with and/or contaminating the natural appearance or composition of a diamond other than the historically accepted practices of cutting and polishing. It includes colour (and decolourisation) treatment, fracture, filling, laser and irradiation treatment and coating.
Vulnerable Workers	Specific groups of people, such as women, migrants, people with disabilities, ethnic or religious groups, that exist within a larger population and that are at higher risk of being harassed, exploited or in any other way discriminated against.
Worker	Any individual who undertakes to do or perform personally any work or services for the company/entity/facility and whose status is not that of a client or customer of the group/entity/facility. For the avoidance of doubt, this definition shall include contractors and permanent, temporary, seasonal, full and part-time employees of any status (directors, managers and subordinate levels).

A BUSINESS RESPONSIBILITIES

A.1 ETHICAL STANDARDS

- A.1.1 To maintain and enhance consumer trust in, and the reputation of, the gem diamond industry, De Beers Group is committed to combating dishonesty and fraud in all business transactions. De Beers Group requires Sightholders and other BPP participants, including their contractors to make identical commitments.
- A.1.2 De Beers Group is committed to putting in place programmes that monitor the effectiveness of these commitments and to support all workers in that endeavour. De Beers Group requires Sightholders and other BPP participants to develop similar programmes to achieve the same outcome.
- A.1.3 All businesses should adhere to national laws. Where no appropriate national laws exist, the appropriate United Nations and/or International Labour Organisation ('ILO') Conventions and Declarations should be followed. Furthermore, where local laws stipulate certain general standards but provide that certain businesses (for example, small businesses) are subject to lower or no set standards, De Beers Group requires compliance with the general standards. Where local laws exist on issues within the BPP Requirements, De Beers Group requires compliance with whichever is the most stringent.
- A.1.4 No practice or conduct must be engaged in that brings the diamond industry into disrepute, including but not limited to:
- Any activity that results in a material criminal conviction.
 - Buying and trading rough diamonds from areas where this would encourage or support conflict and human suffering.
 - Practices which intentionally or recklessly endanger or harm the health and welfare of individuals.
 - Non-compliance with international best practice and the related regulatory framework with respect to the environment.
 - Any conduct that seeks to deceive, mislead, cheat or delude the consumer including:
 - Any undeclared or misrepresented trade in treated diamonds, whole or partial synthetic diamonds, or diamond simulants;
 - Any trade misrepresenting the colour, clarity, carat, cut and provenance of a diamond.
- A.1.5 All De Beers Group Business Units should adopt the Code of Conduct that brings together all the core principles and policies for employees and contractors and acts as a guide to making the right decisions.
- A.1.6 The Code of Conduct shall include all relevant policies, principles and values to enable employees to live the values and make the right decisions.
- A.1.7 All De Beers Group Business Units should ensure that records of communication are maintained.
- A.1.8 All De Beers Group Business Units should ensure the Code of Conduct has been adopted.
- A.1.9 All De Beers Group Business Units should establish an on-going process to ensure that all new employees and contractors are given a copy of the Code of Conduct and have received the relevant awareness/communication.

A.2 COMMITMENT

The group/entity/facility should demonstrate commitment to responsible business practices both internally to employees, and publicly to stakeholders with reference to alignment with the UN-adopted Sustainable Development Goals.

- A.2.1 A policy, endorsed by senior management, is required to demonstrate commitment to responsible business practices for all parts of the business. It should be documented and actively communicated to employees in addition to being made publicly available.
- A.2.2 Senior management should continuously monitor and document the implementation of the policy and procedures along with the performance throughout the business. A formal performance review shall be undertaken and documented to identify any gaps that occur between the policy and the business practices. This review should take place frequently throughout the year, potentially as part of the board meetings, and any suggested changes should be either deemed unnecessary or implemented not only in the specific entity but also in any other relevant parts of the business.
- A.2.3 The group/entity/facility shall identify issues relevant to the BPP Assurance Programme and/or RJC Code of Practices membership through their own operations, or, through involvement in community initiatives and communicate publicly their policies or positions along with any actions that were taken or objectives to their stakeholders at least annually.

A.3 BUSINESS INTEGRITY

- A.3.1 The group/entity/facility must implement effective policies and adequate procedures to prohibit involvement in bribery in all business practices and transactions that are carried out by them, or on their behalf by Business Partners. They will not offer, accept or countenance any payments, gifts in kind, hospitality, expenses or promises as such that may compromise the principles of fair competition or constitute an attempt to obtain or retain business for or with, or direct business to, any person; to influence the course of the business or governmental decision-making process. Procedures must include:
- Identification and monitoring of high risk areas of the business
 - Training at all levels on policies and procedures
 - Records of relevant benefits or gifts
- A.3.2 The group/entity/facility will provide confidential systems accessible to all stakeholders for the reporting and investigation of allegations of attempted bribery or inappropriate gifts within their organisation and will apply the appropriate sanctions for bribery and attempted bribery in all forms. This will include clear communication to their workers that they will not suffer retaliation for such reports or refusing to pay a bribe or facilitation payment even if this action may result in the entity losing business.

Where groups/entities/facilities have not yet been able to eliminate facilitation payments, they will implement appropriate controls to monitor, oversee and fully account for all facilitation payments made. They will work to ensure that they are of limited nature and scope, with an ultimate objective to eliminate all facilitation payments.

A.4 FINANCIAL OFFENCES

- A.4.1 Compliance is required with national, and where appropriate international, legislation and regulations with respect to money laundering, terrorism financing, bribery, corruption, smuggling, embezzlement, fraud, racketeering, transfer pricing and tax evasion.
- A.4.2 If groups/entities/facilities are not included in any other financial accounts (for example, but not limited to, those of a parent company), they will need annual independently audited financial accounts (or reviews in jurisdictions where permitted), and will need to demonstrate that the audit was carried out by a properly qualified auditor to international accounting standards and that the appointment of the auditor was free of any bias or influence.
- A.4.3 Financial auditors should be alerted to applicable national legislation imposing special anti-money laundering/combating the financing of terrorism compliance rules on dealers in precious stones or high value goods.

- A.4.4 Where applicable, the group/entity/facility will need to demonstrate that they have taken appropriate action to comply with:
- All relevant provisions of the USA Patriot Act, specifically including the Regulations for Jewellers and Metal Dealers issued by the U.S. Treasury's Financial Crimes Enforcement Network (FinCEN) in accordance with USA Patriot Act Section 352;
 - The EC Directive on Prevention of the use of the Financial System for the purpose of Money Laundering (EC Directive 2001/97) as transposed into national legislation of Member States of the European Union in which such groups/entities/facilities are incorporated or carrying on diamond-related business.
 - To the extent that the OECD Guidelines for Multinational Enterprises are incorporated into or otherwise reflected in national legislation of countries in which an entity is incorporated or operates; compliance is required with the Guidelines.
- A.4.5 Where applicable, the group/entity/facility will need to demonstrate that they have taken appropriate action to satisfy:
- United Nations Convention Against Illicit Traffic in Narcotic Drugs and Psychotropic Substances, also known as the 1988 Vienna Convention.
 - The relevant provisions in the FATF 40 Recommendations and 9 Special Recommendations that are applicable to the Designated Non-Financial Business Professions (DNFBP), which includes dealers in precious stones (i.e. diamantaires and jewellers).
 - The group/entity/facility must apply high standards in the selection, screening and acceptance of suppliers and purchasers of rough and polished diamonds, ensuring anti-money laundering policies and procedures are adopted, mandating due diligence during the selection process, continued transaction monitoring and relevant and appropriate worker training.
- A.4.6 The group/entity/facility must demonstrate that they are fully informed of all relevant legislation and regulations regarding bribery and facilitation payments in all relevant jurisdictions ensuring policies are developed and clearly explained to the relevant employees. This must include a documented Know Your Counterparty (KYC) policy and procedures which enable the entity to maintain an understanding of the nature and legitimacy of the counterparty's business. This must include:
- Identification and verification of counterparties, by checking government-issued identification and government listings for money laundering, fraud, involvement in prohibited organisations and/or financing conflict.
 - Monitoring transactions and report suspicious transactions to relevant authorities.
 - Maintaining records for at least five years (or longer if required by national legislation).
 - A nominated individual responsible for implementation of KYC policy and procedures.
 - Training, documentation and regular review.
 - The group/entity/facility must maintain records of all single or apparently linked cash or cash-like transactions equal to or above €10,000/US\$10,000 or the threshold defined by applicable law (whichever is lower) and, where required by law, implement a process to report such transactions to the relevant designated authority.

A.5 KIMBERLEY PROCESS AND SYSTEM OF WARRANTIES

A.5.1 The definition of 'Conflict Diamonds' agreed by the Kimberley Process must be adopted and all rough diamond imports and exports must be accompanied by a Kimberley Process Certificate. That definition is as follows:

“rough diamonds used by rebel movements or their allies to finance conflict aimed at undermining legitimate governments, as described in relevant United Nations Security Council (UNSC) resolutions insofar as they remain in effect, or in other similar UNSC resolutions which may be adopted in the future, and as understood and recognised in United Nations General Assembly (UNGA) Resolution 55/56, or in other similar UNGA resolutions which may be adopted in future.”

A.5.2 The World Diamond Council proposed System of Warranties must be adopted. All buyers and sellers of both rough and polished diamonds should only buy from companies that include the World Diamond Council warranty declarations on their invoices and memos and must make the following affirmative statement on all invoices, tailoring it to the specific purchasing practices:

“The diamonds herein invoiced have been {sourced}* purchased from legitimate sources not involved in funding conflict, in compliance with United Nations Resolutions and corresponding national laws {where the invoice is generated} . The seller hereby guarantees that these diamonds are conflict free and confirms adherence to the WDC SoW Guidelines.”**

***{sourced} - may be used by companies that do not purchase from open market, but source and aggregate diamonds from production facilities that are owned/partly owned by them**

****{where the invoice is generated} - may be used by companies if they specifically want to reference the country of invoice issuance**

Please note that a “diamond” may also be called a “natural diamond”, therefore the addition of this adjective is the only permitted deviation from the above statement, as per the updated World Diamond Council System of Warranties Explanatory Notes

A.5.3 The rules of the Kimberley Process and the requirements of the World Diamond Council shall be effectively communicated to the relevant workers involved in the buying and selling of rough diamonds and/or the buying and selling of polished diamonds and/or diamond jewellery.

A.5.4 In addition, each company trading in rough and polished diamonds is obliged to keep records of Kimberley Process Certificates and warranty invoices received, and the warranty invoices issued, when buying or selling diamonds for a minimum of three years. This flow of certificates and warranties in, and certificates and warranties out, must be audited and reconciled on an annual basis by the group's/entity's/facility's own auditors or external auditor if required by legislation. If asked by a duly authorised government agency, or third-party auditor, these records must be able to prove that the group/entity/facility is in compliance with the Kimberley Process.

A.5.5 The group/entity/facility must have a system or process in place to maintain awareness of and comply with applicable national and international sanctions that prohibit transactions or trade involving diamonds with sanctioned individuals, entities or organisations. These systems and processes should also ensure that the group/entity/facility does not buy or receive on memo rough diamonds from suspect sources or unknown suppliers, or rough diamonds which originate in countries that are not member of the Kimberley Process and/or have not duly implemented and/or enforced the Kimberley Process Certification System regulations prohibiting the trade in conflict diamonds.

A.5.6 To demonstrate compliance with the World Diamond Council's System of Warranties, the group/entity must complete an online self-assessment once a year (wdcsow.org). There is cross-recognition between the System of Warranties self-assessment, the BPP Assurance Programme and the RJC Code of Practices, therefore the group/entity may use its BPP compliance code or RJC certification number to reduce the completion of the System of Warranties self-assessment.

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

- A.6.1 Groups/entities/facilities must implement robust due diligence practices in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the 'OECD Guidance') or other equivalent due diligence frameworks in ways appropriate to their size and circumstances.
- A.6.2 Groups/entities/facilities should approach this section through a group-wide approach to their group of companies, while accommodating for the individual contexts of various subsidiaries as relevant within the group and framework to responsible sourcing. For example, a group of companies predominantly focused on cutting and polishing diamonds but with a single subsidiary in jewellery manufacturing should maintain its focus on its cutting and polishing entities, but ensure and demonstrate that consideration for jewellery manufacturing has been applied to its policies, procedures, training, risk assessment and reporting.

STEP 1: MANAGEMENT SYSTEMS

- A.6.3 The group/entity/facility must adopt and implement a supply chain policy with respect to sourcing from conflict-affected and high-risk areas, consistent with the OECD Guidance. This policy can be embedded within a broader responsible sourcing policy.
- A.6.4 The supply chain policy must be endorsed at the highest levels of the organisation, such as through executive level governance committees or executive level sponsorship.
- A.6.5 The group/entity/facility must appoint a senior manager with sufficient seniority, responsibility authority and experience to manage and implement the supply chain policy and its accompanying procedures.
- A.6.6 Appropriate resources should be available to implement the policy and procedures.
- A.6.7 The senior manager's role will include the following:
- Lead the supply chain policy's development and implementation;
 - co-ordinate and communicate the policy's implementation across the organisation;
 - work to ensure all relevant suppliers respect the policy, and review business relationships with suppliers based on risk levels;
 - carry out internal and (if relevant) external training;
 - respond to identified supply chain risks;
 - publicly report on due diligence every year and
 - review and propose improvements to the due diligence system.
- A.6.8 The group/entity/facility must publicly communicate their policy position on sourcing from conflict-affected and high-risk areas in ways that are appropriate to the nature and scale of the organisation, such as through their company website.
- A.6.9 Where relevant, the group/entity/facility will need to implement its policy requirements within relevant contracts, such as with suppliers.
- A.6.10 The group/entity/facility can align other due diligence practices with the implementation of the policy, such as (and not limited to) its human rights due diligence processes and Know Your Counterparty processes.
- A.6.11 The group/entity/facility shall ensure that they identify relevant employees that would require training on this policy, such as buying teams, invoicing teams, sales and marketing teams.
- A.6.12 The group/entity/facility shall ensure that the relevant personnel are trained on sourcing practices and that ongoing training is implemented, either based on a timeframe and/or on changes to the policy to ensure that they are aware of the group's requirements.
- A.6.13 The group/entity/facility needs to maintain records of all aspects of its sourcing due diligence activities for a minimum of five years, including but not limited to, invoices received, correspondence with suppliers, supplier contracts, supplier due diligence research, country risks and questionnaires.
- A.6.14 The group/entity/facility shall define the instances when it will terminate or suspend a supplier.
- A.6.15 The group/entity/facility shall seek to establish strong relationships with its suppliers through longer term contracts rather than short one-offs.

- A.6.16 The group/entity/facility will communicate its due diligence requirements and its supply chain policy requirements to its suppliers through appropriate measures, including email updates, training for suppliers, examples of requirements.
- A.6.17 The group/entity/facility will start to implement contractual provisions amongst its suppliers when up for renewal to include provisions relating to the sharing of due diligence information.
- A.6.18 The group/entity/facility shall, where practical, encourage suppliers to include provisions in their own contracts with their suppliers.
- A.6.19 The group/entity/facility will establish an effective grievance mechanism that offers all parties, including affected stakeholders and whistleblowers, a way to raise concerns about the business, organisations, individuals or activities in its supply chains. The grievance mechanism can be the same one as that required for human rights due diligence.
- A.6.20 The group/entity/facility shall ensure that:
 - The mechanism is easily accessible to all who may wish to use it: this means allowing for grievances to be submitted in multiple ways—by email, letter, telephone and in person.
 - Whistle-blowers will be protected by allowing them to remain anonymous.
 - Accurate and updated log of all grievances and follow-up actions is maintained.
 - A transparent process and procedure for responding to grievances is established that ensures all grievances are responded to in a timely and efficient manner.
 - Grievances are tracked with a verifiable corrective action that can be monitored and assessed.
 - If a grievance is dismissed without any follow-up, accurately log and record full justifications and details of any investigation.
- A.6.21 The group/entity/facility shall commit to and undertake a formal review of its policy and procedures on an annual basis.

STEP 2: IDENTIFY AND ASSESS RISKS

- A.6.22 The company/entity/facility must establish which position they are in within the diamond value chain:

Upstream Companies	Midstream Companies	Downstream Companies
<ul style="list-style-type: none"> • Exploration • Mining companies • Artisanal and Small-scale Miners (ASM) • Rough exporters (first export) 	Traders (rough and polished), cutting and polishing: <ul style="list-style-type: none"> • Tier 1: sourcing directly from exploration, mining companies and/or artisanal and small-scale miners (ASM) • Tier 2: Source from rough exporter, Tier 1 entities, or from other Tier 2 entities 	<ul style="list-style-type: none"> • Polished-only Traders • Jewellery Manufacturing • Jewellery Wholesaler • Jewellery Retail

- A.6.23 Depending on its position within the diamond value chain, the group/entity/facility must seek to secure the appropriate product information from each of its diamond suppliers, while maintaining appropriate confidentiality in respect of sensitive information as appropriate.
 - Gather information for the group's/entity's/facility's own operations for each supplier.
 - For Upstream Companies and Tier 1 Midstream Companies, information on a, b and c (see Table 1.1) can be gathered once and updated when there are changes. This information shall be reviewed at least once every year. Information on d and e (see Table 1.1) might need to be gathered or shared for every shipment, parcel or consignment if these vary. For Tier 2 Midstream Companies and Downstream Companies, information on a, b, c and d (see Table 1.3) can be gathered once and updated when there are changes.
 - This information may not always be available (eg if the group/entity/facility is sourcing from ASM); best endeavours shall be used to gather what information is available.

Table 1.1 – The product information that Upstream Companies and Tier 1 Midstream Companies should seek from each of their diamond suppliers.

	Information to gather for internal systems (and/or from suppliers if applicable)	Information to share with buyers
All supply chains	a. The origin of stones, with the greatest possible specificity. This information can be provided in aggregated form (eg a list of all mines, companies, regions or geographical locations that material come from).	Same as “information to gather” column, with due regard for commercial sensitivity.
	b. All locations where stones are consolidated before export.	Same as “information to gather” column, with due regard for commercial sensitivity.
	c. The method of extraction (ASM or large-scale mining).	Same as “information to gather” column, with due regard for commercial sensitivity.
	d. The weight and, if relevant, other characteristics of the stones (eg product classification, type and physical description).	Same as “information to gather” column, with due regard for commercial sensitivity.
	e. The transportation routes of stones (information shared with due regard to security).	Same as “information to gather” column, with due regard for commercial sensitivity.
Red-flag supply chains only	f. The identity of all suppliers and relevant service providers (eg transport companies) from the origin through to export/import – in particular, their ownership (including beneficial ownership); corporate structure (including names of corporate officers and directors); and business, government, political or military affiliations.	Assurance that this information is being gathered.
	g. All taxes, fees or royalties paid to government related to the material’s extraction, trade, transport and export.	
	h. All payments or compensation made to government agencies and officials related to the material’s extraction, trade, transport and export (including facilitation payments).	
	i. All payments made to public or private security forces or other armed groups at all points in the supply chain from extraction onwards (unless prohibited under applicable law).	

Table 1.2: Information needed to determine source of the different types of material for Upstream and Tier 1 Midstream Companies:

Material type	Definition	Information needed in determining source
Mined material	Rough and polished diamonds and coloured gemstones that come from mines.	Seek information on the origin and/or source as outlined in the tables above according to your position in the supply chain.
Recycled material	Polished diamonds and coloured gemstones that had a prior use by a consumer and have re-entered the supply chain to be recut and polished and/or resold.	Confirm that the material received is recycled material and obtain sufficient information to reasonably confirm that the stones are not falsely represented as recycled to hide their origin.
Grandfathered material	Existing stock of diamonds/ coloured gemstones purchased before 23 April 2019.	Origin determination is not required unless there is reasonable evidence to suspect the authenticity of the grandfathered status of the material. Appropriate invoices, purchase orders, and inventory lists to verify the purchase date must be available and kept on record for all grandfathered stones.

Table 1.3: The product information that Tier 2 Midstream Companies and Downstream Companies should seek from each of their diamond suppliers.

All supply chains	a. The identity of immediate suppliers.
	b. The sources of stones. This information can be provided in aggregated form (eg a list of all countries, areas and/or companies where material comes from). The rough exporter should be identified (first export from country of mining origin) or Tier 1 midstream company if possible, and if not, then the furthest upstream point in the known supply chain should be identified.
	c. Where available, evidence that immediate suppliers have carried out due diligence based on an approach that is aligned with the OECD Guidance.
	d. Where available, evidence that immediate suppliers have done the same with their immediate suppliers, and the same has been encouraged further up the supply chain (eg through inclusion in contractual agreements).
Red-flag supplier	e. Evidence of audits carried out in conformance with the OECD Guidance, covering the sourcing practices of red-flag suppliers (see Table 1.4 below).

- A.6.24 Information can be sought through many ways including company websites, checklists, forms, invoices, establishing contractual obligations and collecting and documenting information received during meetings.
- A.6.25 The group/entity/facility shall keep records of all information obtained and efforts to obtain information for a minimum period of five years.
- A.6.26 The group/entity/facility shall commit to making the information it has obtained available to its buyers further downstream and auditors upon request.
- A.6.27 In instances when suppliers are unable or unwilling to provide requested information, the group/entity/facility shall seek to exploit all possible opportunities with these suppliers to obtain the information. In some instances, this will be easy to resolve while other instances will require complex solutions. All options should be exhausted prior to making a decision to terminate or suspend the supplier and records maintained of the efforts undertaken.

- A.6.28 The group/entity/facility shall undertake a process to identify any red flags within its supply chain based on the due diligence information received. A red flag is a warning or indicator of a potential risk. In the context of due diligence, a red flag can be a location, supplier or circumstance that triggers a need for enhanced due diligence (that is, further investigation).
- A.6.29 If the group/entity/facility has been able to reasonably determine that red flags are not present in its supply chain, then the sources can be considered low risk, requiring minimal further action other than ensuring that:
- Its company management system continues to work effectively.
 - The group/entity/facility reports publicly on its due diligence practices.

Table 1.4 – list of red flags as defined by the OECD:

Type of red flag	Description of red flag
Red-flag locations (locations of origin and transport)	The material originates from or has been transported through a CAHRA.
	The material is claimed to originate from a country with limited known supplies (that is, the declared volumes of diamonds or coloured gemstones from that country are out of keeping with its known reserves or expected production levels).
	The material is claimed to originate from a country through which material from CAHRAs is known or reasonably suspected to pass through.
	The material is claimed to be recycled in a country where diamonds or coloured gemstones from CAHRAs are known or reasonably suspected to pass through.
Red-flag supplier	Suppliers or other known upstream companies that operate in one of the above-mentioned red-flag locations, or have shareholder or other commercial interests in suppliers from these red-flag locations.
	Suppliers or other known upstream companies are known to have sourced material from a red-flag location in the last 12 months.
Red-flag circumstances	Anomalies or unusual circumstances are identified through the information collected, which give rise to a reasonable suspicion that the extraction, transport or trade of the material may contribute to conflict or be associated with serious abuses.
<p>The process for identifying location or supplier red flags varies depending on where you are in the supply chain:</p> <ul style="list-style-type: none"> • If you are an upstream company or Tier 1 midstream company, you need to look at all countries, regions and areas that you operate in, source from, plan to source from or transport material through, and establish whether or not they are CAHRAs. • If you are a Tier 2 midstream or downstream company, you need to ask your immediate suppliers for their due diligence information. They, in turn, should be seeking this information from their suppliers and providing you with the names and due diligence information, in aggregate, of the rough exporters (first export from country of mining origin) or Tier 1 midstream companies if possible. If not, then the furthest upstream companies in the known supply chain (the source) should be provided. You should review this to see if your suppliers have, or reasonably should have, recorded any red flag <p>The presence of ASM-sourced diamonds does not automatically imply a red flag.</p> <p>The Presence of red flags does not mean adverse impacts have occurred in your supply chain and risk assessment needs to be undertaken to identify whether there is a presence of adverse impacts related to CAHRAs.</p>	

Resources for identifying Conflict-Affected and High-Risk Areas:

There are many resources available for identifying Conflict-Affected and High-Risk Areas (CAHRAs) including:

- Research reports from governments, international organisations, non-governmental organisations (NGOs) and media;
- maps, UN reports and UN Security Council sanction lists; and
- relevant industry literature on the material's extraction, and its impacts on conflict and human rights.

Key focus areas include:

- Governances – areas with weak or no governance or security, including:
 - Political instability or repression
 - Institutional weakness
 - Insecurity
 - Collapse of civil infrastructure
 - Widespread violence.
- Human rights – areas affected by widespread human rights abuses and violations of law including:
 - Torture or cruel and degrading treatment
 - Forced and child labour
 - Widespread sexual violence
 - War crimes
 - Crimes against humanity
 - Genocide.
- Conflict: areas in a state of conflict, including:
 - International conflict
 - Wars of liberation or insurgencies.
 - Civil wars
 - Any other armed aggression.

The adverse impacts related to CAHRAs specifically related to mineral supply chains are:

- Serious abuses associated with the extraction, transport or trade of minerals.
- Any forms of torture, cruel, inhuman and degrading treatment.
- Any forms of forced or compulsory labour.
- The worst forms of child labour.
- Other gross human rights violations and abuses such as widespread sexual violence.
- War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.
- Direct or indirect support to non-state armed groups (covered by the KPCS for diamonds).
- Direct or indirect support to public or private security forces.
- Bribery and fraudulent misrepresentation of the origin of minerals.
- Money laundering and non-payment of taxes and royalties due to governments.

Source: OECD Guidance: Annex II Model Supply Chain Policy

STEP 3: DESIGN AND IMPLEMENT RISK MITIGATION

- A.6.30 Where red flags are identified, the following steps must be undertaken, depending on the type of company the group/entity/facility is:
- Mapping the factual circumstances of red-flag territories for current and future operations by gathering available information, for example through:
 - **An in-depth review of the context** of all red-flag locations
 - Generating or reviewing reports, maps and relevant literature on extraction, transport and trade in the red-flag location.
 - Engaging with stakeholders by consulting, for example, with local and central governments, local civil society organisations, community networks, etc.
 - If sourcing from other upstream suppliers, reviewing their working policies and systems (eg through desktop research)
 - **On-the-ground assessments** to generate and maintain information on how rough diamonds and coloured gemstones are extracted, traded, handled and exported. Whether the group/entity/facility is a mining company only dealing with their own production or a mining company, rough trader, exporter or importer sourcing from other miners, the assessment should be carried out ensuring that:
 - The assessors are independent from the activity being assessed and free from conflicts of interest.
 - The appropriate level of competence and expertise is deployed, whether this is with internal or external experts.
 - In situations where many companies are operating in a similar area (for example, sourcing from an ASM area), considering establishing a joint assessment team with other companies or through an industry or multi-stakeholder mechanism or initiative.
- A.6.31 If the group/entity/facility is a Tier 2 midstream or downstream company:
- Further evaluating the due diligence and risk mitigation practices of rough exporters (first export from country of mining origin) or Tier 1 midstream companies if possible, and if not, then the due diligence and risk mitigation practices of suppliers furthest upstream in the known supply chain.
 - Considering any information that is available from upstream companies in the red-flag supply chain.
 - If the due diligence practices of any upstream companies in that supply chain have been independently audited against a relevant standard, trying to get the results and reviewing them.
 - Alternatively, Tier 2 midstream or downstream companies may identify through industry cooperation and schemes the rough exporters or Tier 1 midstream companies that meet the requirements of this guidance in order to source from them.
- A.6.32 In instances where risks or presence of adverse impacts have been identified, a risk management strategy needs to be designed and implemented, appropriate to the nature and scale of your organisation and realistic ability to implement mitigating measures. Please see Table 1.5 below.

Table 1.5

Identified risk of adverse impact	Appropriate response
Serious abuses associated with the extraction, trade and transport of minerals	Immediately suspend or disengage from suppliers.
Direct or indirect support to non-state armed groups	Immediately suspend or disengage from suppliers.
Direct or indirect support to public or private security forces who illegally control mine sites, transport routes and upstream actors (including illegal taxation)	Continue, or temporarily suspend, trade with suppliers but implement measurable mitigative actions. Suspend or disengage if mitigation measures are ineffective.
Bribery and fraudulent misrepresentation of the origin of minerals	Continue, or temporarily suspend, trade with suppliers but implement measurable mitigative actions, Suspend or disengage if mitigation measures are ineffective.

- A.6.33 The group/entity/facility shall consider factors such as severity and probability in its assessment and mitigation plans
- A.6.34 For upstream and Tier 1 companies the mitigation management plan for red flags should:
- Establish a traceability system that collects and maintains information that is specific to red-flag supply. This means that parcels can be tracked from extraction through to export and each actor involved in the trade and transport can be identified.
 - Enhance physical security practices over the supply chain.
 - Monitoring and tracking performance of risk mitigation may be done in co-operation or consultation with local and central authorities and other relevant stakeholders. Consider establishing or supporting worker or community-based networks to monitor risk mitigation.
- A.6.35 In some cases, material may have been purchased with adequate due diligence and in good faith before becoming aware of a reasonable risk of serious abuses or support to non-state armed groups (and therefore before suspending or disengaging trade). In these cases, the group/entity/facility should temporarily physically segregate supplies that have already been purchased until the risk is resolved. If the risk is not resolved, the group/entity/facility should seek legal advice on selling the material and be transparent with potential clients about your good faith due diligence efforts and mitigation actions
- A.6.36 Traceability is only required when red flags are identified and only for upstream and Tier 1 midstream companies. Traceability can be per mixed parcel or batches.
- A.6.37 If the group/entity/facility is a Tier 2 midstream or downstream company, the risk management plan should be based on enhanced engagement with suppliers and strengthening systems of information collection. This includes ensuring that the information received from suppliers on the source with the identified risk is regularly updated.
- A.6.38 The group/entity/facility must define a timeframe for achieving significant measurable improvement (maximum six months) and continue monitoring the supply chain to assess your plan's effectiveness.
- A.6.39 If, after reasonable efforts at mitigation, the group/entity/facility still fails to achieve its desired outcomes, it should disengage from the supplier.
- A.6.40 If circumstances with the supplier change, such as their supply processes or sources, additional fact and risk assessment should be undertaken due to these changes in circumstance.
- A.6.41 Findings of supply chains risk assessment shall be reported to the designated senior management and risk mitigations shall be monitored appropriately.

STEP 4: THIRD-PARTY ASSESSMENT OF COMPANY DUE DILIGENCE PRACTICES

- A.6.42 The group/entity/facility shall undertake a third-party audit of its full due diligence practices by an independent verifier.
- A.6.43 The BPP Assurance Programme on-site audit, when undertaken at the Corporate Headquarters, can be considered to be a third-party audit of the group's/entity's/facility's due diligence practices.
- A.6.44 RJC certification against the RJC 2019 Code of Practices can also be considered to be a third-party audit of the group's/entity's/facility's due diligence practices for locations and activities in scope of that certification.

STEP 5: ANNUAL REPORTING

- A.6.45 The group/entity/facility shall publicly report on its due diligence systems, practices and approaches at least annually either through company websites, company reports, and other publications and/or human rights due diligence reports can be used for these purposes. Small businesses are not required to prepare a print publication but can establish a short memorandum which can be made available upon request.
- A.6.46 The level of detail in the report should reflect the level of risk in the group's/entity's/facility's supply chain, the scale and impact of the business.

For groups/entities/facilities involved in gold, platinum group metals, silver and/or coloured gemstones business and are opting in for RJC certification through the BPP Assurance Programme, please refer to the RJC Code of Practices, COP 7, and Due Diligence for Responsible Sourcing from Conflict-Affected and High-Risk Areas Standards Guidance for the requirements.

A.7 PRODUCT SECURITY

- A.7.1 The group/entity/facility will establish and implement product security policies and procedures within the premises and during shipment to protect against product theft, damage or substitution.
- A.7.2 The group/entity/facility will prioritise the security and well-being of employees, visitors and other relevant business partners when establishing product security measures to prevent product theft, damage or substitution.
- A.7.3 All businesses should ensure that diamond or diamond jewellery products sold by members to end consumers will be compliant with the applicable regulations for product health and safety.

A.8 DISCLOSURE

FULL DISCLOSURE

- A.8.1 Full disclosure is the complete and total release of material information about a diamond or other stones and the material steps it has undergone prior to sale to the purchaser. The vendor must make all reasonable efforts to ensure this information is disclosed at all times during the selling process, including advertising and marketing. Full disclosure of all material facts must take place whether or not the information is specifically requested and regardless of the effect on the value of the item being sold.
- A.8.2 Full disclosure, by the vendor to the purchaser, must take place when offered for sale, such that:
- Full oral disclosure must clearly take place prior to the completion of sale;
 - Full written disclosure must be conspicuously included on each bill of sale or receipt in plain language and readily understandable to the purchaser. Written disclosure should normally be in English and any relevant local language;
 - Disclosure must be immediately preceding or succeeding the description of the diamond and/or other products and must be equally conspicuous to that description.
- A.8.3 It is recommended that the nomenclature standards defined in the International Standard on 'Jewellery – Consumer confidence in the diamond industry', ISO 18323:2015 (E) are adhered to ensure clear and accurate labelling on how to describe diamonds, treated diamonds, synthetic diamonds, composite diamonds and imitations of diamonds. The group/entity/facility can elect to certify against the ISO 18323 standard. See also the guidance provided in the Diamond Terminology Guideline.

MISUSES OF TERMINOLOGY

- A.8.4 It is contrary to the purposes of the BPP Requirements:
- To make any representation that does not conform in all respects to these Requirements in the selling, advertising or distribution of any gold, diamond, treated diamond, synthetic diamond or diamond simulant defined in these Requirements;
 - To make any misleading or deceptive statement, representation or illustration relating to origin, formation, production, condition, quality or fineness of any gold, diamond, treated diamond, synthetic diamond or diamond simulant defined in these Requirements.
- A.8.5 Representation includes illustrations, descriptions, expressions, words, figures, depictions or symbols shown in a manner that may reasonably be regarded as relating to the substance.
- A.8.6 Selling includes offering for sale, exposing for sale, displaying in such a manner as to lead to a reasonable belief that the product so displayed is intended for sale. For avoidance of doubt this includes the accepted industry practice of 'memo', the practice of consigning goods, normally polished, to clients for pre-arranged periods for potential sale.
- A.8.7 Advertising includes directly or indirectly promoting the sale or use of a product.

DIAMOND

- A.8.8 The unqualified word 'diamond' must not be used to describe or identify any object or product not meeting the definition in the Definitions section above.
- A.8.9 The size or carat weight, colour, clarity or cut must be described in accordance with recognised guidelines appropriate to the jurisdiction.

SYNTHETIC DIAMOND

- A.8.10 The fact that a stone is wholly or partially synthetic diamond must be disclosed at all times.
- A.8.11 A synthetic diamond must only and always be disclosed as 'synthetic diamond', 'man-made', 'laboratory created', 'laboratory-grown' or 'artificial' and the description must be equally as conspicuous and immediately preceding the word 'diamond'.
- A.8.12 Any terms that are designed to disguise the fact that a stone is synthetic diamond or that mislead the consumer in any way must not be used. For example the terms 'natural', 'real', 'genuine', 'precious', 'cultured', 'cultivated' and 'gem' must not be used to describe a synthetic diamond.
- A.8.13 Names of firms, manufacturers or trademarks are not to be used as descriptors for synthetic diamonds, unless such names are clearly succeeded by the terms 'synthetic diamond', 'man-made' or 'artificial', as above. For example, a business trading as Acme may describe its synthetic diamonds as 'Acme synthetic diamonds' but not as 'Acme diamonds'.

In accordance with the ISO 18323 standard it is recommended that any abbreviations such as 'lab-created' must not be used to describe a synthetic diamond.

TREATED DIAMOND

- A.8.14 Treatment means any process, treatment or enhancement changing, interfering with and/or contaminating the natural appearance or composition of a natural diamond other than the historically accepted practices of cutting and polishing. It includes colour (and decolourisation) treatment, high pressure high temperature (HPHT) treatment, fracture filling, laser drilling and irradiation treatment and coating.
- A.8.15 The fact that a natural diamond has been treated must be disclosed at all times.
- A.8.16 A treated diamond must be disclosed as either 'treated' or with specific reference to the particular treatment and the description must be equally conspicuous and immediately preceding the word 'diamond'.
- A.8.17 A description of the type of treatment and the methods used to achieve the treatment must always accompany the diamond.
- A.8.18 Any term that is designed to disguise that treatment has occurred, or to imply that a treatment is part of the normal polishing process or that misleads the consumer in any way should not be used. For example the term 'improved' must not be used to describe a natural diamond which has been treated.
- A.8.19 Any significant effect on the natural diamond's value caused by the treatment must be disclosed.
- A.8.20 Any special care requirements that the treatment creates must be disclosed.
- A.8.21 Names of firms, manufacturers or trademarks are not to be used in connection with treated diamonds, unless such names are clearly succeeded by the word 'treated' as defined in this section or are otherwise equally conspicuously and prominently disclosed as treated. For example, a diamond business trading as Acme may describe its treated diamonds as 'Acme treated diamonds' or 'Acme diamonds, treated by HPHT' but not as 'Acme diamonds'.

DIAMOND SIMULANT

- A.8.22 Diamond simulants must always be disclosed either as the mineral or compound that it is or as a 'diamond simulant', 'imitation diamond' or 'fake diamond'. The unqualified word 'diamond' must never be used with diamond simulants.
- A.8.23 Names of firms, manufacturers or trademarks are not to be used in connection with diamond simulants, unless such names are clearly succeeded by the terms as defined in this section. For example, a business trading as Acme may describe its diamond simulants as 'Acme cubic zirconia' or 'Acme diamond simulants' but not as 'Acme diamonds'.
- A.8.24 As defined in the ISO 18323 standard: Gemstones other than diamond whose colour, cut and appearance might be misrepresented as a diamond shall always be referred to by its mineral name, and not described as 'imitation of diamond'. This could include gemstones such as quartz, sapphire, topaz, zircon and beryl.

COMPOSITE STONE

- A.8.25 As defined in the ISO 18323 standard: Composite stones where all parts are composed of diamonds must be called 'composite diamond' or 'diamond doublet'.
- A.8.26 A composite stone where some, but not all, parts are diamonds shall be described as 'doublet' (two parts) or 'triplet' (three parts) or 'composite' (two or more parts). These words shall be immediately combined with the correct names of the components that form the final assembled product, the names of which must be mentioned from the upper part downwards, and be separated by a slash (/). For example, a doublet whose upper portion is diamond, and whose lower portion is synthetic diamonds is called a 'diamond/synthetic diamond doublet' or 'doublet diamond/synthetic diamond'.

RECONSTRUCTED STONES

- A.8.27 Reconstructed diamonds shall be disclosed as such and the description shall be equally conspicuous as the word 'diamond'.

REAL, GENUINE AND NATURAL

- A.8.28 The words 'real', 'genuine' and 'natural' must not be used to describe:
- Any synthetic diamond (see Definitions);
 - A treated diamond (see Definitions);
- A.8.29 The words 'real' and 'genuine' must not be used to describe:
- Any treated diamond (see Definitions);
 - Any diamond simulant (see Definitions);
- A.8.30 The word 'natural' must not be used to describe any diamond simulant if the diamond simulant is not a naturally occurring mineral or compound.

BRILLIANT, BRILLIANT CUT AND FULL CUT

- A.8.31 The words 'Brilliant', 'Brilliant Cut' and 'Full Cut' must only be used to describe a round diamond that has at least 32 facets plus the table above the girdle and at least 24 facets below it.

GOLD, PLATINUM GROUP METALS, SILVER AND COLOURED GEMSTONES

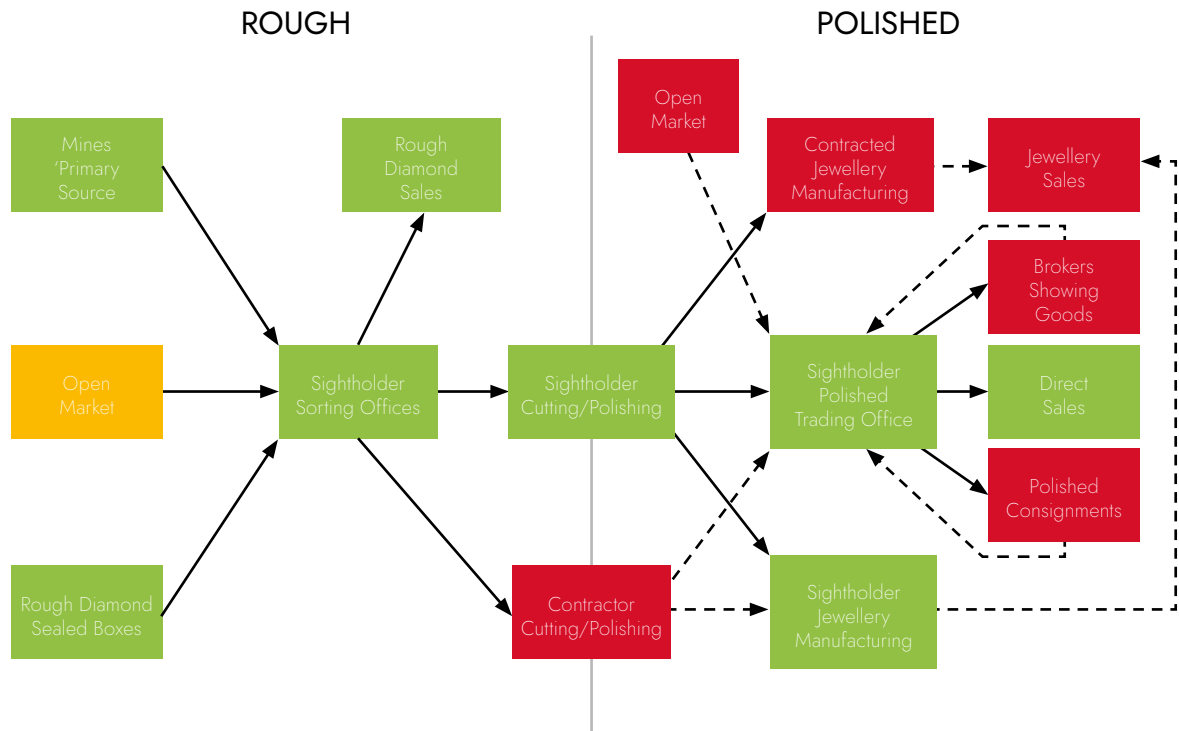
- A.8.32 If you are an RJC member and your business activities include gold, silver, PGM and/or coloured gemstones, refer to the RJC Code of Practices and Standards Guidance.

SUPPLY CHAIN SYSTEMS

- A.8.33 Factory controls must be implemented. These should contain effective and detailed policies, procedures, security, monitoring and training to avoid "switching" on the factory floor. For more information, please refer to the Product Security section (A.7) of the BPP Requirements.
- A.8.34 A pipeline risk assessment must be created for the group. The longer the pipeline the greater the risk, creating increased opportunity for undisclosed synthetic diamonds to be exchanged for natural diamonds or added into parcels intended for clients. It is a requirement that all groups map out their diamond pipeline and identify the areas that are at risk of contamination.
- A.8.35 Once identified, all contamination points must be assessed and labelled low, medium or high risk.
- A.8.36 Policies, procedures and training programmes should be established to address each identified contamination point, procedures should include testing for high risk areas, and the process for managing test referrals should be made available to clients. Testing must be carried out using relevant and effective detection equipment, either in-house or out-sourced to a qualified service provider, at least once at a point in the process where there is no longer risk of contamination.

How to conduct your Pipeline Risk Assessment:

The diagram below further illustrates how to conduct your Pipeline Risk Assessment and establish the level of risk.



Low Risk: if the group/entity/facility is buying rough directly from primary sources, it can be confident that the mined parcels are natural diamonds; therefore no further action is required.

Medium Risk: buying rough from the open market is a medium risk contamination point. Unprocessed synthetic diamonds are easily identified with the naked eye and so this contamination point could be rightly addressed through policy, procedure and training. For example in this case, the procedure could require that all members of the rough purchasing team are trained in identifying the different characteristics between unprocessed synthetic diamonds and rough natural diamonds. Buying polished diamonds from the open market could also be medium risk if your supplier has auditable systems in place to ensure that his contamination points are effectively addressed

High Risk: this is the only level of risk where testing goods is a requirement, Polished diamonds coming in to a group's/entity's/facility's pipeline from an external source may be considered high risk contamination points. For cases like these, stronger procedures are required to protect your pipeline; these must include a form of testing. Testing could be in house or through the use of external testing platforms and depending on the size ranges could be conducted through sample testing. See the guidance on sample testing to determine sample sizing.

A.8.37 In accordance with the guidance of the World Federation of Diamond Bourses (WFDB) and the WFDB Charter, the following assurances should be given on all invoices and memos:

“The diamonds herein invoiced are exclusively of natural origin and untreated based on personal knowledge and/or written guarantees provided by the supplier of these diamonds.”

“The diamonds herein on memo are exclusively of natural origin and untreated based on personal knowledge and/or written, guarantees provided by the supplier of these diamonds.”

Stronger assurances should be given on invoices where all goods are either still in their natural rough form or are able to be fully tested prior to sale; the following text is proposed for these cases:

“On behalf of [group name], and with its full authority, I declare by way of this written assurance that the diamonds [invoiced/sent by memo] and contained herein are exclusively natural diamonds meaning that the referenced [parcel/box] contains no synthetic diamonds or diamonds that have been treated.”

A.8.38 Established policies, procedures and training programmes must be reviewed from time to time to address evolving disclosure risks.

For further guidance please refer to the Standard Guidance on Disclosure and the Disclosure Practice Note documents available on the SMART System.

CONTRACTORS

A.8.39 Contractors should implement systems to keep each client’s diamonds separate, ensuring that the polished yield originates from the rough diamonds that are supplied by each client.

A.8.40 Off-site contractors must provide the following guarantee on all invoices/memos to each client that the polished yield being returned originates from the original rough diamonds provided for manufacturing:

“I (contractor company name) hereby guarantee that the polished diamonds in this parcel are the full yield from the rough diamonds received from (group company name).”

A.9 MELEE ASSURANCE PROTOCOL

A.9.1 The section applies to any group/entity/facility that purchases, trades, retails and/or manufactures rough and polished diamonds that are 0.08 carat and below.

A.9.2 A pipeline risk assessment for the group should be undertaken for diamonds that are 0.08 carat or below. All contamination points must be assessed and labelled as high, medium or low risk.

A.9.3 Procedures must be developed for each contamination point to ensure that the natural diamond pipeline remains sealed, including effective measures to identify and mitigate all levels of risk.

A.9.4 For all identified high risk areas, full testing is required.

A.9.5 Sample testing is required for identified medium risk areas. Please refer to the Disclosure Practice Note for guidance on sample sizes.

A.9.6 Procedures should include the process for managing test referrals and should be made available to clients. Testing must be carried out using relevant and effective detection equipment, either in-house or out-sourced to a qualified service provider, at least once at a point in the process where there is no longer risk of contamination. Auditable systems must be in place to ensure that from time to time all policies, procedures and training materials are reviewed to address evolving risks.

A.9.7 All contractors participating in the Melee Assurance Protocol must be declared on the SMART System and signed off by a Key Individual.

A.9.8 A procedure must be implemented to ensure that any off-site contractors hired to manufacture diamonds 0.08 carat and below are declared on the SMART System and participate in the BPP Assurance Programme.

A.9.9 Annual internal audits must be conducted by the BPP Manager or equivalent at the premises of all off-site contractors being used to manufacture diamonds for the Melee Assurance Protocol to verify that their procedures meet the requirements of this Protocol. Completion of the contractor Tier B BPP Workbook satisfies this requirement.

A.9.10 Where off-site contractors have been employed to manufacture diamonds that are 0.08 carat and below, the end product shall be returned in tamper-evident packaging.

CONTRACTORS

- A.9.11 Contractors manufacturing diamonds that are 0.08 carat and below should implement systems to keep each client's diamonds separate, ensuring that the polished yield originates from the rough diamonds that are supplied by each client.
- A.9.12 Off-site contractors manufacturing diamonds that are 0.08 carat and below must provide the following guarantee to each client that the polished yield being returned originates from the original rough diamonds provided for manufacturing:
- "I (contractor company name) hereby guarantee that the polished diamonds in this parcel are the full yield from the rough diamonds received from (group company name)".**
- A.9.13 In addition, off-site contractors must provide the following guarantee to clients that product security systems are in place to avoid theft or substitution of goods that are 0.08 carat and below:
- "I (contractor company name) hereby guarantee that the factory has adequate controls, systems and procedures in place to prevent theft and substitution of diamonds, while ensuring the safety and security of all employees".**
- A.9.14 Off-site contractors must return goods that are 0.08 carat and below in tamper-evident packaging as provided by the client.

A.10 SUPPLY CHAIN MANAGEMENT/BEST ENDEAVOURS

- A.10.1 Programmes and/or procedures, including risk assessments, shall be established to address compliance with the BPP Assurance Programme by business partners such as contractors, sub-contractors, suppliers, clients, agents and security providers that are directly involved in the mining, handling, manufacture and sale (or purchase as applicable) of diamonds and/or diamond jewellery. Due diligence that may have been undertaken on areas such as human rights and forced labour can be incorporated into the risk assessment. Evidence of commitment to responsible business practices through certification such as SA8000, ISO14001 and RJC could be taken in to consideration when addressing the reputational risk posed by a relationship with a business partner.
- A.10.2 The group/entity/facility will need to demonstrate that they have taken appropriate action to satisfy the requirement to use Best Endeavours to ensure the commitment of Non-Substantial Contractors to comply with the BPP (the Best Endeavours Requirement).
- A.10.3 Such actions must include providing relevant Contractor entities with a copy of the BPP as well as information on the practical implementation of the BPP (for example, copies of the BPP Requirements and the BPP Workbook). Other appropriate actions could include, but are not limited to:
- Offering Contractor entities assistance on the implementation of the BPP Assurance Programme;
 - Obtaining a contractual undertaking from the relevant Contractor that it will comply with and implement the BPP Assurance Programme, including an undertaking by the group/entity/facility to carry out assessments and report the results of such assessments to the Sightholder or other participant in the BPP Assurance Programme;
 - If appropriate, and with the consent of the Contractor, carrying out third-party assessments at intervals and a basis to be agreed between the parties.
- A.10.4 Each relevant group/entity/facility will need to provide written evidence of the actions it has taken to satisfy the Best Endeavours Requirement.
- A.10.5 Each relevant group/entity/facility will have access to the results of their Substantial Contractors' verification visits and if required, must be able to demonstrate working actively to assist in implementing any required corrective action.
- A.10.6 All employees and visitors to the group/entity/facility are required to comply with the group/entity/facility policies, systems and procedures relevant to the BPP Assurance Programme.
- A.10.7 If group/entity/facility is an RJC member and its business activities include gold, silver, PGM and/or coloured gemstones, refer to the RJC Code of Practices and Standards Guidance.

A.11 PROVENANCE CLAIMS

- A.11.1 Groups/entities/facilities will need to review and confirm if they make claims or statements to consumers or other businesses on practices in their supply chain and the origin or source of diamonds, synthetic diamonds, gold and/or platinum through the use of descriptions or symbols. Advertising, marketing and other sales-related documentation including product invoices, should be used to establish if this section is relevant. Whilst provenance claims are voluntary, if they are being made (intentionally or not), they must meet all applicable BPP Requirements.
- A.11.2 Group/entities/facilities shall refer and comply to the RJC Code of Practices and Standards Guidance for information on what type of statement meets the definition of a provenance claim. As aligned to the RJC, provenance claims can include (but are not limited to) claims which:
- Trace materials back through the supply chain to its origin (for example through invoices from the mine or producer of origin)
 - Verify the sources or practices related to the material
 - Relate to the materials, sourcing or practices that go beyond existing BPP and/or RJC requirements.
- A.11.3 Each relevant group/entity/facility will need to have systems and provide documented policies/procedures or requirements to validate that the provenance claim(s) is/are truthful and substantiated.
- A.11.4 All provenance claims made by the group/entity/facility must be disclosed on the SMART System Group Profile Page and included in all applicable BPP Workbooks.
- A.11.5 Groups/entities/facilities wishing to make provenance claims about the goods they purchase from DTC must ensure they comply with the "Guidance: Provenance Claims: "Diamonds from DTC" which is available on the SMART System and www.dtc.com. Participation and compliance with the Diamond Pipeline Integrity Specification will be deemed sufficient evidence of meeting the requirements in the Diamonds from DTC Guidance.
- A.11.6 Claims that relate to existing BPP Requirements will be audited as part of the relevant BPP provision and will not be verified as provenance claims. This includes (but is not limited to) claims on:
- Adhering to the Kimberley Process Certification Scheme or World Diamond Council System of Warranties.
 - Sourcing in accordance with the OECD Guidance.
 - Testing for undisclosed synthetic diamonds or claims that the diamonds are natural.
- A.11.7 Each relevant company/entity/facility shall maintain appropriate record keeping procedures, and verify that the criteria or requirements are met.
- A.11.8 Each relevant group/entity/facility should appoint an appropriate senior manager(s) to be responsible for managing and overseeing compliance of all provenance claims. This person shall also be responsible for ascertaining which employees require training on the provenance claim(s). These employees must be able to demonstrate how they respond to product enquiries and should be aware of their accountabilities demonstrating a full understanding of the provenance claim(s) made. All documentation related to training shall be maintained, including but not limited to: written procedure, training materials and training register.
- A.11.9 The group/entity/facility shall make available to all interested parties further information on any provenance claims being made and shall ensure they have access to a complaints or grievance mechanism. Grievance mechanisms shall be clearly documented, describe what type of complaints are and are not admissible, outline how complaints are investigated and addressed, and be easily available to interested parties.
- A.11.10 For sales directly to consumers, details about provenance claims and systems to achieve them must be made available at point of sale and on the group/entity/facility website. In doing so, the group/entity/facility must ensure that consumers have access to all the information they may need to make their purchasing decision. Consumers must be able to understand all the claims the group/entity/facility is making and what is being done to uphold these.

A.12 GRADING AND APPRAISAL

Diamond Grading – Defining the characteristics of a diamond i.e. cut, colour, clarity and carat weight.

Appraising – Providing an estimation of monetary value using the composition, identity, characteristics and qualities of a diamond or piece of diamond jewellery.

Grading and Appraisal reports can be used for insurance purposes and could impact the consumer's decision to purchase diamonds and/or diamond jewellery. It is therefore imperative that the content of the reports is transparent, accurate and does not mislead the consumer.

If independent grading, analysis and/or appraisal reports are being generated by the group/entity/facility their systems must be based on scientific methodology and be sufficiently thorough and comprehensive to produce valid and reproducible results.

If independent place of origin reports for coloured gemstones are being generated by the group/entity/facility their systems must be based on scientific methodology to ensure consistency of the determination of origin and shall include detection of synthetics and/or treatments as part of the determination.

- A.12.1 If diamond grading reports are generated by the group/entity/facility a content review should take place to ensure that all reports explicitly state whether or not the assessment includes the detection of synthetic diamonds and/or treatments. A system should be put in place to ensure that the correct disclosure is included in all grading and analysis reports, and whether this has been carried out for all stones.
- A.12.2 The relevant legislative requirements and professional standards should be taken into account when appraisal reports are generated. The name of the consumer for whom the report is intended and a statement of the purpose of the appraisal should be included when these reports are generated for end-consumers.
- A.12.3 Any diamond grading or appraisal reports created for end consumers that could be interpreted as being independent should disclose any relevant vested interests in the sale of the jewellery product held by the grader or appraiser. A vested interest would be defined as any situation where the content of the report enables the group/entity/facility to obtain direct or indirect commercial or financial gain. Policies and procedures should be in place to ensure full disclosure is provided in any grading or appraisal report.
- A.12.4 Any appraisal documentation generated by the group/entity/facility should not be represented as 'independent', and it must be readily apparent to the customer. Systems and processes should be in place for groups/entities/facilities using appraisal reports in selling diamonds/ diamond jewellery to ensure compliance with legislative requirements and international standards concerning misleading representations and deceptive marketing practices. The reason for a difference between the sale price and appraisal must be included in writing in the Appraisal Report when selling diamonds or diamond jewellery.
- A.12.5 The Jeweller's Vigilance Committee's Appraisal Task Force Recommended Minimum Guidelines for Insurance Replacement Costs Estimate documentation for Jewellers should be studied by appraisers and retailers who provide insurance replacement cost estimates, in particular those working in the United States.

B SOCIAL RESPONSIBILITIES

B.1 EMPLOYMENT

B.1.1 De Beers Group is committed to the pursuance of the provision of the highest standards of employment conditions. The BPP Assurance Programme requires Sightholders and other BPP participants, and their applicable Contractors, to make identical commitments.

B.1.2 All businesses should pay particular regard to the following elements:

- All workers will be employed in accordance with applicable law.
- The work performed should be based on recognised employment relationships. Obligations to workers should not be avoided by the use of alternative hiring arrangements, such as apprenticeship schemes where there is little or no attempt at imparting skills.
- Payment and remuneration details shall be agreed before commencement of employment and documentary evidence to confirm contractual agreements shall be supplied by the employer before employment starts, in a language that is understood by the worker.
- Payments to workers will be made on a regular and pre-agreed schedule, by bank transfer, cash or cheque and will be accompanied by an understandable wage slip detailing all payments and deductions.
- Any changes to the working hours or wages paid should be fully communicated to workers with sufficient notice, and in accordance with the terms and conditions of their employment contract, and where relevant, with national laws. No changes should result in workers being paid less than minimum wage.
- Cash or cheque and will be accompanied by an understandable wage slip detailing all payments and deductions.
- If employment agencies are used, the group/entity/facility must have systems in place to ensure equitable compensation and workplace standards and ensure all workers receive their wages.
- Businesses should keep appropriate records such as working hours, payslips, benefits, piece-rate etc. for all workers.
- Wages and benefits paid for a standard working week shall at least be paid at a minimum national legal standard and these should be adequate to cover basic needs and provide some discretionary income. These provisions constitute minimum and not maximum standards and this should not prevent companies from exceeding these standards.
- Deductions from wages must comply with the law and be calculated following a documented process that is clearly communicated to workers.
- Deductions will not be made without following due process. For example, deductions such as pension contributions etc are allowed but deductions due to equipment requirements or being required to purchase personal protective equipment are not. Deductions must not result in the workers being paid below minimum wage.
- In the event workers are unable to work due to reasons outside of their control (eg government mandated closures), workers should be compensated in accordance with the law. Where there is no legal requirement, or the legal requirement stipulates no payments need to be made to workers during these type of closures, employers should use reasonable endeavours to pay at least minimum wage. Where workers are able to seek employment support (eg furlough scheme) from national or local governments, the employer shall ensure workers are provided with sufficient information on how to access such schemes.
- There should be no limitations placed on the disposal of income by workers, nor coercion to make use of group/entity/facility stores or services where these exist, where there is no alternative excessive rates must not be charged. In the case that partial payment of wages in the form of allowances has been agreed and appropriately negotiated on behalf of the worker, these allowances should be for the personal use of the worker and his/her family and the value attributed to such allowance should be fair and reasonable.
- Where wage advances or loans are provided, any interest and repayment terms must be transparent and fair.

- Working hours (including overtime), holidays and rest intervals shall comply with national legislation regulations, or if no applicable law exists three weeks paid annual leave shall be provided and at least one uninterrupted work break if they work longer than six hours. Workers shall be entitled to be provided with at least one day off for every seven- day period, or equivalent where collective bargaining agreement or applicable law allows for work time averaging. Special leave or working time arrangements for employees with family responsibilities apply to all regardless of gender.
- If workers operate on a shift or rotational working period basis, such as 12 days on followed by two days off, workers shall be entitled to be provided with the equivalent amount of time to at least one day off for every seven-day period.
- Employers should ensure that workers do not work in excess of the national limit of hours per week on a regular basis and that the normal working week, not including overtime, must not exceed 48 hours. Overtime should be voluntary, should not be demanded on a regular basis and should always be compensated in compliance with national legislation. The sum of normal working time and overtime must not exceed 60 hours unless defined otherwise in applicable law or collective bargaining agreement or unless there are exceptional circumstances (such as production peaks, accidents or emergencies).
- Where overtime is offered, it should not be compulsory and any refusal by a worker to work overtime must not result in punishment, retaliation or penalisation in any way.
- Workers should be compensated for absence due to illness, including where government guidance requires them to self-isolate for health and safety purposes, in accordance with applicable national laws.
- Religious festivals should be respected.
- Any crisis responses to unforeseen events which may impact the employment rights of workers should be implemented in ways which continue to respect the fundamental principles and rights at work as defined by international, national and local labour standards. This includes identifying, preventing, mitigating and accounting for adverse impact on labour rights. For example, this could include ensuring at least minimum wage levels are protected, redundancies and layoffs are used as a last resort and if unavoidable, are managed in accordance with national laws and principles, consulting and informing workers as early as possible on any changes to their employment. Times of crisis could include unforeseen changes of circumstances (due to external factors) whose effects could not be avoided by appropriate measures, and which may create difficulties in performing regular contractual obligations.
- Employers should adopt policies relating to redundancy or layoffs, which should be implemented in accordance with the relevant national laws as applicable. Policies should include the company's approach to redundancy which can include how it intends to keep numbers of redundancies to a minimum, ensure workers are fully consulted (either individually or through their representatives), that the selection for redundancy is based on clear and fair criteria, and that where redundancy cannot be avoided any severance pay, notice and/or payment in lieu of notice of is provided. The policy should be endorsed at the highest levels of the organisation and communicated to all workers.
- Where the group/entity/facility does undertake redundancies or layoffs, it shall ensure, and be able to evidence, in accordance with national laws as applicable, that:
 - Any redundancies or layoffs were conducted in ways that align with its policy and relevant national laws and with full respect to the human rights of workers.
 - Workers impacted were provided with a valid reason for such termination, which is connected with either the capacity, conduct of the worker, or based on the operational requirements of the undertaking. Reasons which do not constitute a "valid reason" include, but are not limited to: union membership or participation in union activities, seeking office, acting or having acted as a workers' representative, filing of a complaint, temporary absence from work (illness, injury, parental/caring leave), conduct or performance when due disciplinary processes have not been followed, any discriminatory reason.
 - Severance payments are calculated and made in accordance with national laws, and if not stipulated in law, with reference to the length of service and level of wages.
 - Reasonable period of notice is given, or compensation in lieu of.
 - Workers (either individually or through their representatives) were consulted and given the opportunity to make representations which seek to avert or minimise the redundancies or lay-offs proposed and/or the adverse effects of any terminations on workers.
- Where workers are provided with housing, medical care or food, these should be of a good standard and the principles of respect and equality for the dignity of individuals and their families should be applied.

- When required, recognition should be given to the existence, membership and lawful activities (consistent with recognised international good practice and norms) of worker representative bodies, and worker representatives should be given access to carry out their responsibilities/ functions and businesses should not act in any way that undermines this principle.
- The employer should respect the right to freedom of association or collective bargaining without interference or negative consequences. The employer should ensure that those workers seeking to join or form an organisation of their own choosing are not subject to any form of harassment, discrimination or discipline as a result.
- Where the right to freedom of association and collective bargaining is restricted under law, no steps should be taken to hinder the development of parallel means of free association and collective bargaining.
- Where collective bargaining agreements exist the agreed terms will be adhered to.
- Arbitrary dismissal procedures for individuals should be avoided and in the event of major changes in operations reasonable notice of such changes to the appropriate authorities and representatives should be made in order to minimise adverse employment effects.
- Information regarding employment needs and working practices and conditions should be provided according to national law in order for meaningful negotiations to occur between worker representatives and the business enterprise.

B.2 HEALTH AND SAFETY

B.2.1 De Beers Group is committed to the pursuance of the highest standards of health and safety, and the provision of a safe and healthy working environment for individuals, which includes minimising the risk of contagious diseases in the workforce, in accordance with the national minimum requirements of the relevant countries and with due consideration to the international standards set out in International Labour Organisation (ILO) Conventions.

The following provisions constitute minimum and not maximum standards and should not prevent companies from exceeding these standards. It should be noted that where national laws stipulate general standards for companies, but certain (for example, small) businesses are provided exemptions, such as being subject to lower or no set standards, De Beers Group encourages compliance with the higher general standards.

- B.2.2 Top management shall demonstrate commitment and general responsibility for health and safety and a clear description shall be made available of the formal agreements and communications between employer and worker representatives on issues related to health and safety. The risk of workplace hazards must be assessed and controls implemented to minimise the risk of accidents and injury to employees.
- B.2.3 Investigation of work-related accidents (and diseases, contagious or otherwise), fatalities and record keeping of incidents, their causes and subsequent remedial action, should be undertaken to prevent repetition.
- B.2.4 Co-operating fully with workers' representatives for health and safety and appropriate safety authorities to provide on-going programmes of improvements and solutions to potential hazards is encouraged and the company should provide a mechanism for workers to raise and discuss health and safety issues with management.
- B.2.5 Policies and procedures should be established to ensure that workers are not under the influence of, or abusing, drugs, alcohol and/or illegal substances
- B.2.6 A health and safety risk assessment should be undertaken, including a contagious and infectious diseases' transmission risk assessment where applicable, to ensure the workplace can operate in a secure way. Workers should be consulted and be able to provide input into the risk assessment (either individually or through a relevant committee) and the outcome of the risk assessment, and any measures taken should be shared and communicated with workers in a format they are able to understand. The risk assessment should be reviewed periodically, and at least when the group/entity/facility is made aware of new risks or considerations.
- B.2.7 All workplaces shall be made secure to control the risk of the transmission of any contagious and infectious diseases, where applicable.
- B.2.8 Any preventative contagious and infectious diseases measures should be documented in writing, and taken in accordance with national public health measures, guidelines, legislation and regulations. Where these do not exist, preventative measures can include implementing social distancing, increased cleaning, hygiene and handwashing, provision of free personal protective equipment (PPE) and instructions on how to use appropriately, working from home where deemed possible, shift staggering, temperature checks

etc. Specifically, the group/entity/facility should identify vulnerable workers at greater risk and implement appropriate measures that seek to reduce or control their risk of contracting contagious and infectious diseases, where applicable.

B.2.9 The group/entity/facility shall monitor the implementation and effectiveness of contagious and infectious diseases measures on an ongoing basis, where applicable.

B.2.10 There should be evidence of compliance with national laws on health and safety and with the following requirements:

- Clear information in both written and oral forms and in languages that are familiar to workers should be provided about health and safety standards relevant to workers' activities and based on best practice standards from across the industry. Special hazards, tasks or conditions of work should be highlighted together with the relevant measures and procedures provided, including any relevant training, to protect individuals.
- Appropriate procedures for dealing with emergencies and accidents should be clearly available.
- Personal protective clothing (with instructions) should be provided as appropriate, including specific consideration given to gender and general employee needs as applicable, and free of charge to the workers and verification should be carried out that it is current and correctly worn or used.
- First aid equipment must be regularly checked and updated and in compliance with national law.
- Appropriate training in first aid should be given to nominated individuals in the workplace. Workers should receive regular health and safety training and information which should be repeated for new or reassigned workers.
- Businesses should have policies to actively prevent accidents or injury by minimising as far as is practicable the possible causes of hazards. Monitoring the working environment and health of workers exposed to hazards should be undertaken regularly. This should include consideration of workers' reproductive health where they are working with hazardous materials that may pose a risk.
- Workers have the right and responsibility to remove themselves from work situations in which reasonable concern over imminent and serious danger to life or health is apparent or where hazards are uncontrolled and to bring these situations to the attention of those in imminent risk and to the management. They should not be subjected to any consequences as a result of this action nor should they be required to return to their work environment as long as the hazardous situation continues.
- The safe number of workers per room should be established in factories so that it is not injurious to the health of the workers whilst working and is safe in the event that emergency evacuation procedures or regular safety drills need to be implemented. This should in any event at least conform to national legislation. Such action should not prejudice remuneration or employment.
- There must be provision of adequate means of escape for use in cases of emergency (these must be clearly marked, unlocked and unblocked). This includes provision of adequate gangways in relation to the number of workers and spacing between machines and equipment shall not be such that means of escape are hindered.
- Where dormitories are provided, these should comply with applicable laws, particularly with respect to fire safety. Where no applicable law exists, best practice approaches should be adopted to ensure the safety of the residents.
- Emergency evacuation procedures should be communicated to all workers and be regularly tested for effectiveness.
- All workplaces shall be adequately constructed to meet accepted national building regulations (including flooring, ceilings, staircases, communal or shared areas, etc.).
- Appropriate lighting should be provided for the task to be performed and this should include provision of emergency lighting.
- All electrical wiring shall be installed and checked to meet national electrical wiring and safety regulation; all loose wires and open electrical switchgear and fuse boards should be made safe.
- All equipment shall be installed to a high quality of electrical and mechanical safety, free from any health hazard.
- All machinery must only be used with adequate safeguards as per legislative requirements; for example, laser machine doors should be interlocked and fitted to safeguard operatives and those working in the vicinity from exposed or reflected beams when in operation.
- Use and disposal of chemicals (and other waste) must be effectively controlled and evidence of operational procedures and adequate and safe facilities for disposal and/or neutralising of used chemicals (and other waste) prior to disposal shall be displayed.

- Suitable and sufficient first aid provisions and appliances including fire-fighting equipment shall be available in all workplaces and these shall be accompanied by instructions understandable to all workers. There should be a proportionate number of men and women trained on handling fire safety equipment and first aid provisions that accurately reflects the gender balance of the workforce. Workers with work-related injuries must be assisted to obtain physical access to medical treatment in accordance with local law and company policies.
- Suitable and sufficient fire alarms and other fire safety devices shall be installed in all workplaces.
- Of particular importance will be the provision of a working environment, and onsite housing where relevant, with acceptable conditions appropriate to the tasks performed with regard to noise, heat, cleanliness, air quality and ventilation. This will include:
 - Extraction or appropriate ventilation of dust from from sawing, 4P diamond cutting machines and polishing wheels to minimise exposure to airborne particles. In practice this requires that diamond impregnated scaifes must be cobalt free;
 - Extraction and neutralisation of chemical acid fumes, including those generated by cleaning diamonds, whitener coating in scanning & mapping processes, cleaning of stones after scanning & mapping processes, before they are put into the atmosphere in the context of the environmental policy;
 - All chemicals and cleaning materials shall be adequately and appropriately labelled and stored;
 - Decibel levels, temperatures and air quality will be compliant with national legislation;
 - Provision of adequate hygienic washing and toilet facilities commensurate with the number and gender of staff employed;
 - Provision of drinking water and sanitary facilities for food storage;
 - Evidence of routine daily cleaning of premises;
 - Childcare and breastfeeding facilities in accordance with applicable law;
 - Suitable conditions for pregnant or nursing women, or alternative working arrangements to avoid unsuitable workplaces.

B.2.11 All diamond-impregnated scaifes used for cutting and polishing should be guaranteed as cobalt-free by the supplier.

B.2.12 Where the group/entity/facility uses and stores Hydrofluoric Acid, it will do so in accordance with the national standard or related operating protocols; or follow best practice where no legislation exists.

B.2.13 Where the group/entity/facility uses and stores Hydrofluoric Acid in its business processes, the group/entity/facility shall conduct an annual bow-tie risk assessment, and maintain an emergency preparedness response and recovery plan in reaction to all reasonable foreseeable emergency scenarios.

B.2.14 Where the group/entity/facility uses and stores Hydrofluoric Acid in its business processes, the group/entity/facility shall provide effective training to all relevant workers, and maintain records. The group/entity/facility shall develop and document robust decontamination procedures to respond to any hazardous incident involving Hydrofluoric Acid.

B.3 NON-DISCRIMINATION, HARASSMENT, BULLYING, AND DISCIPLINARY PRACTICES

B.3.1 No worker should be discriminated against on the basis of race, colour, ethnicity, caste, national origin, religion, age, disability, genetic information, physical appearance, gender, marital status, parental or pregnancy status, family or caring responsibilities, sexual orientation, HIV or other health status, membership of worker representative bodies or political affiliation or any criteria that are unlawful at any level of the organisation including the corporate governance body or any other personal characteristics unrelated to the requirements of the work.

B.3.2 Discrimination can mean distinction, exclusion or preference; and, therefore, policies and procedures should exist to take into account issues relating to all aspects of employment, including recruitment, wages, benefits, promotions, training, transfer, termination and retirement.

B.3.3 Mechanisms and procedures to address all forms of discrimination, bullying, harassment and/or violence in the workplace, including risk assessments where required, should be appropriately established and communicated, including any appropriate training for identified personnel and is delivered on a regular basis. The mechanism should ensure appropriate senior management oversight and ensure, where relevant, participation in worker's committee/s.

- B.3.4 There should be equal opportunities for all individuals who are 'fit for work' across all aspects of employment, including recruitment, wages, benefits, promotions, training, transfer, termination, and retirement.
- B.3.5 Comparable wages should be paid to all employees for carrying out work of equal value and a process should be in place to assess and remediate any potential wage disparity that discriminates against any category of worker.
- B.3.6 All forms of violence and harassment in the workplace are prohibited, including but not limited to bullying; corporal punishment; harsh or degrading treatment; gender-based violence; sexual or physical harassment; mental, physical, verbal or sexual abuse; retaliation; coercion; and intimidation. Both direct and indirect harassment in any form is not acceptable in workplace facilities. The group/entity/facility shall ensure that employees are treated with dignity and respect and are not subjected to harassment or violence, or threatened with these towards themselves, their family or colleagues.
- B.3.7 Disciplinary and grievance procedures (or an equivalent procedure which meets local law) should be established and communicated to all employees. Any policy should be written and include clear, confidential and unbiased procedures as well as an appeals process.
- B.3.8 All disciplinary and grievance processes, including any investigations and outcomes of decisions regarding any complaint raised, should be recorded and records maintained as appropriate, whilst maintaining respect for data privacy, confidentiality and anonymity.
- B.3.9 Any person raising a grievance, including relating to discrimination, violence and/or harassment, should not be penalised or intimidated or discriminated against by group/entity/facility.
- B.3.10 The selection of individuals responsible for management and assessment of grievances should be conducted sensitively to the situation and appropriately to ensure gender balance.
- B.3.11 Deductions from wages as a disciplinary measure shall not be permitted, as provided by national law.

B.4 CHILD LABOUR

- B.4.1 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.'

- B.4.2 The following requirements must be met:
 - Subject to the paragraph immediately below, the minimum age for admission to employment in any occupation shall not be less than 15 years or the age of completion of minimum compulsory schooling, whichever is greater;
 - Notwithstanding the paragraph above, companies operating in countries whose economy and educational facilities are insufficiently developed may, after consultation with the governments and workers involved, initially specify a minimum age of 14 but shall transition to a minimum working age of 15;
 - The minimum age for admission to employment, which by its nature or circumstances, (for example if it takes place at night or in hazardous conditions), is likely to jeopardise the health, safety or morals of young persons, shall not be less than 18 years;
 - The group/entity/facility shall not engage in or support any form of child slavery, debt bondage, trafficking of children, forced child labour or use of children in armed conflict;
 - Vocational training, technical education or work done in schools is allowed where such work is carried out in accordance with conditions prescribed by the competent authority, and where it is an integral part of: a course of education or training for which a school or training institution is primarily responsible; a programme of training mainly or entirely in an undertaking, in which the programme has been approved by the competent authority; or a programme of guidance or orientation designed to facilitate the choice of an occupation or of a line of training;

- Policies and programmes of action must be developed to provide for the transition of any child found to be performing child labour to enable him or her to attend and remain in quality education or vocational training until no longer a child. Such programmes must also assess the impact of this transition on the social and economic situation of the child and his or her family and include measures for the provision of suitable alternative opportunities and a review of the approach to avoiding child labour to identify root causes and implement controls to prevent recurrence.
- If any children are present in the workforce, policies and procedures must be developed to ensure that the child's combined hours of daily transportation, school and work time do not exceed 10 hours per day, and to ensure that no child is employed during school hours;
- Policies and procedures in respect of child labour shall be effectively communicated to personnel and other interested parties.

B.5 FORCED LABOUR

Human trafficking is the movement of an individual across international borders or within a country and can result in forced labour. Groups/entities/facilities will be held accountable if they source goods and/or use services provided by exploited workers. Relationships with third-party recruitment agencies should be monitored as they expose a group/company/facility to the risk of human trafficking.

- B.5.1 The Universal Declaration of Human Rights states 'no-one shall be held in slavery or servitude' and 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'. This requirement and definition must be adhered to at all times.
- B.5.2 The selection and recruitment of workers must be carried out to industry-wide standards and there should be no forced, bonded or involuntary prison labour.
- B.5.3 The group/entity/facility must not engage in or support human trafficking or any other type of deceptive recruitment and/or bonded labour practices and communicate this requirement to labour recruiters, agencies and providers with whom they work. The group/entity/facility shall monitor their relationships and remedy negative human rights impacts as they may occur.
- B.5.4 Workers should not be required to lodge deposits or identity papers with their employers and they should be free to leave their employer after reasonable notice at which point all necessary documentation and assistance should be given to them.
- B.5.5 Where the group/entity/facility operates hostels for workers, these workers (and their dependants, as applicable) should have reasonable freedom of movement within the accommodation to come and go.
- B.5.6 The group/entity/facility shall provide effective training to relevant employees to identify and address risks of human trafficking in its own business and in its supply chain.
- B.5.7 Risks of human trafficking within the company, from suppliers, contractors and through recruitment agencies, shall be assessed and addressed during the selection and recruitment process.
- B.5.8 The group/entity/facility shall have processes to identify human trafficking activities internally and/or within third-party recruitment agencies employed by the entity.
- B.5.9 The group/entity/facility shall take measures to identify and address human trafficking risks in its supply chain.
- B.5.10 The group/entity/facility shall meet all relevant and applicable legislative requirements with respect to human trafficking, such as the Modern Slavery Act 2015 (UK).

B.6 HUMAN RIGHTS

- B.6.1 Groups/entities/facilities have a responsibility to respect the human rights of all people they encounter (including employees, contractor and supplier workers, customers, communities), including against internationally recognised human rights which at a minimum should be considered as those expressed in the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work.
- B.6.2 The group/entity/facility should have a documented policy, applicable to all people it encounters, endorsed at the highest level of their organisation. The policy shall:
- demonstrate commitment to respecting internationally recognised human rights expressed in the International Bill of Human Rights, the ILO Declaration on Fundamental Principles and observe the UN Guiding Principles on Business and Human Rights.
 - clearly address how the group/entity/facility respects human rights and remedies any adverse impacts.
 - be publicly available
 - be communicated internally and externally to all personnel, business partners and other relevant parties.
- B.6.3 All employees/workers should be equipped to understand the group's/entity's/facility's policies on human rights (e.g., through training), on issues that impact them, which could include (but not necessarily be limited to) human trafficking, harassment, discrimination and physical, sexual, racial, religious, psychological, verbal or any other form of harassment.
- B.6.4 The group/entity/facility shall ensure that each worker/employee shall be treated with fairness, equality, respect and dignity. Notwithstanding where these relate to other applicable BPP Requirements, the group/entity/facility should respect the human rights of all employees, including permanent, temporary and contractor workers.
- B.6.5 The group/entity/facility should give particular attention to the rights of all individuals it encounters (including employees, contractors, suppliers, customers, communities) who belong to group or groups which may be particularly vulnerable to adverse human rights impacts, including indigenous people, women, national, ethnic or religious minorities, children, LGBT+ people, people with disabilities and migrant workers.
- B.6.6 The group/entity/facility should establish appropriate due diligence processes which identify, prevent, and mitigate any actual or potential adverse human rights impacts across their workforce, geographic areas, business activities and business relationships.
- B.6.7 Due diligence processes should give equal consideration to civil and political rights (such as the right to freedom of association, the right to privacy, the right to be free from discrimination, the right to life and the right to be free from inhuman and degrading treatment) and economic, social and cultural rights (such as the right to an adequate standard of living, the right to just and favourable conditions of work and the right to safe and healthy working conditions). Due diligence processes could include conducting internal risk assessments, reviewing publicly available materials (e.g. reports by non-governmental organisations), engagement with civil society organisations, conducting interviews with stakeholders.
- B.6.8 Human rights due diligence processes should specifically include the engagement in meaningful consultation with potentially affected groups and other relevant stakeholders as appropriate to the size of the group/entity/facility and the nature and the context of the operation.
- B.6.9 The group/entity/facility should avoid causing or contributing to adverse human rights impacts and seek to prevent, mitigate and remediate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships. This applies even if they have not directly contributed to those impacts.
- B.6.10 The group/entity/facility must track and communicate annually with their stakeholders about how adverse impacts on human rights are addressed.
- B.6.11 The group/entity/facility should ensure that all affected groups and other relevant stakeholders (including employees, contractors, suppliers and communities) have access to an independent, appropriate, confidential and effective grievance mechanism. Whilst this can be part of an existing grievance mechanism, the group/entity/facility shall ensure that the grievance mechanism:
- is transparent and structured, allowing stakeholders to submit their grievances free of charge, without fear of reprisal, and if necessary, anonymously via third parties
 - includes a system for reporting, classifying, investigating, processing and managing a complaint or incident
 - establishes with clear accountabilities and responsibilities
 - includes a system for outcomes and resolutions to be communicated back to relevant stakeholders

- ensures that all affected groups and stakeholders are aware of the grievance mechanism and know how to access it
 - has monitoring and evaluation measures in place to assess the effectiveness of the mechanism
 - retains all appropriate records of investigations and outcomes.
- B.6.12 No worker should be subject to direct or indirect physical, sexual, racial, religious, psychological, verbal or any other discriminatory form of harassment or abuse, nor subject to intimidation or degrading treatment. Particular attention should be given to individuals or groups of individuals who are at heightened risk of becoming vulnerable or marginalised.
- B.6.13 The group/entity/facility will only use armed security personnel when there is no acceptable alternative to manage risk or to ensure the personal safety of employees, contractors and visitors to the Facility.
- B.6.14 Policies and procedures for security personnel will be established to ensure respect for the human rights and dignity of all people and to ensure the use of the minimum force proportionate to the threat.
- B.6.15 Security staff, managers and other key personnel should receive training on policies and procedures concerning all aspects of human rights relevant to operations. They should be regularly trained to recognise and action any risks, threats or abuses of human rights. Particular attention should be given to vulnerable individuals or groups of individuals and issues such as workplace gender-based violence and sexual harassment or abuse.
- B.6.16 Consideration of human rights performance should be a factor in any investment decision as well as the selection of suppliers/contractors.
- B.6.17 Where the group/entity/facility's business is provision of private security services to the jewellery supply chain they must be a certified member of the International Code of Conduct Association (ICoCA)

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

Artisanal and Small-scale Mining (ASM) refers to labour intensive mining, using minimal technology and financial resources. Sourcing from Artisanal Small-scale Mining producers could aid impoverished families and communities through providing employment. However, it also has a detrimental impact on the environment along with other issues such as health and safety, and forced/child labour. Requirement B.7 applies if your group/entity/facility sources diamonds, coloured gemstones, silver, PGM or gold directly from ASM sources.

- B.7.1 The group/entity/facility should perform a risk assessment or undertake due diligence in order to review the heightened risks associated with directly sourcing from Artisanal and Small-scale Mines.
- B.7.2 The risk assessment should include the assessment of risks of violence and armed conflict, forced labour, child labour, sexual violence, sexual slavery, unsafe working conditions, illegal transactions, uncontrolled mercury use, other significant environmental impacts amongst other risks.
- B.7.3 The group/entity/facility should establish a responsible sourcing policy and implementation strategy that defines a robust due diligence process that is able to identify and assess risks on an ongoing basis.
- B.7.4 The group/entity/facility should use best endeavours to reduce or avoid risks outlined in the due diligence or risk assessment.
- B.7.5 The group/entity/facility should use best endeavours to support the remediation of actual adverse impacts. This could include the establishment of an action plan that defines steps taken to address identified impacts.
- B.7.6 The group/entity/facility should seek opportunities to support the development of ASM communities and seek to understand fair commercial terms and offer these to all ASM suppliers.

C ENVIRONMENTAL RESPONSIBILITIES

Please note that this section has been developed to be applicable to all types of operation and as such different elements may apply depending on the scope of activities. The overriding objective is to ensure that key risk areas are covered and that the appropriate levels of controls are in place to manage potential effects of operations

Please note the addition of mandatory sub-sections C.2; C.3 and C.4. that specifically relate to climate change responsibilities. Answering questions in the corresponding sub-sections C.2, C.3 and C.4 in the BPP Workbook, and completing the Carbon Footprint Template Questionnaire, are mandatory requirements for Sightholders' participation in the BPP Assurance Programme. You will be able to continue to refer to Section E - Corporate Social Investment and Business Impact of the BPP Requirements and the BPP Workbook, for "other environmental" responsibilities over and above carbon and climate change responsibilities (e.g., water, waste, biodiversity etc.).

C.1 BEST ENVIRONMENTAL PRACTICE AND REGULATORY FRAMEWORK

C.1.1 In pursuance of the highest standards of environmental care and protection, commitments will be guided by international law and best practice voluntary norms on the following:

- Manage all issues of environment policy as integral parts of group/entity/facility business and planning.
- Establish an Environmental Management System, including:
 - Development of appropriate environment policies and programmes, monitoring their consistent implementation by accountable and adequately resourced personnel, and ensuring that these policies and programmes are communicated to all employees and on-site contractors, in an understandable format and language with training provided regarding environmental risks and controls.
- Foster awareness of shared responsibility and accountability for the environment among workers through a communication programme which embraces interaction and co-operation with all stakeholders.
- Nominate an individual with appropriate level of authority and responsibility to track environmental legislation and other related national or international frameworks to ensure control measures and improvement targets continue to enable compliance.
- Eliminate the use of chemicals and hazardous substances subject to international bans and phase-out due to their high toxicity to living organisms, environmental persistence, potential for bioaccumulation, or potential for depletion of the ozone layer and employ alternatives to other hazardous substances used in production processes wherever technically and economically viable.
- Maintain an inventory of hazardous substances at facilities and ensure accessibility to safety data sheets (or equivalent) with clear and active communication to employees of associated environmental risks where such substances are in use.
- Identify and manage significant wastes, emissions to air, land and water, dust and the use of potentially harmful substances so as to prevent pollution, including:
 - Quantification of wastes and emissions, manage and monitor trends and implement programmes to drive continuous improvement in environmental performance.
 - Apply the principles of reduce, reuse, recycle and recover to minimise environmental impact.
 - Discharge and/or dispose of wastes and emissions in compliance with applicable law, or where no such law, in line with international standards.
- Conduct regular environmental audits to evaluate compliance and effectiveness of the environment policy of the business and report the outcomes annually to the supervisory board/ management of the group/entity/facility.

C.2 CARBON FOOTPRINTING

De Beers Group measures and reports its direct and indirect carbon emissions according to the internationally accepted 'GHG Protocol' Standards.

This section should be responded to on behalf of your whole group of companies. Where you wish to provide specific details about carbon footprinting and carbon and climate commitments that an individual entity in your group is making, or the group/entity/facility within a specific jurisdiction, or within a specific sector of the value chain (e.g., all the factories in your group, or all the retail stores in your group) this should be articulated as such in the responses to the applicable BPP Workbook questions.

COMPLETING THE CARBON FOOTPRINT TEMPLATE QUESTIONNAIRE

- C.2.1 The **Carbon Footprint Template Questionnaire** (available in the Support > Resource Pack section of the SMART System) **must be completed per group** for the latest reporting year (using the most recent financial year's data) and uploaded to the 'Documentation for BPP Compliance' page, under section C.2..
- C.2.2 Table 1 in the **Carbon Footprint Template Questionnaire** must be completed by all groups. After completing Table 1, please refer to the **decision tree on page 2** of the Carbon Footprint Template Questionnaire and complete the relevant tables according to the decision tree.
- C.2.3 If you have provided Scope 1 and 2 and Scope 3 data in Tables 2a and 2b of the **Carbon Footprint Template Questionnaire**, then you do not need to complete Table 3 and can simply note 'carbon footprint data provided' in Table 3.
- C.2.4 Where the group is **not** yet capturing carbon footprint data, **completion of the Carbon Footprint Template Questionnaire is still mandatory**. In these cases, fields should be marked as 'not calculated yet' in Table 2a and 2b. If the group is capturing some data for certain aspects of its business, inclusions and exclusions must be noted as appropriate within the Carbon Footprint Template Questionnaire.
- C.2.5 Please also make sure your group completes **Section 4** of the Carbon Footprint Template Questionnaire.

REQUIREMENTS FOR ESTIMATING YOUR GROUP'S CARBON FOOTPRINT

- C.2.6 The group can undertake its own carbon footprinting, and a detailed five-step approach, recommended by De Beers Group and the Carbon Trust, is provided in **Section 3.2 of the Carbon and Climate Reporting Guidance and Frequently Asked Questions** document (a summary of the five-step approach is also provided below). This approach is aligned to the GHG Protocol Methodology and can be found in the Resource Pack section of the SMART System.
- C.2.7 Where the group is undertaking its own carbon footprinting, the following 5-step approach is recommended:
1. Define an organisational boundary and a reporting boundary
 2. Identify emissions sources
 3. Collect activity data
 4. Quantify the carbon footprint
 5. Ensure quality control

REQUIREMENTS FOR THOSE WHO DO NOT YET MEASURE THEIR GROUP'S CARBON FOOTPRINT

- C.2.8 Where the group is not currently calculating and reporting its carbon footprint, the group should consider reporting typical activity data that can be employed in the estimation of an approximate carbon footprint, and is accounted for in the Carbon Footprint Template Questionnaire. However, groups must still respond to all carbon and climate-related questions in Section C of the BPP Workbook and the Carbon Footprint Template Questionnaire.
- C.2.9 If the group is reporting activity data in the Carbon Footprint Template Questionnaire, only consumption from those sources that are owned or controlled by the group should be reported. As non-exhaustive examples;
- If the contractor operates on-site and uses energy (eg. diesel, natural gas, electricity) at a facility that your group owns and manages, then those carbon emissions would fall under the group's Scope 1 and 2 emissions. In other words, if they use electricity that your group pays for, then the emissions would be part of the group's Scope 2 emissions.
 - If the contractor operates off-site, using their own energy (eg diesel, natural gas, electricity), then those emissions would form part of your group's Scope 3 emissions. In other words, your group does not pay for the electricity used by the contractor to provide their service, then those emissions would fall under your group's Scope 3 emissions.

DATA QUALITY REQUIREMENTS

- C.2.10 Whether reporting activity data or calculating a carbon footprint, data quality should be a key consideration, preferring better quality data to the extent possible. Below is an example of a data quality framework with dimensions for the data's completeness and the data's interpreted reliability; this framework is purely for illustrative purposes.

SCORE	COMPLETENESS	RELIABILITY
VERY GOOD	Data from all relevant sites over an adequate time period to even out normal fluctuations	Verified data based on measurements Limited to now manual data manipulation required to progress from data origin source to final reporting
GOOD	Data from more than 50 percent of sites for an adequate time period to even out normal fluctuations	Verified data partly based on assumptions or non-verified data based on measurements
FAIR	Data from less than 50 percent of sites for an adequate time period to even out normal fluctuations or more than 50 percent of sites but for a shorter time period	Non-verified data partly based on assumptions, or a qualified estimate (e.g. by a sector expert) Substantial manual data manipulation required to progress from data origin source to final reporting
POOR	Data from less than 50 percent of sites for shorter time period or representativeness is unknown	Non-qualified estimate

In reporting constituent activity data, it is possible that there is a difference between typical data units of measure used by the group, and the units of measure requested in the Carbon Footprint Template Questionnaire. The group should ensure that data is completed accurately and in the requested units of measure. Please refer to **Section 3.3. of the Carbon and Climate Reporting Guidance and Frequently Asked Questions** document for tables with suggested unit conversion factors. For example, to convert energy from GJ to kWh, use the energy conversion table. To convert gallons to Litres, use the Volume conversion Table.

In reporting constituent activity data, if the group employs fossil fuels other than those suggested on the respective reporting table of the Carbon Footprint Template Questionnaire, they must disclose these under the “other” rows provided in the tables to allow for reporting the respective fossil fuels consumed, their properties and the group quantities in the respective financial year.

Other reporting requirements

- C.2.11 Where the group is calculating, monitoring and reporting its carbon footprint on an annual basis, you must describe how and where you are calculating and reporting your carbon footprint. The group is encouraged to report its carbon footprint in annual reports (e.g. Sustainability Reports or Integrated Annual Reports).
- C.2.12 While the group is welcome to calculate its own carbon footprint, it is recommended best practice to employ a professional consultant to ensure accurate calculation and reporting. If the group does not currently contract consultants to undertake its carbon footprinting, it is not the intention to start doing so to comply with Section C. Rather, it is to provide guidance and equip the group with the necessary information to be able to measure and report its carbon footprint in accordance with the GHG Protocol.
- C.2.13 Where the group does not yet calculate, monitor and report its carbon footprint, they must describe a forward looking plan on how they intend to do this in the future.
- C.2.14 Where the group’s carbon footprint is verified, it should explain the details and provide proof of verification. While it is not mandatory to independently verify a group’s carbon footprint, it is considered best practice and recommended by De Beers Group and the Carbon Trust. Please note that having a consultant supporting in calculating the group’s carbon footprint does not qualify as third-party verification. There are three general types of verification:
- **Internal verification or quality control by the group’s own employees.** This internal verification ensures the footprint methodology has been followed correctly and that data entry and footprint calculations have also been done correctly.
 - **External verification by a third-party against recognised best practice.** Third-party verification should be undertaken according to a robust methodology or standard, such as the GHG Protocol or ISO14064 Standard. Simply put, the third-party ensure that your footprint has been calculated according to best practice methodology of either the GHG Protocol or the ISO 14064 Standard.

- **Third-party Assurance against specified standards.** In the case that assurance is the type of verification employed:
 - Assurance of non-financial information should be carried out according to the 'ISAE 3000 (Revised): Assurance Engagements other than Audits or Reviews of Historical Financial Information' standard.
 - Assurance of GHG statements should be supplemented by the application of the 'ISAE 3410' Assurance Engagements on GHG Statements.

If the standards above are not used the onus is on the group to demonstrate the assurance standard applied is equivalent and as robust.

C.3 CARBON AND CLIMATE TARGETS

- C.3.1 The group should articulate any specific carbon reduction targets they have made or intend to make either at group or entity/facility level. Carbon and climate targets set an imperative to which the group signals it wishes to be held accountable. The key components of a group's carbon and climate targets should include the following:
- The explicit baseline and target that the group strives to achieve (eg a percentage reduction in its carbon footprint from a chosen year).
 - A timeline for achievement of these targets (eg by 2030).
 - Buy-in and endorsement of the carbon and climate targets from senior management.
 - A credible strategy or plan of action that will enable the group to achieve the carbon and climate targets.
 - A monitoring and reporting system to track performance against the carbon and climate commitments made by the group.
- C.3.2 Where a group has set or is intending to set carbon and climate targets, it is not immediately required to have a detailed plan of action or monitoring and review system in place (although these should be developed as a priority to align with best practices). The group should be able to demonstrate taking proactive steps towards identifying the improvement mechanisms, and planning and affecting implementation once targets have been set.
- C.3.3 The group should consider whether its carbon and climate targets are quantitative or qualitative.
- For example, this can be a target to be carbon neutral by a certain date; or to achieve a 30% reduction in a group's Scope 1 emissions by 2025; or sourcing 50% of energy/electricity from renewable energy sources by 2030. Carbon and climate commitments can also be qualitative.
 - For example, implementation of a carbon and climate awareness training programme for all personnel; or certification to ISO 14001 Standard for entity or entities within the group. The key consideration is for the commitment to be specific, understandable, and measurable.
- C.3.4 The group's carbon and climate targets should be related to the group's carbon footprint from its operations and businesses within it. They should ideally represent "stretch goals" while being achievable, and relate to opportunities to make a meaningful impact, whether addressing harm or making a positive contribution. The nature of the carbon and climate target is dependent on the group's core values and strategy. Examples include but are not limited to:
- Carbon and climate targets relating to reducing carbon emissions across Scope 1, 2 and 3 emissions,
 - Using more renewable energy across operations, or investing in technologies that will support climate action beyond the group's value chain (for example, investing in nature-based solutions, green hydrogen technology, carbon capture technology), the adoption of management frameworks, methodologies or tools, that are intended to drive positive performance and impact through management implementation (for example, becoming a signatory to the UN Global Compact, becoming a signatory to the We Mean Business Coalition, adopting the recommendations of the Task Force on Climate-Related Financial Disclosures (FSB TCFD), or committing to the Science-based Targets initiative to set a science-based carbon reduction target.
- C.3.5 Where the group undertakes verification of carbon and climate targets, this should be against a recognised external Standard, for example:
- Validation by the SBTi for science-based carbon emissions reduction targets and/or Net Zero targets validated against the SBTi Net Zero Standard
 - In the case of Carbon Neutral targets (if relevant): verification against the PAS 2060, Australian National Carbon Offset Standard for Organisations, or another credible alternative.

- C.3.6 Carbon and climate targets should be supported by measures to meet (or exceed) these targets. Strategies or action plans can include a suite of technological, behavioural and structural measures to meet carbon and climate commitments. The measures employed to reduce the group's carbon and climate impacts will be unique to that group's settings but may typically include interventions related to: energy efficiency, renewable energy, carbon offsets, climate change policy development, education and awareness campaigns, process innovation, disruptive technology adoption, and circularity measures (waste minimisation can help reduce carbon emissions, for example).
- C.3.7 Where strategies, action plans or measures include carbon offsetting, please elaborate on the measures planned or adopted, and describe internal or external guidance and standards applied (for example, Oxford Principles for Net Zero Aligned Offsetting or PAS2060 Offsetting Residual GHG Emissions).

Please note that the above examples are for illustrative purposes only and should not be read as commitments and management approaches that businesses must adopt.

C.4 MEASURING PROGRESS AGAINST CARBON AND CLIMATE TARGETS

Please refer to the **Carbon and Climate Reporting Guidance and Frequently Asked Questions** document for additional guidance.

- C.4.1 Where the group is making carbon and climate targets to reduce carbon emissions, the group should devise a carbon and climate performance monitoring and reporting system. The system should be effective in tracking the group's performance in respect to its carbon and climate commitments.
- C.4.2 The means by which progress is measured and communicated by the group over time, may be entity-specific and driven by the objectives the group has defined. Typically, progress and performance are reported with the use of indicators that translate data into decision-useful information. Indicators may communicate:
- absolute performance (for example, 25 tCO₂e of carbon emissions avoided), intensity performance (for example, the carbon intensity per carat – 0.5tCO₂e/carat)
 - relative performance (for example, 33% carbon emissions reduction against prior year performance) or
 - progress against a target (for example, 30% of the carbon emissions reduction target achieved in 25% of the target period).
- C.4.3 An effective carbon and climate performance monitoring and reporting system should have the following elements:
- A suitable baseline for each measure being disclosed and reported against. A baseline reflects the starting point against which future performance, targets and objectives will be measured. An emissions baseline should be derived from a representative data set and ideally not, for example, during a period of major disruptions to operations (for example, using a 2020 baseline for carbon emissions is not representative of business-as-usual due to business disruptions from Covid-19). If your group has not yet set a carbon emissions baseline, it is recommended that you use the most recent (and representative) year that you have data for (for example, no earlier than 2019 but not 2020 due to Covid-19).
 - A robust system in place to record carbon and climate data, such as electricity consumption, fossil fuel consumption, and refrigerant gas purchases throughout the period. This may involve appointing internal champions or designated roles to personnel for the collection and reporting of this data. Alternatively, third-party contractors and service providers can help to provide data to the group (such as landlords collecting energy use information for billing), and converting expenditure into carbon emissions (such as spend on company vehicle fuel purchases to litres of fossil-fuels used and carbon emissions produced).
 - Rigorous data validation and verification procedures to ensure that the carbon and climate data collected are accurate, reflective, complete, and usable for the group's carbon and climate reporting. This may involve having quality checks in place, requiring substantiation, and supporting documentation with data collection and entry into the group's records. It is recommended, but not currently mandatory, that your group obtains third-party verification on the carbon and climate data recorded and on your performance against a carbon and climate commitment. Proof of third-party verification should be submitted together with your group's response to the Carbon Footprint Template Questionnaire.
 - Regular and consistent carbon and climate impact reporting that clearly shows the progress made between periods and demonstrates alignment between the group's carbon and climate performance and the carbon and climate commitments made.

D MINING

D.1 EXTRACTIVE INDUSTRIES TRANSPARENCY INITIATIVE:

- D.1.1 Mining facilities must demonstrate commitment and support to the implementation of the Extractive Industries Transparency Initiative (EITI). This includes establishing a publicly available policy or management system and a senior manager responsible for implementation, disclosure and validation with EITI.
- D.1.2 In countries where EITI is not implemented mining facilities must implement systems to promote transparency, including public disclosure of taxes, payments and owners, and the use of rigorous procurement processes.

D.2 IMPACT ASSESSMENT

- D.2.1 An environmental and social impact assessment must be undertaken 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. It must take into account and include:
- An overarching policy defining the environmental and social objectives and principles that guide the project
 - A process for identifying environmental and social risks and impacts
 - Methodologies for recording baseline conditions, cumulative and indirect impacts relating to environmental, social and human rights and the findings of environmental and social studies relevant to the conclusions of the impact assessment.
 - Implementation of environmental and social management plans and options available to avoid, minimise and mitigate negative impacts, which include defined roles and responsibilities, processes for stakeholder engagement, monitoring and review, and for addressing grievances
 - Design options that avoid and minimise negative impacts where applicable
 - Stakeholder participation should include collection of data, development of options to mitigate potential impacts and implementation of the environmental and social monitoring programme where relevant.
- D.2.2 The group/entity/facility will prepare and update plans for managing environment, social and human rights risk, including potential emergencies and ensure that the burden of negative consequences will not fall on vulnerable racial, ethnic, socio-economic or other vulnerable groups.
- D.2.3 Impact assessments should be disseminated in an easily accessible format and made publicly available. This should give consideration to local languages, cultures and practices to ensure all relevant stakeholders' needs are considered.
- D.2.4 Processes must be in place to monitor the implementation of management plans throughout the mine life cycle to ensure impacts are being appropriately managed. This must include on-going stakeholder dialogue.
- D.2.5 The group/entity/facility must make environmental and social performance part of bidding packages for new construction contracts.

D.3 COMMUNITY ENGAGEMENT AND DEVELOPMENT

- D.3.1 The group/entity with mining facilities will have appropriate policies, skills, resources, suitably experienced personnel and systems to manage early and on-going engagement with affected communities and in particular:
- Identification and meaningful representation of affected communities and all relevant stakeholders in relation to project risks, impacts and phase of development, including significant changes to existing facilities.
 - Undertake early and ongoing engagement with affected communities and stakeholders throughout the project's lifecycle, including post-closure monitoring.
 - Establish effective communication measures to disseminate relevant project information and receive feedback in an inclusive, culturally-appropriate and rights-compatible manner.

- Ensure the interests and development priorities of affected communities are considered in major mining decisions in the project's lifecycle through informed consultation and seek broad community support for proposals in major mining decisions in the project's life cycle, to ensure activities that contribute to lasting social and economic wellbeing are supported.
 - At all times, carry out engagement in an inclusive, equitable, culturally appropriate and rights-compatible manner.
- D.3.2 The group/entity/facility shall establish strategic social objectives which are:
- Aligned with the project's lifecycle strategy from exploration through to closure, considering long term social impacts and risks.
 - Aligned with stakeholder expectations, sought from on-going stakeholder feedback.
 - Developed in consideration of short and long-term socio-economic development objectives and aspirations of stakeholders, including community members and local, regional and national governments.
- D.3.3 The group/entity/facility will ensure that the strategic social objectives include:
- Clearly defined priorities that manage impacts, risks and seek to enhance development opportunities.
 - The appropriate skills and capabilities to deliver on the objectives and plans.
 - Clearly defined accountabilities, timescales and budget.
 - Monitoring and measurement indicators to track progress.
- D.3.4 The group/entity/facility shall establish a stakeholder engagement plan that:
- Identifies all relevant stakeholders, including those that may be vulnerable, marginalised or disadvantaged.
 - Is respectful of all relevant community conventions, equitable, inclusive and rights-compatible.
 - Ensures communication of planned projects, proposals, changes, and other information is disseminated in a timely and clear manner to ensure all interested stakeholders understand the potential and actual impacts of these planned projects.
 - Ensures that the views of relevant stakeholders are sought and incorporated into the decision-making process as appropriate.
- D.3.5 The group/entity/facility shall undertake socio-economic impact assessments at timely intervals to gauge stakeholder sentiments and aspirations, identify risks and impacts and opportunities for socio-economic development.
- D.3.6 The group/entity/facility will seek to avoid involuntary resettlement.
- D.3.7 Where involuntary resettlement is unavoidable, it shall be minimised and the group/entity/facility
- Shall ensure that the requirements of the International Finance Corporation's Performance Standard 5 on Land Acquisition and Involuntary Resettlement and supporting Guidance Note requirements are met. This includes consideration of vulnerable and disadvantaged groups
 - Shall establish a resettlement policy and procedures
 - Shall prepare a Resettlement Action Plan (RAP)
 - Where economic displacement occurs, a Livelihood Restoration Plan (LRP) shall be prepared
 - Shall ensure that suitably qualified and experience persons are employed to support the resettlement.
- D.3.8 Socio-economic impacts assessments shall include an assessment of human rights, vulnerable and marginalized groups and conflict. These assessments can be done in conjunction with environmental impact assessments as required.
- D.3.9 The group/entity/facility shall ensure that are there systems to identify, assess, manage and report on social risks and impacts, by the business and its contractors, on an on-going basis.
- D.3.10 Where the group/entity/facility enters into formal benefit sharing agreements, these shall be negotiated and agreed in an inclusive, equitable, culturally-appropriate and rights-compatible manner.
- D.3.11 The group/entity/facility shall implement measures and processes to identify, document, monitor and report on the implementation of any social commitments, both formal (such as impact benefit agreements) and informal (ad hoc commitments made by the group/entity/facility personnel to external stakeholders).

- D.3.12 The group/entity/facility shall implement a site-based social incident, complaints and grievance management system and procedure that is legitimate, accessible, predictable, equitable and transparent. The procedure should:
- Be transparent and structured, allowing stakeholders to submit their grievances free of charge, without fear of reprisal and if necessary, anonymously via third parties.
 - Include a system for reporting, classifying, investigating, processing and managing a complaint or incident, including relevant notification protocols for internal escalation and awareness.
 - Be established with clear accountabilities and responsibilities, including a senior manager with sufficient knowledge to provide assurance the issue has been addressed.
 - Communicate outcomes and resolutions back to the relevant stakeholders.
 - Ensure an effective mechanism is established to enable stakeholders to appeal findings where they are not satisfied with the outcome of the investigation and/or proposed resolution.
 - Establish monitoring and evaluation measures to monitor these mechanisms and processes and assess their effectiveness.
- D.3.13 The group/entity/facility will seek to support the development of the communities in which they operate and across the project life cycle through:
- Consulting with local communities and key stakeholders, to identify, assess and support initiatives to enhance their economic development.
 - Supporting the design of programmes for training and capacity building to contribute to the employment of local community members.
 - Offering local supplier development programmes, both through capacity building and access to finance and business.
 - Enable procurement and employment opportunities for local enterprises and community members.
 - Where possible and feasible, design and/or leverage projects so that asset infrastructure (e.g. water, power, roads) provides development benefits in host communities and improves access to social infrastructure.
 - Broader social investment initiatives with long term strategic goals that help address risks to the community and maximise opportunities within the community.

D.4 HEALTH AND SAFETY

- D.4.1 The operating company shall carry out a scoping exercise to identify significant potential risks and impacts to community health and safety from mining-related activities. At minimum, the following sources of potential risks and impacts to community health and/or safety shall be considered:
- a. General mining operations;
 - b. Operation of mine-related equipment or vehicles on public roads;
 - c. Operational accidents;
 - d. Failure of structural elements such as tailings dams, impoundments, waste rock dumps;
 - e. Mining-related impacts on priority ecosystem services;
 - f. Mining-related effects on community demographics, including in-migration of mine workers and others;
 - g. Mining-related impacts on availability of services;
 - h. Hazardous materials and substances that may be released as a result of mining-related activities; and
 - i. Increased prevalence of water-borne, water-based, water-related, and vector-borne diseases, and communicable and sexually transmitted diseases (eg, HIV/AIDs, tuberculosis, malaria, Ebola virus disease or others) that could occur as a result of the mining project.
- D.4.2 Scoping shall include an examination of risks and impacts that may occur throughout the mine life cycle (eg, construction, operation, reclamation, mine closure and post-closure).
- D.4.3 Scoping shall include consideration of the differential impacts of mining activities on vulnerable groups or susceptible members of affected communities.
- D.4.4 Mining facilities will develop and maintain emergency response plans, in collaboration with potentially affected communities, workers and their representatives, and relevant agencies, pursuant to guidance provided by United Nations Environment Programme (UNEP) on Awareness and Preparedness for Emergencies at the Local Level (APELL) for Mining. Such emergency response plans must include consideration of emergencies arising within the facility that have potential to impact off-site areas.

- D.4.5 Establish an emergency response co-ordinating group which should include management team representatives and key stakeholder representatives such as local authorities and emergency response organisations, community leaders and worker representatives, to manage interaction between those involved in preventing or responding to emergencies and ensure a coordinated and inclusive approach to emergency response planning.
- D.4.6 Periodically test the emergency preparedness and response plans.
- D.4.7 The operating company shall make information on community health and safety risks and impacts and monitoring results publicly available.
- D.4.8 The operating company shall allow workers access to their personal information regarding accidents, dangerous occurrences, inspections, investigations, remedial actions, health surveillance and medical examinations.
- D.4.9 Where a worker dies as a result of a work-related injury or disease, the operating company shall, at minimum, provide to spouses and dependent children benefits to cover funeral expenses and transportation of the worker's body, if appropriate, as well as compensation that is equal to or greater than three months' salary of the deceased worker.

D.5 BIODIVERSITY

- D.5.1 The group/entity/facility with mining facilities will not explore or mine in World Heritage Sites and ensure that their activities do not impact directly on adjacent World Heritage Sites.
- D.5.2 The group/entity/facility will have a process to identify legally designated protected areas, comply with all requirements relating to these and ensure that all decisions concerning exploration, development, operation and closure take account of the impact on these areas.
- D.5.3 The group/entity/facility should use appropriately competent personnel to map protected areas in and around the project site as early as possible in the mining lifecycle and repeat periodically.
- D.5.4 The group/entity/facility will not undertake any activity that will, or is likely to, lead to significant decline or the extinction of a species listed by the International Union for Conservation of Nature (IUCN) as threatened with extinction, or create adverse impacts on habitat critical to supporting their survival.
- D.5.5 The group/entity/facility with mining facilities will assess potential environmental impacts on land, water, air and biodiversity when planning any developments or expansions, exploration programmes and mining projects and implement action plans to deliver measurable diversity benefits proportionately to the level of any impacts and which will include:
 - Biodiversity, ecosystem services and protected areas screening, assessment, management planning, implementation of mitigation measures, and monitoring shall be carried out and documented by competent professionals using appropriate methodologies and shall include consultations with stakeholders, including, where relevant, affected communities and external experts.
 - Biodiversity, ecosystem services and protected areas impact assessments, management plans and monitoring data shall be publicly available, or made available to stakeholders upon request.
 - Development and implementation of a program to monitor the implementation of its protected areas and/or biodiversity and ecosystem services management plan(s) throughout the mine life cycle and have its findings subject to independent review
- D.5.6 The group/entity/facility shall identify Key Biodiversity Areas affected by their operations and:
 - Use the mitigation hierarchy to avoid, minimise, rehabilitate or, where required after these steps have been implemented, offset impacts on biodiversity and ecosystem services.
 - Implement action plans to deliver measurable biodiversity benefits that are at least commensurate with the level of adverse impacts, and ideally provide net positive impact.
 - In areas of Critical Habitat, ensure that there are no measurable adverse impacts on the criteria for which the habitat was designated or on the ecological processes supporting those criteria and provide overall net gain in biodiversity benefits for the area.
- D.5.7 The group/entity/facility carrying out exploration or mining activities in deep-sea areas shall ensure there is sufficient scientific knowledge of potential impacts of these activities, and implement controls to mitigate adverse impacts.

D.6 NATURAL RESOURCE & ENVIRONMENT RISK MANAGEMENT

- D.6.1 The group/entity/facility with mining operations will implement a comprehensive system for managing tailings and waste rock, including:
- A commitment towards meeting the requirements of the Global Industry Standards for Tailings Management.
 - A governance system to oversee the identification and management of Tailings, Tailings Storage Facilities and waste risks, including the identification and appointment of adequately experienced roles, clarity on roles, responsibilities and organisational structures, adequate ongoing training for relevant personnel and a process for internal and external review and assurance throughout the entity's life cycle.
 - Allocating the necessary operational resources, including capital, human, financial, in the relevant business planning processes to implement and maintain the activities of the governance framework.
 - A risk-based approach, including regular, rigorous risk assessment and transparent decision-making to choose the most appropriate site-specific approach to disposal, using the best available technology. Where risk assessment finds that conditions are inappropriate for marine or lake disposal of tailings and waste rock or where there is insufficient data then this approach must not be utilized.
 - Critical controls to identify, implement, communicate, and monitor actions for managing high risks, including assessing risks when internal or external factors change.
 - Performance criteria established for the critical controls and their associated monitoring, reporting and verification activities.
 - An engineer-of-record to provide technical direction for waste management and tailings management.
 - Independent review and evaluation of the controls to manage tailings and waste by a competent, objective third party. This review should cover all aspects of the planning, design, construction, operation and maintenance of waste facilities and the outcomes and actions raised should be recorded, reviewed, addressed and communicated to executive management.
 - Adopt 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
 - Design, construct, maintain and monitor tailing facilities and waste rock facilities to ensure structural stability, control discharge, and protect the surrounding environment and local communities and prevent catastrophic failures.
 - Not use riverine tailings disposal.
 - Not use marine or lake tailings or waste rock disposal for land-based mining facilities, unless:
 - A thorough environmental and social analysis of alternatives, using scientifically valid data, was conducted that showed that marine or lake tailings disposal creates fewer environmental and social impacts and risks than a land-based tailing facility.
 - Scientific studies were conducted demonstrating that there are no significant adverse effects on coastal resources.
 - There is long-term impact monitoring, including for cumulative impacts, and a provision made for a mitigation plan.
- D.6.2 Carry out physical and geochemical characterisations and in-depth risk assessment of mining wastes so as to identify and manage potential impacts arising from acid rock drainage and metal leaching.
- D.6.3 Protect the surrounding environment and local communities from potential impacts of acidification, metal leaching, loss of containment or contamination during the mine's operation and post-closure.
- D.6.4 For new mines or when significant changes are made to existing mines carry out screening to determine whether there are significant impacts on offsite human noise receptors.
- D.6.5 For all mining facilities implement appropriate measures to establish baseline noise level and mitigating actions necessary to ensure noise does not exceed prescribed legal levels. Processes used must include engagement of relevant affected stakeholders in the mitigation strategies.
- D.6.6 Mining facilities must establish strong and transparent governance mechanisms towards the use, disposal and management of natural resources (water, soil, and air) in its activities, including the establishment of clear accountabilities at site and board level and regular reporting of approach to natural resource stewardship, performance objectives (targets) against plans and risk mitigation strategies, and the identification and management of relevant risks.
- D.6.7 Mining facilities must undertake measures to identify and record impacts on water, air quality and soil from mining facility operations on resource availability and quality and on surrounding communities.
- D.6.8 All mining facilities must reduce significant impacts, including Greenhouse Gas emissions, water use and

land usage and increase resource efficiency on an annual basis. These measures shall include the following management system elements in relation to greenhouse gas emissions and energy use, waste water discharges and water use and air quality as a minimum:

- Publicly available policy.
- Assessment and management of emissions and resource use.
- Implementation of management and improvement plans and mitigation measures for significant emissions and resource use.
- Engagement with relevant stakeholders, including governments, local authorities and affected communities.
- Reporting progress publicly towards targets for improvement, material risks and opportunities, and at a minimum, report on the relevant GRI indicators for these material topics.

D.6.9 The group/entity/facility should have a public net zero commitment to be achieved by 2050 or sooner; targets covering scope 1, 2 and 3 emissions as well as public reporting of progresses on scopes 1, 2 and 3 that aligns with the Task Force on Climate-related Financial Disclosures (TCFD) and has been externally verified.

D.6.10 The group/entity/facility should monitor energy, water, and other identified significant natural resources used and establish associated efficiency initiatives, including working towards use of renewable energy in alignment with national targets or legislation, or water stewardship initiatives that promote responsible and sustainable water use and contribute to improved water security and sanitation.

D.6.11 Where the group/entity/facility is part of the mining sector policies, procedures and clear allocation of responsibilities in relation to water governance is required. Water use at facilities must be managed effectively using a water balance and taking cumulative impacts into account. Water performance must be publicly communicated and stakeholder collaboration utilised to achieve responsible and sustainable water use at a water catchment level.

D.7 MERCURY

D.7.1 Where mercury is contained in saleable products, by-products or emissions, the group/entity/ facility shall adopt management practices that are at minimum in accordance with legal requirements and in alignment with the Minamata Convention to control and, where feasible, reduce mercury emissions using best available techniques or best environmental practices that take into account technical and economic considerations.

D.7.2 For groups/entities/facilities that use mercury in their mining and processing activities, the group/entity/facility shall eliminate whole ore-amalgamation, open burning of amalgam or processed amalgam, and burning of amalgam in residential areas, and cyanide leaching in sediment, ore or tailings to which mercury has been added without first removing the mercury.

D.7.3 Where mercury is being used in ASM activities, controls should be in place to prevent exposure to anyone under the age of 18 year and pregnant women and women of child-bearing age, and the group/entity/facility sourcing from ASM producers shall implement time bound action plans to control, reduce, and where feasible eliminate, the use of mercury and mercury compounds from such mining and processing activities.

D.7.4 Where mercury emissions are occurring implementation of the mercury management plan, including data, must be report publicly, at least annually.

D.8 INDIGENOUS PEOPLES

D.8.1 Mining facilities will respect the rights of Indigenous Peoples as articulated and defined in applicable provincial, national and international laws and their social, cultural, environmental and economic interests, including their connection with lands and waters.

D.8.2 Mining facilities will seek to obtain broad-based support of affected Indigenous Peoples and to have this support formally documented, including partnerships and/or programmes to provide benefits, compensation and mitigate impacts.

D.8.3 New mining facilities, or changes to existing mining facilities, shall, as described in International Finance Corporation (IFC) Performance Standard 7, work to obtain the Free, Prior and Informed Consent (FPIC) of affected Indigenous Peoples during the planning and approval stages, through a process that strives to be consistent their traditional decision-making processes, while respecting internationally recognised human rights and based on good faith negotiations.

- D.8.4 The mining facility shall implement policies or procedures to ensure respect for the rights of Indigenous Peoples, conduct an impact assessment on the potential impact of the business on Indigenous Peoples and establish programmes to mitigate negative impacts and provide benefits to Indigenous Peoples.
- D.8.5 The mining facility shall document the mutually accepted process between the mining facility and the affected Indigenous Peoples, and any relevant government authorities, and shall evidence the agreement between the parties as the outcome of the negotiations..
- D.8.6 Obtaining Free Prior and Informed Consent (FPIC) could be associated with any of the following circumstances:
- New mining facilities, or for changes to existing facilities, that are likely to have significant adverse impacts on indigenous peoples including, but not limited to, those associated with:
 - Impacts on lands and natural resources subject to traditional ownership or under customary use.
 - Relocation of indigenous peoples from lands and natural resources subject to traditional ownership or under customary use.
 - Significant impacts on critical cultural heritage that is essential to indigenous peoples' identity and/ or their cultures, ceremonies or spiritualities.
 - Use of cultural heritage (including indigenous peoples' knowledge, innovations or practices) for commercial purposes.
- D.8.7 The group/entity/facility shall apply the principles of FPIC to groups that exhibit the commonly accepted characteristics of Indigenous Peoples, including:
- Self-identification as members of a distinct indigenous cultural group and recognition of this identity by others.
 - Collective attachment to geographically distinct habitate or ancestral territories in the project area and to the natural resources in these habitats and territories.
 - Customary cultural, economic, social or political institutions that are separate from those of the dominant society or culture.
 - A distinct language or dialect, often different from the official language/s of the country or region in which they reside.
- D.8.8 Impact Benefit Agreements are considered a suitable FPIC process where they are carried out in good- faith and with the informed consultation and participation of Indigenous People.
- D.8.9 In collaboration with the community, the group/entity/facility shall periodically monitor the effectiveness of any mechanisms or agreements developed to deliver community benefits, based on agreed upon indicators, and evaluate if changes need to be made to those mechanisms or agreements.

D.9 ARTISANAL AND SMALL-SCALE MINING

- D.9.1 Mining facilities will, as appropriate, participate in initiatives, including multi-stakeholder initiatives, which enable the professionalisation and formalisation of artisanal and small-scale mining (ASM), where it occurs within their areas of operation.
- D.9.2 Where artisanal and small-scale mining operates on or around a mining facility, the group/entity/facility will engage directly with them and maintain continuous dialogue as part of their Social and Environmental Impact Assessment and community engagement processes, incorporating ASM into ongoing risk management activities.¹
- D.9.3 Establish an ASM policy and management plan to ensure ASM considerations are included in all aspects throughout the mine life cycle.

D.10 SECURITY GUARDS

- D.10.1 The group/entity/facility with mining facilities will ensure that security risk assessments are conducted and that security personnel receive training to ensure security approaches are consistent with the Voluntary Principles on Security and Human Rights and promote protection of human rights.
- D.10.2 The human rights of any Artisanal and Small-scale Mining (ASM) producers should be explicitly addressed in the training of private security personnel and any other relevant staff.
- D.10.3 Artisanal and Small-scale Mining (ASM) producers should be explicitly addressed in training of private security personnel. In some countries, the term Indigenous may be controversial, and local terms may be used which are broadly equivalent, such as tribal peoples, aboriginal people, first peoples, native people. In other situations, Indigenous Peoples may not be recognised by the State.
- D.10.4 The group/entity/facility whose business is provision of private security services to the jewellery supply chain shall be certified members of the International Code of Conduct Association (ICoCA).

D.11 MINE CLOSURE PLANNING

- D.11.1 The group/entity/facility with mining facilities will prepare and regularly review a mine closure plan in relation to each mining facility and ensure that adequate capacity and resources, including financial provisions, are available to meet closure and rehabilitation requirements. Closure funding estimates shall be reviewed periodically during the mining lifecycle.
- D.11.2 There must be regular engagement with local stakeholders in relation to each mining facility including Indigenous peoples, communities, ASM, employees and regulators, regarding mine closure and rehabilitation plans.
- D.11.3 Land disturbed or occupied by mining facilities shall be rehabilitated with the objective of establishing an appropriate self-sustaining ecosystem or other post-mining land use developed through engagement with key stakeholders in the mine closure planning process.
- D.11.4 Closed mine facilities must be monitored for geotechnical stability and routine maintenance as required by applicable law.

D.12 SUSTAINABILITY REPORTING

- D.12.1 The group/entity/facility with mining facilities will report publicly on their sustainability performance using the Global Reporting Initiative (GRI) Sustainability Reporting Standards on an annual basis.
- D.12.2 The reports must have external assurance as defined by the GRI.

D.13 DIVERSITY AND INCLUSION

- D.13.1 There should be an engagement plan and/or mechanism that seeks to establish a diverse and inclusive culture that addresses material issues identified in the human rights due diligence and/or risk assessment and/or opportunities identified in the group/company/entity's context (for example a gender inclusion strategy or a broader diversity and inclusion strategy).

E CORPORATE SOCIAL INVESTMENT AND BUSINESS IMPACT

E.1 GENERAL

- E.1.1 This section does not impact a group's compliance status against the requirements of the Best Practice Principles Assurance Programme, but it must be completed. "Other environmental commitments" are defined as those in addition to any carbon and climate related commitments, such as water, waste, biodiversity etc.
- E.1.2 This section of the BPP Workbook should be completed from the perspective of the group as a whole. However, you may refer to specific entities as relevant within this group-wide perspective.

E.2 OTHER ENVIRONMENTAL COMMITMENTS GUIDANCE

Please note that it is possible that there may be some aspects of repetition between this section, E.3 and others of the BPP. Please complete each BPP section uniquely to the fullest extent possible when completing the BPP Self-Assessment Workbook. Please provide details where you are able to, and if you do not have the information, please just mark as not available.

- E.2.1 The group should provide specific details about specific commitments that an individual group/entity/facility is making within a specific jurisdiction, or within a specific sector of the value chain (e.g., all the factories in the group, or all the retail stores in the group).
- E.2.2 Environmental commitments refer to any targets, objectives or goals relating to environmental performance, performance management and/or stewardship that a group has made and sets an imperative to which the group signals it wishes to be held accountable.

A group may start their environmental improvement journey by setting the targets and objectives and a timeline to achieve them, without having a detailed plan of action or monitoring and review system in place (although these should be developed overtime to align with best practices). This sets the precedent that the group is striving to improve, and the mechanisms of improvement can follow-on in due course. It is however imperative that the group begins to take proactive steps towards identifying the improvement mechanisms, and planning and affecting implementation.

Environmental commitments can be quantitative, for example, a commitment to reduce waste by 30% by 2030, or to improve recycling by 50% by 2030. such as implementation of an environmental awareness training programme for all personnel. The key consideration is for the commitment to be specific, understandable, and measurable.

A group's environmental commitments could be related to environmental impact concerning water consumption and quality, waste, conservation and biodiversity, or any other aspect of environmental impact specific to the group and its operations and businesses within it.

An environmental commitment may relate to reducing harmful or potentially harmful impacts (for example reducing local air pollution from operations or achieving zero waste to landfill) or contributing to positive outcomes from a neutral or negative position (for example increasing water reuse/recycling rates or rehabilitating degraded land).

An environmental commitment may also relate to the adoption of methodologies or tools, which themselves are intended to drive positive environmental performance and impact through management implementation (for example adopting the recommendations of the Task Force on Nature-Related Financial Disclosures (FSB TNFD).

¹ When engaging with artisanal and small-scale miners involved in alluvial diamond mining, please refer to the recommendations of the kimberley process moscow declaration (2015) [here](#).

The environmental commitments should ideally represent “stretch goals” while being achievable, and relate to opportunities to make a meaningful impact, whether addressing harm or making a positive contribution. The nature of the environmental commitment is dependent on the group’s core values and strategy.

The group may identify a particular environmental impact as being a priority for reporting and measurement due to the magnitude, sensitivity or alignment of that impact to their operations. For example, entities within the group operating in a water-stressed region may prioritise water conservation due to water scarcity risks in that environment/country. In time, harmonisation between De Beers and group commitments is sought so that collaborative and mutually beneficial efforts can be formulated and implemented to meet these environmental commitments.

- E.2.3 Once a group’s environmental targets and objectives have been established and disclosed, the group should put measures in place to meet (or exceed) these targets. It is for the group to decide on the interventions and measures that are put in place to reach their environmental targets and objectives, and it is anticipated that the action plan will comprise a suite of technological, behavioural and structural measures in meeting the environmental commitments. The measures employed to reduce the group’s environmental impact will be unique to that group’s settings but may typically include resource-use efficiency, environmental policy development, education and awareness campaigns, process innovation, disruptive technology adoption, and circularity measures (waste minimisation).

Please note that all above examples are for illustrative purposes only and should not be read as commitments and management approaches that businesses must adopt.

E.3 MEASURING PROGRESS AGAINST OTHER ENVIRONMENTAL COMMITMENTS

- E.3.1 To measure progress against its other environmental commitments, the group should devise an environmental performance monitoring and reporting system to track how well these measures are performing in respect to these targets or objectives. The means by which progress is measured and communicated by the group over time may be entity specific and driven by the objectives the group has defined. Typically progress and performance is reported with the use of indicators, that translate data into decision-useful information.
- E.3.2 An effective environmental performance monitoring and reporting system may have the following elements:
1. A suitable baseline for each measure being disclosed and reported against. A baseline reflects the starting point against which future performance will be measured and against which the environmental targets and objectives are set. The baseline for environmental impact measures should derive from a representative data set and ideally not, for example, during a period of major disruptions to operations (such as 2020 during Covid-19) where the baseline may not be reflective of normal, representative conditions.
 2. A robust system in place to record environmental data, such as water consumption, waste production, noting different types of waste generation, handling and treatment methods, throughout the reporting period. This may involve appointing champions or designated roles to personnel for the collection and reporting of this environmental data, making arrangements with third-party contractors and service providers to provide environmental data to the group (such as landlords collecting water use information for billing), and converting expenditure into volumetric units that resonate with the environmental targets and objectives.
 3. Rigorous data validation and verification procedures to ensure that the environmental data collected is accurate, reflective, complete, and usable for the group’s environmental reporting. This may involve having quality checks in place, requiring substantiation, and supporting documentation with data collection and entry into the group’s records, and (potentially) obtaining verification on the environmental data recorded and/or performance against an environmental commitment, and reported by the group.
 4. Regular and consistent environmental impact reporting that clearly shows the progress made between periods and demonstrates alignment between the group’s environmental performance and the environmental commitments made. Internal or external independent verification of performance against an environmental commitment may be against an internal or recognised external Standard or Guidance, for example:
 5. Global Reporting Initiative (GRI) Sustainability Reporting Standards
 6. Sustainability Accounting Standards Board (SASB) Industry or Sector Standards. Different types of verification may be employed and verification should be undertaken according to a robust methodology. In the case that assurance is the type of verification employed:

7. Assurance of non-financial information should be according to 'ISAE 3000 (Revised): Assurance Engagements other than Audits or Reviews of Historical Financial Information'
8. If these are not used, it should be explained why the assurance standard applied is equivalent and as robust.

Verification may also be in terms of accepted Standards. For example, in the case of water footprinting, a group can use the ISO 14046 Standard.

Please note that while above examples often relate to water and waste, these are for illustrative purposes only. These examples should not be read as exclusive focus areas for environmental commitment management areas and approaches that businesses should adopt.

E.4 DIVERSITY AND INCLUSION INITIATIVES

E.4.1 The group should consider and reflect in the self-assessment workbook if it makes any commitments relating to inclusion and diversity initiatives.

E.4.2 Inclusion and diversity initiatives are means that groups can take to ensure that individuals or groups of individuals from different backgrounds are welcomed and treated equally. Diversity can refer to the dimensions that differentiate groups and people from one another. For example, this includes to gender, sexual orientation, gender identity and expression, age, race and ethnicity or disability, and providing support as needed where certain groups are under-represented in an organisation, Inclusion can refer to the effort and practices a group takes to ensure that despite these differences, all individuals are supported and accepted.

E.4.3 Inclusion and diversity commitments could include the following examples. Please note that these are just examples, for illustrative purposes only, and should not be read as suggested approaches/strategies that the group should adopt:

1. Policy commitment and processes promoting equal opportunities.
2. Recruitment approach that is inclusive, eg. use of inclusive language in job adverts, encouraging under-represented candidates to apply such as women, people living with disabilities and other under-represented groups.
3. Steps taken to ensure career development opportunities are available to everyone and individuals do not feel excluded from career development programmes.
4. Measures taken to support equal opportunity in access to promotions and leadership opportunities.
5. Employee resource groups that provide support networks and awareness raising for under-represented groups.
6. Monitoring and evaluation of effectiveness of measures and improvements made including employee feedback.
7. Commitment to reporting on key areas of inclusion and diversity, eg gender pay gap reporting.

E.4.4 Psychological safety is increasingly being viewed as important as physical safety and can also be considered as a commitment to promote an inclusive and diverse workforce. This can include commitments which create conducive environments for individuals to express their views, challenge biases and prejudices. Examples can include the below, but please note these are just examples, for illustrative purposes only, and should not be read as suggested approaches/strategies the group should adopt:

- Anti-harassment, bullying and victimisation policies and initiatives including training on what to do when one experiences bullying and harassment and reporting processes for personalised and anonymous concerns.
- Unconscious bias programmes aimed at raising awareness on being conscious about how people interact with those that are different and consciously challenging their judgements and being aware of potential perceptions.
- Mental health support including raising awareness of mental health issues and providing guidance on where to access support.

E.4.5 Non-discriminatory practices should also be considered when promoting inclusion and in embracing diversity initiatives. Commitments to inclusion and diversity can be captured in existing non-discrimination policies and procedures or other policies and procedures which provide human rights protections. For example, and illustrative purposes only, this could relate to equal pay for equal work.

- E.4.6 The group should consider developing a policy or procedure and/or implementing measures which support individuals living with visible or invisible disabilities. Disabilities are physical or mental impairment that have a substantial and long-term negative effect on someone's ability to do daily activities. Visible disabilities can be seen and recognised because of a physical characteristic, examples include wheelchair use due to paralysis or amputation, physical features related to genetic disorders, carrying a white stick due to visual impairments. Invisible disabilities are disabilities that are not visibly recognisable such as anxiety, chronic pain, learning difficulties.
- E.4.7 The measures a group could implement to support individuals living with visible or invisible disabilities could include the following examples. Please note these are just examples, for illustrative purposes only, and should not be read as suggested approaches/strategies the group should adopt:
- Facilities and structures to enable people living with disabilities to safely access offices and other company, communicate, access to toilets, emergency response planning;
 - Enablers to support performance include right equipment and systems for use by people living with disabilities, appropriate software to enable access to training materials, flexible working, etc.;
 - Policy of inclusion of people living with disabilities including, use of language appropriate and respectful of people living with disabilities, deliberate inclusion of people living with disabilities in recruitment processes and advertising;
 - Measurement and monitoring of representation of people living with disabilities and effectiveness of inclusion measures;
 - Workplace care and support e.g. colleagues' networks and easy access to care.
- E.4.8 There are a number of ways that the group can approach its measuring of progress on inclusion and diversity, which can be either qualitative or quantitative. The group should ensure that any measuring approaches are clearly documented and maintained to ensure that the data captured is accurate. The following are examples of measuring approaches which are suggested for illustrative purposes only and should not be read as suggested approaches/strategies the group should adopt:
- Commitment to and reporting against standards such as the Women's Empower Principles,
 - Setting targets and / or tracking indicators related to inclusion and diversity e.g. levels of representation of different under-represented groups, pay equality, appointment and exit rates.
 - Employee engagement surveys that include questions about inclusion and diversity and tracking performance against industry or other benchmarks.
- E.4.9 The living wage can be defined as pay which covers the basic needs of workers and their families to maintain a safe, decent standard of living, including food, water, housing, healthcare, education, transport and clothing, as well as discretionary income to cover unforeseen circumstances.
- Where a group is paying the living wage, this can apply to either all or some entities within the group. Living wage payments should account for the local cost of living and are normally higher than the minimum wage, which is the legal minimum pay required by applicable law. If companies include the living wage in pay, they are encouraged to have it aligned to or certified against a recognised and legitimate living wage standard. Their policies should detail the dimensions and calculations used by the company to determine the living wage and ensure that these elements are based on clear and fair criteria. These policies should be endorsed at the highest levels of the organisation and be communicated to all workers. The living wage to be applied should come from the following non-exhaustive list of standards: Fair Wage Network, Ethical Trading Initiative Base Code, Social Accountability International SA8000 Standard, and the Global Living Wage Coalition Anker Methodology.

E.5 THE GLOBAL GOALS FOR SUSTAINABLE DEVELOPMENT (UN SDGS)

- E.5.1 The group must seek to support the social, economic and institutional development of the community in which it operates and support community initiatives.
- E.5.2 Investing in communities is in most cases a voluntary business activity. However, it is increasingly an important opportunity to work in partnership with others. A strategic approach to community development can work to align company objectives with existing and future community development plans and regional development aspirations as well as alignment with the ambitions of the Sustainable Development Goals.
- E.5.3 Best practice approaches to investment in community development include:
1. An approach that is participatory, drawing on relevant expertise to consider any unintended consequences and build a robust understanding of the local, regional and national needs and aspirations, and is an opportunity to work in partnership with others;
 2. Convey the aims of your initiatives, the key principles that underlie the initiative, and seek to understand and communicate the expectations of any stakeholders involved;
 3. Ensure that monitoring frameworks are in place to evaluate the impacts, learnings and improvements of all initiatives, ensuring that any adjustments can be implemented to guarantee success over the duration of a programme;
 4. Seek to involve community members as much as possible in the decision-making, governance and review of the initiative to ensure support and success;
 5. Identify opportunities to align core business activities to support key social and environmental needs including, for example, selecting local suppliers for business needs; local employment opportunities in your business or through a supplier/partner; workforce development programmes to improve the skills of employees.
- E.5.4 The Sustainable Development Goals were adopted during the UN Sustainable Development Summit in 2015. There are 17 goals, and 169 related targets covering all aspects of life. They are as follows:
1. No poverty
 2. Zero hunger
 3. Good health and well-being
 4. Quality education
 5. Gender equality
 6. Clean water and sanitation
 7. Affordable and clean energy
 8. Decent work and economic growth
 9. Industry, innovation and infrastructure
 10. Reduced inequalities
 11. Sustainable cities and communities
 12. Responsible consumption and production
 13. Climate action
 14. Life below water
 15. Life on land
 16. Peace, justice and strong institutions
 17. Partnership for the Global Goals
- E.5.5 The group may already have developed its own approach and strategy to identifying opportunities and programme designs that support the achievement of the Sustainable Development Goals. In instances where the group does not have an implementation approach and is keen to do so, the following is simple suggested implementation approach:
1. Consider existing programmes: Identify existing programmes that the group supports that promotes the achievement of the Sustainable Development Goals.

2. Prioritise: Understand the Sustainable Development Goals and prioritise which Sustainable Development Goals the group can support. This could be based on identifying which of the Sustainable Development Goals the group has the most significant impact on (positive or negative), and identifying which Sustainable Development Goals are prioritised at the local and national level.
 3. Set Strategy and Targets: The group can define how core business strategy can contribute positively to supporting prioritised Sustainable Development Goals. The group can set its own targets to measure impacts and foster better performance, thereby being able to demonstrate its commitment to sustainable development.
 4. Track progress and communicate: measure performance using relevant indicators and identify opportunities to improve delivery or effectiveness and inform additional approaches to impact. Communicate the impacts to relevant internal and external stakeholders.
 5. Integrate: Seek to eventually integrate sustainability into core business strategy and governance through embedding sustainable development targets across multiple functions.
- E.5.6 Businesses can directly and indirectly contribute to supporting the achievement of the global goals. Direct impacts could include the following examples. Please note that these are just examples, for illustrative purposes only, and should not be read as suggested approaches/strategies that businesses should adopt:
1. Climate Action: the group aims to ensure 50% of its key business operations are carbon neutral by 2025.
 2. Gender Equality: the group aims to have 50% female representation on its Board by 2025.
 3. Decent work and economic growth: the group has established a youth empowerment policy and initiative – 50% of all annual new hires shall be young people between the ages of 21–26 years and will be given development opportunities during their first year.
- E.5.7 Indirect impacts could include the following examples. Please note that these are just examples, for illustrative purposes only, and should not be read as suggested approaches/strategies that businesses should adopt:
1. Health and welfare: the group has committed to building a cancer ward in the local hospital, due for completion in 2020. The management of the ward will be handed over to hospital management on completion of the ward.
 2. Quality education: the group has built a computer laboratory in the local secondary school and pays for the annual maintenance and running costs.
 3. Decent work and economic growth; industry, innovation and infrastructure: the group supports an enterprise development fund, providing small and medium-sized social enterprises with loans to start or expand their businesses.

F GOLD, PLATINUM GROUP METALS, SILVER AND COLOURED STONES

- F.5.1 For RJC Members wishing to opt in for RJC certification through the BPP Programme and to whom this section applies, please refer to the Responsible Jewellery Council Standards for further details on the requirements.

G INTEGRITY OF THE BPP PROGRAMME

- G.5.1 The group/entity/facility must demonstrate they have participated in the BPP Assurance Programme in good faith.
- G.5.2 Participating in the BPP Assurance Programme requires those completing the workbook to answer the questions with full explanation and evidence. Answers must be tailored to the specific business needs of the group/entity/facility in question.
- G.5.3 Where consultants have been used to support the completion of the workbook, this must have been reviewed by a member of senior management before submission. Evidence of shared answers across different groups is not permitted.
- G.5.4 The autofill function on the SMART System aims to ease the completion of the workbook and participation in the BPP Assurance Programme. Answers must not be repeated year on year without being updated to reflect any changes to the business.

FURTHER INFORMATION AND USEFUL LINKS

A. BUSINESS RESPONSIBILITIES

- Transparency International
www.transparency.org/
- OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (1997)
www.oecd.org/document/21/0,3343,en_2649_34859_2017813_1_1_1_1,00.html
- UN Global Compact – Principle 10 on Anti-Corruption (2004)
www.unglobalcompact.org/AboutTheGC/TheTenPrinciples/anti-corruption.html
- UN Convention against Corruption (2003)
www.unodc.org/unodc/en/corruption/index.html
- Publish What You Pay – aimed at natural resource extraction companies
www.publishwhatyoupay.org
- World Economic Forum – Partnering against Corruption
<https://www.weforum.org/communities/partnering-against-corruption-initiative>
- Financial Action Task Force (FATF) – an international policy making organisation established to counter criminal use of financial systems
www.fatf-gafi.org
- World Bank Group – Anti-Money Laundering and Combating the Financing of Terrorism
<https://www.worldbank.org/en/search?q=Anti-Money+Laundering+and+Combating+the+Financing+of+Terrorism+>
- UN Global Programme against Money Laundering
www.unodc.org/unodc/en/money-laundering/index.html
- International Money Laundering Information Network (IMoLIN)
www.imolin.org/imolin/index.html
- Basel Committee on Banking Supervision
www.bis.org/bcbs/index.htm
- Jeweler's Vigilance Committee (US A) – guidance on legal compliance and anti-money laundering issues
www.jvclegal.org/
- The Kimberley Process Certification Scheme
www.kimberleyprocess.com
- Information by the World Diamond Council on KPCS and SoW
www.diamondfacts.org
- Jewelers of America
www.jewelers.org
- The Diamond Development Initiative
www.ddiglobal.org
- Global Witness
www.globalwitness.org

B. SOCIAL RESPONSIBILITIES

- International Labour Organisation (ILO) – Employment relationship
https://ilo.org/ifpdial/areas-of-work/labour-law/WCMS_CON_TXT_IFPDIAL_EMPREL_EN/lang-en/index.htm
- International Labour Organisation (ILO) – The Employment Relationship: An Annotated Guide to Recommendation 198
https://www.ilo.org/wcmsp5/groups/public/-ed_dialogue/-dialogue/documents/publication/wcms_172417.pdf
- ACAS – Advisory Handbook on Discipline and Grievances at Work (UK)
www.acas.org.uk/index.aspx?articleid=890
- CIP D – Discipline and Grievances at Work (UK)
www.cipd.co.uk/subjects/emplaw/discipline/disciplingrievprocs.htm
- Smart Manager – Workplace discipline
www.smartmanager.com.au/web/au/smartmanager/en/pages/115_work.html
- International Labour Organisation (ILO) – list of health and safety conventions
https://www.ilo.org/global/topics/safety-and-health-at-work/areasofwork/occupational-health/WCMS_108547/lang-en/index.htm#:~:text=Main%20ILO%20Conventions%20and%20Recommendations%20on%20Occupational%20Health,Health%20Services%20C161%20Occupational%20Health%20Services%20Convention%2C%201985
- ILO SafeWork programme – information and resources
https://www.ilo.org/legacy/english/protection/safework/worldday/facts_eng.pdf
- Universal Declaration of Human Rights – Articles 2, 7 and 23
<https://www.ohchr.org/en/human-rights/universal-declaration/translations/english>
- International Labour Organisation (ILO) – Equality and Discrimination
<https://www.ilo.org/global/topics/equality-and-discrimination/lang-en/index.htm>
- ILO – Database on Conditions of Work and Employment Laws (information on maternity protection legislation in more than 100 countries)
<http://www.ilo.org/public/english/protection/condtrav/database/>
- United Nations Global Compact Principle 6 – Discrimination
<https://www.unglobalcompact.org/what-is-gc/mission/principles/principle-6>
- Business and Human Rights Resource Centre
<https://www.business-humanrights.org/en/>
- International Finance Corporation – Good Practice Note on Non-Discrimination and Equal Opportunity (2006)
<https://www.ifc.org/wps/wcm/connect/3e1fb117-1555-410c-85b7-02a7f381a657/NonDiscrimination.pdf?MOD=AJPERES&CVID=jkD10N8>
- ILO – Database on Conditions of Work and Employment Laws (information on minimum wages legislation in more than 100 countries)
<http://www.ilo.org/public/english/protection/condtrav/database/>
- ILO – Minimum Wages Policy
<https://www.ilo.org/global/topics/wages/minimum-wages/lang-en/index.htm>
- SA 8000 Social Accountability International Standard (2001) – Compensation
<https://sa-intl.org/programs/sa8000/>
- International Programme on the Elimination of Child Labour (IPE C)
www.ilo.org/ipec/index.htm
- United Nations Global Compact – Principle 5 on Child Labour
<https://www.unglobalcompact.org/what-is-gc/mission/principles/principle-5>
- ILO Convention 138 on Minimum Age (1973)
https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C138
- ILO Recommendation 146 on Minimum Age (1973)
https://www.ilo.org/dyn/normlex/en/f?p=1000:12100::NO:12100:P12100_INSTRUMENT_ID:312484
- ILO Convention 182 on the Worst Forms of Child Labour (1999)
https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C182
- United Nations Global Compact – Principle 4 on Forced and Compulsory Labour
www.unglobalcompact.org/AboutTheGC/TheTenPrinciples/Principle4.html
- ILO Special Action Programme to Combat Forced Labour – information resources
www.ilo.org/sapfl/Informationresources/lang-en/index.htm

- ILO Convention 29 on Forced or Compulsory Labour (1930)
https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C029
- ILO Convention 105 concerning the Abolition of Forced Labour (1957)
https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:55:0::55:P55_TYPE,P55_LANG,P55_DOCUMENT,P55_NODE:CON,en,C105,/Document
- United Nations – Universal Declaration of Human Rights
<https://www.un.org/sites/un2.un.org/files/2021/03/udhr.pdf>
- United Nations Office of the High Commissioner for Human Rights
<https://www.ohchr.org/en/what-are-human-rights>
- Business and Human Rights – Jewellery
<https://www.business-humanrights.org/en/latest-news/?&search=jewellery&language=en>
- Human Rights Watch – Business and Human Rights
<http://www.hrw.org/doc/?t=corporations>
- 2008 Report of the Special United Nations Representative on the issue of human rights and business, John Ruggie
www.reports-and-materials.org/Ruggie-report-7-Apr-2008.pdf
- Human Rights Translated: A Business Reference Guide
https://www.ohchr.org/sites/default/files/Documents/Issues/Business/Human_Rights_Translated_web.pdf
- ICMM publication 'Human Rights in the Metals and Mining Industry'
<https://www.icmm.com/en-gb/guidance/social-performance/2012/human-rights-due-diligence>
- Universal Declaration of Human Rights – Article 20
<https://www.un.org/sites/un2.un.org/files/2021/03/udhr.pdf>
- ILO Declaration on Fundamental Principles and Rights at Work
https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C087
- ILO Convention 98 – Right to Organise and Collective Bargaining (1949)
https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C098
- UN Global Compact Principle 3 – Freedom of Association and Collective Bargaining
<https://www.unglobalcompact.org/what-is-gc/mission/principles/principle-3>
- Ethical Trading Initiative – Base Code
<https://www.ethicaltrade.org/eti-base-code>
- Business and Human Rights Resource Centre
www.business-humanrights.org/Home

C. ENVIRONMENTAL RESPONSIBILITIES

- International Organisation for Standardisation (ISO) – ISO 14000 series (Environmental Management Systems) <https://www.iso.org/standard/60857.html>
- International Finance Corporation (IFC) Performance Standards and EHS Guidelines https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/ehs-guidelines
- Business for Social Responsibility – Overview of Business and the Environment www.bsr.org/research/issue-brief-details.cfm?DocumentID=49037
- United Nations Global State of the Environment Report www.unep.org
- United Nations Division for Sustainable Development www.un.org/esa/sustdev/
- United Nations Global Compact www.unglobalcompact.org
- Global Reporting Initiative www.globalreporting.org
- US EP A Publications www.epa.gov
- US EP A Small Business Gateway www.epa.gov/smallbusiness/
- Environment Canada Publications www.ec.gc.ca
- UK Environment Protection Agency Publications www.environment-agency.gov.uk
- Friends of the Earth Scotland – Green Travel Plan <http://www.foe-scotland.org.uk/>
- United Nations Framework Convention on Climate Change – Essential Background https://unfccc.int/?gclid=EAlalQobChMIgNO-4luZ-gIVCurtCh2ACgr8EAAAYASAAEgIgj_D_BwE
- International Emissions Trading Association <http://www.ieta.org/>
- Carbon Footprint – Reducing Your Impact www.carbonfootprint.com/
- Carbon Catalogue – Carbon Offset Directory <https://carbonfund.org/>
- Greenhouse Gas Protocol Initiative – Corporate Standard www.ghgprotocol.org/standards/corporate-standard
- Global Reporting Initiative – Sustainability Reporting <https://www.globalreporting.org/Pages/default.aspx>
- International Cyanide Management Code www.cyanidecode.org/
- Environment Protection Authority, Victoria (Australia) – Guidelines to waste assessment <https://www.epa.vic.gov.au/>
- Sustainable Business Associates – Downloadable environmental management tools. Includes good housekeeping checklists for small businesses (click on ‘Download Tools’) www.sba.hello.to/
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal <http://www.basel.int/portals/4/basel%20convention/docs/text/baselconvention-text-e.pdf>
- Bamako Convention <https://www.unep.org/explore-topics/environmental-rights-and-governance/what-we-do/meeting-international-environmental>
- The Zero Waste International Alliance www.zwia.org
- UK Department for Business, Energy & Industrial Strategy Greenhouse gas reporting: conversion factors 2020 <https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2020>
- WRI/WBCSD (2011) GHG Protocol Corporate Standard Revised Edition <https://ghgprotocol.org/corporate-standard>
- WRI/WBCSD (2015) GHG Protocol Scope 2 Guidance https://ghgprotocol.org/scope_2_guidance
- WRI/WBCSD (2013) GHG Protocol Corporate Value Chain (Scope 3) Standard <https://ghgprotocol.org/standards/scope-3-standard>
- WRI/WBCSD (2013) GHG Protocol Scope 3 Guidance <https://ghgprotocol.org/scope-3-technical-calculation-guidance>
- WRI/WBCSD (2013) GHG Protocol Scope 3 Guidance: Category 1 - Purchased goods and services https://ghgprotocol.org/sites/default/files/standards_supporting/Chapter1.pdf
- WRI/WBCSD (2013) GHG Protocol Scope 3 Guidance: Category 2 - Capital goods https://ghgprotocol.org/sites/default/files/standards_supporting/Chapter2.pdf
- WRI/WBCSD (2013) GHG Protocol Scope 3 Guidance: Category 3 - Fuel- and energy-related activities https://ghgprotocol.org/sites/default/files/standards_supporting/Chapter3.pdf

- WRI/WBCSD (2013) GHG Protocol Scope 3 Guidance: Category 4 - Upstream transportation and distribution
https://ghgprotocol.org/sites/default/files/standards_supporting/Chapter4.pdf
- WRI/WBCSD (2013) GHG Protocol Scope 3 Guidance: Category 5 - Waste generated in operations
https://ghgprotocol.org/sites/default/files/standards_supporting/Ch5_GHGP_Tech.pdf
- WRI/WBCSD (2013) GHG Protocol Scope 3 Guidance: Category 6 - Business travel
https://ghgprotocol.org/sites/default/files/standards_supporting/Chapter6.pdf
- WRI/WBCSD (2013) GHG Protocol Scope 3 Guidance: Category 7 - Employee commuting
https://ghgprotocol.org/sites/default/files/standards_supporting/Chapter7.pdf
- WRI/WBCSD (2013) GHG Protocol Scope 3 Guidance: Category 8 - Upstream leased assets
https://ghgprotocol.org/sites/default/files/standards_supporting/Chapter8.pdf
- WRI/WBCSD (2013) GHG Protocol Scope 3 Guidance: Category 9 - Downstream transportation and distribution
https://ghgprotocol.org/sites/default/files/standards_supporting/Chapter9.pdf
- WRI/WBCSD (2013) GHG Protocol Scope 3 Guidance: Category 10 - Processing of sold products
https://ghgprotocol.org/sites/default/files/standards_supporting/Chapter10.pdf
- WRI/WBCSD (2013) GHG Protocol Scope 3 Guidance: Category 11 - Use of sold products
https://ghgprotocol.org/sites/default/files/standards_supporting/Chapter11.pdf
- WRI/WBCSD (2013) GHG Protocol Scope 3 Guidance: Category 12 - End-of-life treatment of sold products
https://ghgprotocol.org/sites/default/files/standards_supporting/Chapter12.pdf
- WRI/WBCSD (2013) GHG Protocol Scope 3 Guidance: Category 13 - Downstream leased assets
https://ghgprotocol.org/sites/default/files/standards_supporting/Chapter13.pdf
- WRI/WBCSD (2013) GHG Protocol Scope 3 Guidance: Category 14 - Franchises
https://ghgprotocol.org/sites/default/files/standards_supporting/Chapter14.pdf
- WRI/WBCSD (2013) GHG Protocol Scope 3 Guidance: Category 15 - Investments
https://ghgprotocol.org/sites/default/files/standards_supporting/Chapter15.pdf
-

D. MINING RESPONSIBILITIES

- Extractive Industries Transparency Initiative
<https://eiti.org/>
- EI TI Fact Sheet – How to become a supporting company
<https://eiti.org/documents/how-become-supporting-company-non-extractive>
- EI TI Business Guide – How companies can support implementation
<https://eiti.org/sites/default/files/attachments/2012-01-03-How-to-Support-Extractive.pdf>
- EI TI – Advancing the EI TI in the Mining Sector
www.eiti.org/document/mining
- ICMM – EITI
<https://www.icmm.com/>
- ICMM Resource Endowment Initiative
https://hummedia.manchester.ac.uk/schools/seed/andes/seminars/ARoe_Presentation_Seminar3.pdf
- Transparency International
www.transparency.org/
- Publish What You Pay
www.publishwhatyoupay.org
- United Nations Declaration on the Rights of Indigenous Peoples (2007)
https://www.un.org/esa/socdev/unpfii/documents/DRIPS_en.pdf
- ILO Convention 169, Concerning Indigenous and Tribal Peoples in Independent Countries (1989)
https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:55:0::NO::P55_TYPE,P55_LANG,P55_DOCUMENT,P55_NODE:REV,en,C169,/Document
- ILO Convention 169 and the Private Sector – IFC Quick Note (2007)
https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/publications_handbook_ilo169_wci_1319577902926
- International Finance Corporation (IFC) Performance Standard 7 – Indigenous Peoples
[https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/performance-standards/ps7#:~:text=Indigenous%20Peoples%20\(2012\)&text=PS7%20seeks%20to%20ensure%20that,benefits%20in%20culturally%20appropriate%20ways](https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/performance-standards/ps7#:~:text=Indigenous%20Peoples%20(2012)&text=PS7%20seeks%20to%20ensure%20that,benefits%20in%20culturally%20appropriate%20ways)
- International Council on Mining and Metals (ICMM) – Indigenous Peoples project
<https://www.icmm.com/en-gb/our-principles/position-statements/indigenous-peoples>
- Association for Mineral Exploration British Columbia – Mineral Exploration, Mining and Aboriginal Community Engagement: A Guidebook (Canada)
<https://amebc.ca/wp-content/uploads/2017/04/aboriginal-engagement-guidebook-revised-may-2015.pdf>
- Sustainable Communities: Mining and Indigenous Governance (Americas)
https://www.focal.ca/pdf/indigenous_FOCAL_sustainable%20communities%20mining%20indigenous%20governance_March%202008.pdf
- Working with Indigenous Communities – Leading Practice Sustainable Development Program for the Mining Industry (Australia)
<https://www.industry.gov.au/sites/default/files/2019-04/lpsdp-working-with-indigenous-communities-handbook-english.pdf>
- Guidelines for Best Practice Flexible and Sustainable Agreement Making (Australia)
https://aiatsis.gov.au/sites/default/files/research_pub/2009-ntnu-best-practice-guidelines-agreements_3.pdf
- The Ethical Funds Company – Winning the Social License to Operate: Resource Extraction with Free, Prior and Informed Community Consent (2008)
<https://www.business-humanrights.org/fr/derni%C3%A8res-actualit%C3%A9s/pdf-winning-the-social-license-to-operate-resource-extraction-with-free-prior-and-informed-community-consent/>
- Oxfam Australia – Free, prior and informed consent
<https://www.oxfam.org.au/what-we-do/economic-inequality/mining/free-prior-and-informed-consent/>
- World Resources Institute – Business without Conflict: the business case for community consent
http://pdf.wri.org/development_without_conflict_fpic.pdf
- Communities and Small-Scale Mining (CASM) – hosted by World Bank Group
<http://www.artisanalmining.org/index.cfm>
- CASM Annual Conference 2009
http://www.artisanalmining.org/userfiles/file/9th%20ACC/background_papers.pdf

- CommDev – Artisanal and Small-Scale Mining
<https://commdev.org/topic/artisanal-and-small-scale-mining/>
- CommDev/CASM - Mining Together: Large scale mining meeting artisanal mining: a framework for action (2008)
<https://commdev.org/publications/mining-together-large-scale-mining-meets-artisanal-mining/>
- Alliance for Responsible Mining
<http://www.communitymining.org/>
- Diamond Development Initiative
<https://www.resolve.ngo/ddi.htm>
- Artisanal and Small Scale Mining in Asia Pacific Portal
<https://www.asmasiapacific.com/>
- International Labour Organisation (ILO) – Facts on Small Scale Mining
http://www.ilo.org/wcmsp5/groups/public/-dgreports/-dcomm/documents/publication/wcms_067582.pdf
- International Labour Organisation (ILO) – Social and labour issues in small-scale mines
https://www.ilo.org/global/publications/ilo-bookstore/order-online/books/WCMS_PUBL_9221114805_EN/lang-en/index.htm
- Global Mercury Project – removal of barriers to the introduction of cleaner artisanal gold mining and extraction technologies
<https://www.thegef.org/projects-operations/projects/1223>
- AngloGold Ashanti – approach to artisanal and small scale mining
<https://www.anglogoldashanti.com/sustainability/approach/>
- World Gold Council – Artisanal Mining
<https://www.gold.org/esg/artisanal-and-small-scale-gold-mining>
- International Cyanide Management Code for the gold mining industry
www.cyanidecode.org/
- Material Safety Data Sheets – information
https://www.ecoonline.com/chemical-safety/sds-management-software?utm_term=material%20safety%20data%20sheet%20database&utm_campaign=J+-+UK/IE++BOFU+-+sds+management+software&utm_source=adwords&utm_medium=ppc&hsa_acc=7301477093&hsa_cam=16078624792&hsa_grp=132597744413&hsa_ad=579537629002&hsa_src=g&hsa_tgt=kwd-365525770285&hsa_kw=material%20safety%20data%20sheet%20database&hsa_mt=e&hsa_net=adwords&hsa_ver=3&gclid=EAlaQobChMli_uMx82Z-gIVm-vtCh1JTASmEAAAYASAAEgleZfD_BwE
- Globally Harmonized System of Classification and Labelling of Chemicals (GHS)
http://www.unece.org/trans/danger/publi/ghs/ghs_welcome_e.html http://www.unece.org/trans/danger/publi/ghs/implementation_e.html
- Stockholm Convention on Persistent Organic Pollutants
www.pops.int/
- The Montreal Protocol on Substances that Deplete the Ozone Layer
www.theozonehole.com/montreal.htm
- The Rotterdam Convention on the Prior Informed Consent for Certain Hazardous Chemicals & Pesticides in International Trade
www.pic.int
- United Nations Environment Programme (UNEP) Global Mercury Partnership
<https://www.unep.org/globalmercurypartnership/>
- State of Nevada – Mercury air emissions program
<https://www.law.cornell.edu/regulations/nevada/chapter-445B/air-pollution/nevada-mercury-air-emissions-control-program>
- ILO Convention 176 Safety and Health in Mines (1995)
https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C176
- ILO Code of Practice on Safety and Health in Opencast Mines
www.ilo.org/public/english/protection/safework/cops/english/download/e920175.pdf
- ILO Recommendation 183 on Safety and Health in Mines (1995)
https://www.ilo.org/dyn/normlex/en/f?p=1000:12100::NO:12100:P12100_INSTRUMENT_ID:312521
- ICMM Sustainable Development framework – Health and Safety principle 5
www.icmm.com/our-work/sustainable-development-framework

- World Bank/International Finance Corporation – Environment, Health, and Safety Guidelines
https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/ehs-guidelines
- Equator Principles
<https://equator-principles.com/>
- National Skin Centre - Nickel Allergy
<https://www.nsc.com.sg/patients-and-visitors/Health-Library/Conditions-And-Treatments/Pages/Nickel-Allergy.aspx>
- United States Nuclear Regulatory Commission – Fact Sheet on Irradiated Gemstones
www.nrc.gov/reading-rm/doc-collections/fact-sheets/irradiated-gemstones.html
- Awareness and Preparedness at the Local Level (APELL) for Mining – Background
<https://www.unep.org/explore-topics/disasters-conflicts/what-we-do/preparedness-and-response/awareness-and-preparedness>
- ICMM – Good Practice in Emergency Preparedness and Response
<https://www.icmm.com/en-gb/guidance/health-safety/2004/emergency-preparedness-and-response>
- Mining Association of Canada – Crisis Management Guide
<https://mining.ca/resources/guides-manuals/crisis-management-and-communications-planning-reference-guide/>
- ICMM Guidance on Health Risk Assessment
<https://www.icmm.com/en-gb/our-work/innovation-for-sustainability/health-and-safety/risk-management/health-risk-assessment>
- International Commission on Large Dams
www.icold-cigb.net/
- ICMM “Good practice guidance for mining and biodiversity”
<https://www.icmm.com/en-gb/guidance/environmental-stewardship/2006/mining-and-biodiversity>
- International Finance Corporation (IFC) Environmental Health and Safety Guidelines – Mining (December 2007)
<https://www.ifc.org/wps/wcm/connect/595149ed-8bef-4241-8d7c-50e91d8e459d/Final%2B-%2BMining.pdf?MOD=AJPERES&CVID=nPthex1&id=1323153264157>
- Nevada Division of Environment Protection – Statutes and Regulations
<https://ndep.nv.gov/nevada-recycles>
- Mining Association of Canada - A Guide to the Management of Tailings facilities
<https://mining.ca/our-focus/tailings-management/tailings-guide/>
- Mining Association of Canada - Developing an Operation, maintenance and surveillance manual for tailings and water management facilities
<https://mining.ca/resources/guides-manuals/developing-an-operation-maintenance-and-surveillance-manual-for-tailings-and-water-management-facilities/>
- Best Practice Guidelines for Tailings Management
<https://www.industry.gov.au/sites/default/files/2019-04/lpsdp-tailings-management-handbook-english.pdf>
- Mine Environment Neutral Drainage (MEND) Program – Canada
<https://www.nrcan.gc.ca/our-natural-resources/minerals-mining/mining-resources/national-mining-collaborations/18298>
- International Network for Acid Prevention (IN AP)
<http://www.inap.com.au/>
- Global Acid Rock Drainage (GARD) Guide
http://www.gardguide.com/index.php/Main_Page
- Australian Centre for Minerals Extension and Research (ACMER)
https://www.sourcewatch.org/index.php/Australian_Centre_for_Minerals_Extension_and_Research
- Acid Drainage Technology Initiative (ADTI) Metal Mining Initiative
<https://www.osmre.gov/programs/mine-drainage-technology-initiative>
- Partnership for Acid Drainage Remediation in Europe (PADRE)
www.padre.imwa.info
- South African Water Research Commission (WRC of South Africa)
www.wrc.org.za
- Minerals Council of Australia – Enduring Value Framework
<https://www.minerals.org.au/enduring-value-framework>

- Convention for Biological Diversity
www.cbd.int/
- World Heritage Areas – UNESCO
<https://whc.unesco.org/en/list/?type=natural#:~:text=World%20Heritage%20List%201%20Albania%20Ancient%20and%20Primeval,Honduras%20R%C3%ADo%20Pl%C3%A1tano%20Biosphere%20Reserve%20...%20More%20items>
- Convention on Wetlands of International Importance – Ramsar Convention
www.ramsar.org
- The Integrated Biodiversity Assessment Tool
<https://www.ibat-alliance.org/>
- Global Biodiversity Information Facility
<http://www.gbif.org/>
- IFC Performance Standard 6 – Biodiversity Conservation and Sustainable Natural Resource Management
https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/performance-standards/ps6
- International Union for Conservation of Nature (IUCN) – Identification and Gap Analysis of Key Biodiversity Areas (2007)
http://www.iucn.org/about/work/programmes/gpap_home/gpap_capacity2/gpap_bpg/?376/Identification-and-gap-analysis-of-key-biodiversity-areas-targets-for-comprehensive-protected-area-systems
- IUCN – Guidelines for Applying Protected Area Categories
http://www.iucn.org/about/work/programmes/gpap_home/gpap_capacity2/gpap_bpg/
- IUCN Red List of Threatened Species <http://www.iucnredlist.org/>
- IUCN-ICMM Dialogue [www.iucn.org/about/work/programmes/business/bbp_our_work/bbp_mining/
www.icmm.com/page/1672/iucn-icmm-dialogue](http://www.iucn.org/about/work/programmes/business/bbp_our_work/bbp_mining/www.icmm.com/page/1672/iucn-icmm-dialogue)
- ICMM Position Statement – Mining and Protected Areas
<https://www.icmm.com/en-gb/our-principles/position-statements/protected-areas>
- ICMM “Good practice guidance for mining and biodiversity”
<https://www.icmm.com/en-gb/guidance/environmental-stewardship/2006/mining-and-biodiversity>
- ICMM Mine Closure
<https://www.icmm.com/en-gb/our-work/governance-and-transparency/mine-closure>
- Anglo American Social Way
<https://socialway.angloamerican.com/en>

E. CORPORATE SOCIAL INVESTMENT AND BUSINESS IMPACT

- United Nations Global Goals for Sustainable Development
<http://www.globalgoals.org/>
- Make it your business: engaging with the Sustainable Development Goals; Pricewaterhouse Coopers
https://www.pwc.com/gx/en/sustainability/SDG/SDG%20Research_FINAL.pdf

RESOURCE APPENDIX

The following sources have been used to develop the BPP Requirements and are also useful reference resources:

- Background paper for ICEM World Conference for the Diamond, Gem, Ornament and Jewellery Production Section, Bangkok 23–25 November 2001
- De Beers Group Best Practice Principles Leaflet
- Ethical Trading Initiative (ETI)
- ILO Declaration on Fundamental Principles and Rights at Work
- ILO Recommendation No. 129 on Communications within the Undertaking (1967)
- Indian Factories Act (1948, amended 1987)
- International Covenant on Economic, Social and Cultural Rights (ICESCR)
- International Labour Organisation (ILO) Conventions
- ISO 18323 Standard on 'Jewellery – Consumer confidence in the diamond industry'
- Kimberley Process Certification Scheme, section 1
- Norms on the Responsibilities of Transnational Corporations and Other Business Enterprises with regard to Human Rights (UN Norms)
- The Rio Declaration on Environment and Development (RD)
- Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy (TDP)
- World Diamond Council, Essential Guide to Implementing the Kimberley Process.
- World Jewellery Confederation (CIBJO) Diamond Books

DE BEERS GROUP

DE BEERS GROUP™ is a Trade Mark of De Beers UK limited.

© De Beers UK limited 2018-2023