





















Compliance table




This table sets out how the Global Reporting Initiative (GRI) Reporting Framework has been applied in our sustainability reporting and how our reporting links to the UN Global Compact and UN Millennium Development Goals. It primarily covers the 2008 Report to Society (RtS), but also makes reference to the 2008 Operating and Financial Review (OFR) and our online sustainability content. The table has been prepared in order to demonstrate the highest standards of reporting and transparency. Application of the GRI Reporting Framework forms a key part of our commitment to continuous improvement and to achieving the highest levels of sustainability performance. It is our belief that we have applied the GRI Reporting Framework to the highest A+ standard.

Indicator shading	Extent of reporting	UN mechanisms
"Core" indicators	 Partially reported	1 UN Global Compact Principles
"Additional" indicators	 Fully reported	1 UN Millennium Development Goals








	Profile - GRI (G3) Sustainability Reporting Guidelines	Page reference	UN Extent	UN mechanisms	Notes
1	Strategy and analysis				
1.1	Statement from the most senior decision maker about the relevance of sustainability to the organisation and its strategy	2, 4			
1.2	Description of key impacts, risks and opportunities	8-10, 16-17, 32-33, 48-49, 66-67, 84-85, OFR			
2	Organisational profile				
2.1	Name of the organisation	Cover, 6, OFR			
2.2	Primary brands, products and/or services	OFR			
2.3	Operational structure including main divisions, operating companies, subsidiaries, joint ventures	6, OFR			
2.4	Location of organisation's headquarters	Cover, 6, OFR			
2.5	Number of countries where the organisation operates, names of countries with major operations or sustainability issues	6, OFR			
2.6	Nature of ownership and legal form	6, OFR			
2.7	Markets served (geographic breakdown, sectors served and types of customers/beneficiaries)	6, 23, 28-31, 44, OFR			
2.8	Scale of the organisation, including: number of employees; net sales; capitalisation and quantity of products provided	18-20, 23, 29, OFR			
2.9	Significant changes during the reporting period regarding size, structure or ownership	OFR			
2.10	Awards received in the reporting period	55, 78			













Profile - GRI (G3) Sustainability Reporting Guidelines		Page reference	UN Extent mechanisms	Notes
3	Report parameters			
Report profile				
3.1	Reporting period (e.g., fiscal/calendar year) for information provided	Cover, 6, 8, OFR	📖	
3.2	Date of most recent previous report (if any)	Cover, 2, 6, OFR	📖	
3.3	Reporting cycle (annual, biennial)	Cover, 2, 6, OFR	📖	
3.4	Contact point for questions regarding the report or its contents	Cover	📖	
Report scope and boundary				
3.5	Process for defining report content, including: determining materiality; prioritising topics; identifying stakeholders	8 to 12	📖	
3.6	Boundary of the report (countries, divisions, subsidiaries, leased facilities, joint ventures, suppliers)	Cover, 6, OFR	📖	
3.7	State any specific limitations on the scope or boundary of the report	Cover, 6, OFR	📖	
3.8	Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations and other entities	Cover, 6, OFR	📖	
3.9	Data measurement techniques and the bases of calculations underlying indicators and other information	20, 21, 57, 64, 72, 74, 85, 87, OFR	📖	
3.10	Explanation of the effect of any re-statements of information provided in earlier reports and the reasons behind them	85	📖	
3.11	Significant changes from previous reporting periods in scope, boundary, measurement methods	GRI table	📖	No significant changes were made to scope, boundary or measurement methods other than described elsewhere in the Report to Society 2008 (e.g. mine disposals).
GRI content index				
3.12	Table identifying the location of the Standard Disclosures in the report	GRI table	📖	
Assurance				
3.13	Policy and current practice with regard to seeking external assurance for the report	6, 8, 11, 37, 39, 45, 101-105	📖	










Profile - GRI (G3) Sustainability Reporting Guidelines		Page reference	Extent	UN mechanisms	Notes
4	Governance, commitments and engagement				
Governance					
4.1	Governance structure of the organisation, including committees under the highest governance body	10-11, OFR		10	
4.2	Indicate whether the chair of the highest governance body is also an executive officer	OFR		10	
4.3	The number of members of the highest governance body that are independent and/or non-executive members	OFR		10	
4.4	Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body	OFR			
4.5	Linkage between compensation for members of the highest governance body, senior managers and executives and the organisation's performance (including social/environmental performance)	GRI table		10	<p>The Remuneration Committee comprises a majority of directors who do not hold executive office in De Beers, its subsidiaries or investments. It approves remuneration for executive directors on the Board and other senior managers including those on the Executive Committee.</p> <p>The Remuneration Committee ensures that rewards are linked to both group and individual performance and are commensurate with market rates. Both group and individual performance include non-financial performance metrics such as social and environmental criteria, which include adherence to effective risk management and compliance. The exact remuneration structures of senior managers and other employees at subsidiaries and investments is informed by group policy and performance, but determined separately by the respective boards, committees and finance and human resource functions of each company.</p>
4.6	Processes in place for the highest governance body to ensure conflicts of interest are avoided	GRI table		10	<p>A number of structures already exist to ensure conflict of interest is avoided in line with external best practice standards. These include the DTC Diamond Best Practice Principles (BPPs) and the Directors Conflict of Interest Policy. Existing statements in our Code of Conduct and Business Ethics also require all personnel to act in the best interests of De Beers and its shareholders. The Code also prohibits involvement in business interests that conflict with the Principles and policies of the Family of Companies or that might compromise independence in decision-making.</p>





Profile - GRI (G3) Sustainability Reporting Guidelines		Page reference	Extent	UN mechanisms	Notes
4.7	Process for determining the qualifications and expertise of the members of the highest governance body for guiding the organisation's strategy on economic, environmental and social topics	GRI table		1-10, 1-8	<p>The appointment of directors is based primarily on the extent to which they represent the interests of the shareholders and are able to provide strategic guidance on the direction, values and performance of the Company. This includes with respect to the Principles, ECOHS policies and related sustainability and reputational risk management.</p> <p>The term of office for each director is limited by law and the constitutional documents of the Company to six years, but directors are eligible for re-election by the shareholders. The terms of office of those directors appointed by the majority consent of shareholders has been limited to periods of three years, with the opportunity for re-election by shareholders. Shareholders also have the ability to terminate appointments, if necessary, prior to the completion of the appointed term of office. Board continuity is fundamental to the sustained success of the De Beers group.</p> <p>This requires an ongoing resource and skills identification to be performed by the Board in consultation with shareholders. Board members are able to supplement their own expertise on issues pending decision by obtaining independent professional advice. The Company Secretary coordinates the provision of professional advice to ensure that advisors are appropriately briefed, provided with relevant information and paid on completion of the assignment. The results of any advisory engagement are also made available to other members of the Board.</p>
4.8	Internally developed statements of mission or values, codes of conduct and principles relevant to economic, environmental and social performance and the status of their implementation. Explain the degree to which these are applied across the organisation and relate to international standards	4, 6, 8, 10-11, 39, 42-43, 44-46, 106-107		1-10, 1-8	
4.9	Procedures of the highest governance body for overseeing the identification and management of economic, environmental and social performance, including risks, opportunities and compliance with international standards	10-11		1-10, 1-8	
4.10	Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental and social performance			1-10, 1-8	











Profile - GRI (G3) Sustainability Reporting Guidelines		Page reference	Extent	UN mechanisms	Notes
Commitments to external initiatives					
4.11	Explanation of how the precautionary approach or principle is addressed by the organisation	10-15,22-23, 38-42, 44-46, 50-52, 54-59, 60, 63, 68-71, 78-83, 86-99		7	
4.12	Externally developed economic, environmental and social charters, principles or other initiatives to which the organisation subscribes or endorses	Cover, 4-6, 8, 15, 34, 37, 38-39, 42-44, 46-47, 55-56, 86-87, 89, 97, 106	📖	1 2 4 5 10, 1, 4-8	
4.13	Memberships in associations and/or advocacy organisations in which the organisation: has positions in governance bodies; participates in projects or committees; provides substantive funding; or views membership as strategic	Cover, 5, 25, 34, 37-38, 42-43, 46-47, 60, 88, 90, 97	📖		
Stakeholder engagement					
4.14	List of stakeholder groups engaged by the organisation: communities; civil society; customers; shareholders and providers of capital; suppliers; and employees, other workers and their trade unions	12, 22-25, 31, 36, 38, 43, 44-47, 50, 69-71, 88-90, 97	📖	1 2 4 5 8 10, 1-8	
4.15	Basis for identification and selection of stakeholders with whom to engage	12, 22-25, 31, 36, 38, 43, 44-47, 50, 68-71, 92	📖		
4.16	Approaches to stakeholder engagement, including frequency of engagement by type and group	12, 22-25, 31, 36, 38, 43, 44-47, 50, 68-71, 77, 89, 92	📖		
4.17	Key topics and concerns that have been raised through stakeholder engagement and how the organisation has responded to those key topics and concerns, including through its reporting	13, 22-24, 31, 36, 43, 50-52, 68-71, 88-91, 97	📖	1-10, 1-8	




Performance indicators - GRI (G3) Sustainability Reporting Guidelines		Page reference	Extent	UN mechanisms	Notes
Economic performance indicators					
Aspect: Economic performance indicators					
EC1	Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings and payments to capital providers and governments	18-21		1-8	
EC2	Financial implications and risks/opportunities to the organisation's activities due to climate change	86-91		7	
EC3	Coverage of the organisation's defined benefit pension plan obligations	GRI table			Employee benefits differ between operations and tend to include leave, sick leave, maternity and paternity leave, medical aid, pension plans, life insurance and compensation for injuries or disease at work. In South Africa, for example, employees have access to the De Beers Pension Fund, which manages defined benefits and defined contributions for its members.
EC4	Significant financial assistance received from government	22			
Aspect: Market presence					
EC5	Range of ratios of standard entry level wage compared to local minimum wage at significant locations of operation	GRI table			De Beers pays more than the local minimum wage in all of the countries in which it operates.
EC6	Policy, practices and proportion of spending on locally based suppliers at significant locations	20-21, 66, 73, GRI table			See Figures 1a and 1b.
EC7	Procedures for local hiring and proportion of senior management and workforce hired from the local community	GRI table			At DBCM, a total of 78.2% of our permanent workforce is made up of Historically Disadvantaged South Africans (HDSAs) (excluding white women). HDSAs also make up 41.0% of managers at DBCM. At Debswana, a total of 95.5% of the workforce is made up of local citizens. Local citizens also make up 81.3% of managers at Debswana. At Namdeb, a total of 86.9% of our permanent workforce is made up of Historically Disadvantaged Namibians (HDNs). HDNs also make up 49.6% of managers at DBCM.









Performance indicators - GRI (G3) Sustainability Reporting Guidelines		Page reference	Extent	UN mechanisms	Notes
Aspect: Indirect economic impacts					
EC8	Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind or pro bono engagement	73-74		1-8	
EC9	Understanding and describing significant indirect economic impacts, including the extent of impacts	16-31, 72-77			
Environmental performance indicators					
Aspect: Materials					
EN1	Materials used by weight or volume	GRI table		7, 8	The treatment process does in some cases require hazardous materials. Replacing, minimising and eliminating these hazardous substances forms the basis of our hazardous materials and waste strategy. The removal of diamonds from surrounding ore does not require the use of hazardous substances. See Figure 2.
EN2	Percentage of materials used that are recycled input materials	GRI table		7, 8	Waste is separated into categories at source to ensure appropriate disposal and recycling. See Figure 3.
Aspect: Energy					
EN3	Direct energy consumption by primary energy source	88-90		7, 8	
EN4	Indirect energy consumption by primary energy source	88-90		7, 8	
EN5	Energy saved due to conservation and efficiency improvements	90-91		7, 8	
EN6	Initiatives to provide energy-efficient or renewable energy based products and services and reductions in energy requirements as a result of these initiatives	90-91		7, 8	
EN7	Initiatives to reduce indirect energy consumption and reductions achieved	90		7, 8, 9	
Aspect: Water					
EN8	Total water withdrawal by source	86-88		7, 8	This is currently provided in the different categories (potable and non-potable etc) except for the water withdrawn from the pit at Victor which is identified on p86-88.
EN9	Water sources significantly affected by withdrawal of water	86-89		7, 8	
EN10	Percentage and total volume of water recycled and reused	86-88		7, 8	










Performance indicators - GRI (G3) Sustainability Reporting Guidelines		Page reference	Extent	UN mechanisms	Notes
Aspect: Biodiversity					
EN11	Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	94, 96-97		7, 8	
EN12	Description of significant impacts of activities, products and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas	94, 96-97		7, 8	
EN13	Habitats protected or restored	82-83, 93, 95-96, 98-99		7, 8	
EN14	Strategies, current actions, and future plans for managing impacts on biodiversity	77, 82-85, 87, 933-94, 96-97		7, 8	
EN15	Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations	GRI table		7, 8	Is collected in Environmental Impact Assessments (EIAs) and associated specialist studies for every operation. Where relevant, mitigating actions are taken and included in our Environmental Management Plans (EMPs). Numbers of species not currently included in this report.
Aspect: Emissions, effluents and waste					
EN16	Total direct and indirect greenhouse gas emissions by weight	90-91		7, 8	
EN17	Other relevant indirect greenhouse gas emissions by weight	90-91		7, 8	
EN18	Initiatives to reduce greenhouse gas emissions and reductions achieved	90-91		7, 8	
EN19	Emissions of ozone-depleting substances by weight	n/a	n/a	7, 8	The amount of ozone-depleting substances produced by the Family of Companies is negligible.
EN20	NO, SO, and other significant air emissions by type and weight	91		7, 8	
EN21	Total water discharge by quality and destination	GRI table		7, 8	Water discharge data is not currently captured for our southern Africa operations because water in these countries is typically reused and recycled. Water discharge at our Canadian operations amounted to 27,000,000 m ³ in 2009 (2008: 26,000,000 m ³). This water is not used on the operations but is extracted due to natural inflow because of the high water table. This dewatering process in Canada to discharge excess water does nevertheless have an environmental impact that is managed.





Performance indicators - GRI (G3) Sustainability Reporting Guidelines		Page reference	Extent	UN mechanisms	Notes
EN22	Total weight of waste by type and disposal method	GRI table		7, 8	Waste is separated into categories at source to ensure appropriate disposal and recycling. Hazardous waste produced during the mining process is either responsibly stored onsite for future management or disposed of through certified hazardous waste sites. Waste from our Botswana and Namibian operations is generally disposed of through facilities in South Africa. See Figure 4.
EN23	Total number and volume of significant spills	94		7, 8	
EN24	Weight of transported, imported, exported or treated waste deemed hazardous under the terms of the Basel Convention and percentage of transported waste shipped internationally	GRI table		7, 8	Any movement of hazardous waste is conducted in full compliance with the Basel Convention for controlling trans-boundary movements of applicable hazardous wastes e.g. between Botswana and South Africa because no hazardous waste site exists in Botswana.
EN25	Identity, size, protected status, and biodiversity value of water bodies and related habitats significantly affected by the reporting organisation's discharges of water and runoff	n/a	n/a	7, 8	The nature of the diamond mining and recovery process (which relies on kinetic energy only) means runoff water does not contain any hazardous chemicals. As a result, there is negligible effect on local biodiversity.
Aspect: Products and services					
EN26	Initiatives to mitigate environmental impacts of products and services and extent of mitigation	n/a	n/a	7, 8	The latent environmental impact of diamonds as products are non-existent.
EN27	Percentage of products sold and their packaging materials that are reclaimed by category	n/a	n/a	7, 8	The nature of diamonds means they are rarely knowingly disposed of. Packaging is negligible.
Aspect: Compliance					
EN28	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations	GRI table		7, 8	The Family of Companies was not subject to any significant fines or non-monetary sanctions for non-compliance with laws and regulations in 2009.
Aspect: Transport					
EN29	Significant environmental impacts of transporting products and other goods and materials	n/a	n/a	7, 8	The environmental impacts of transporting diamonds and other goods and materials are (other than as described elsewhere in the Report to Society 2009) negligible.
Aspect: Overall					
EN30	Total environmental protection expenditures and investments by type	GRI table		7, 8	Accounting procedures, spending classifications and the structure of the Family of Companies mean this information is not available.












Performance indicators - GRI (G3) Sustainability Reporting Guidelines		Page reference	Extent	UN mechanisms	Notes
Social performance: labour practices indicators					
Aspect: Employment					
LA1	Total workforce by employment type, employment contract and region	20			
LA2	Total number and rate of employee turnover by age group, gender and region	53			
LA3	Benefits provided to full time employees that are not provided to temporary or part-time employees, by major operations	GRI table		3	Different operations offer various pensions and medical aid benefits for full time employees (as above). In South Africa, for example, the company subsidises medical aid benefits to permanent employees and their families.
Aspect: Labour management relations					
LA4	Percentage of employees covered by collective bargaining agreements	52		3	
LA5	Minimum notice period(s) regarding operational changes, including whether it is specified in collective agreements	53, GRI table		3	Employees at our Namibian operations are subject to a one month minimum notice period regarding operational changes. For employees at DBCM, De Beers Group Services (South Africa) and De Beers Marine (South Africa), a two month consultation process in addition to the one month notice period is applied where changes to our operational requirements are contemplated. At Debswana the notice period is either three months (for more junior grades) or six months (for more senior grades).
Aspect: Occupational health and safety					
LA6	Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programmes	56, GRI table		1	All mining staff are actively involved in health and safety activities. Employees and contractors are represented in joint committees and daily briefings with managers to monitor and advise on health and safety programmes.
LA7	Rates of injury, occupational diseases, lost days and absenteeism and number of work-related fatalities by region	54-56		1	
LA8	Education, training, counselling, prevention and risk-control programmes in place to assist workforce members, their families or community members regarding serious diseases	60-64		1	
LA9	Health and safety topics covered in formal agreements with trade unions	56		1	
Aspect: Training and education					
LA10	Average hours of training per year per employee by employee category	52			
LA11	Programmes for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings	51, 52			

Performance indicators - GRI (G3) Sustainability Reporting Guidelines		Page reference	Extent	UN mechanisms	Notes
LA12	Percentage of employees receiving regular performance and career development reviews	52-53, GRI table 			Our Talent Management Policy supports the recruitment, development, succession and retention of employees across the Family of Companies. It mandates the appointment of the best qualified internal or external candidates in line with job requirements and national legislation relating to employment equity. It also ensures employee performance is gauged against a defined set of key performance indicators, through regular dialogue and feedback. See Figure 5 (Please note that blank entries may indicate either a lack of employees at a relevant grade, or a lack of performance or career development review.)
Aspect: Diversity and equal opportunity					
LA13	Composition of governance bodies and breakdown of employees per category according to gender, age group, minority group membership and other indicators of diversity	OFR, GRI table 		6	<p>The Family of Companies is committed to ensuring its workforce is reflective of the societies in which we operate and to support government efforts to offer opportunities to previously disadvantaged groups.</p> <p>The Family of Companies will ensure designated groups have representation in decision-making positions that reasonably reflects the demographics of the country's economically active population. A number of structures including our Employment Equity Committee have been established in order to monitor our performance in this respect. They include management representatives, union representatives and functional personnel.</p> <p>The Family of Companies is actively supporting efforts to increase the proportion of women achieving senior management positions. This includes our support of the "Women in Mining" programme, which is facilitated by the Department of Minerals and Energy through the Da Vinci Institute of Technology. We also support the establishment of mentoring schemes within our operations. These schemes promote women in senior positions to share their experience and to motivate women in more junior positions to achieve their full professional potential.</p> <p>See Figures 6a and 6b.</p>
LA14	Ratio of basic salary of men to women by employee category	GRI table 		6	See Figures 7a and 7b.

Performance indicators - GRI (G3) Sustainability Reporting Guidelines		Page reference	Extent	UN mechanisms	Notes
Social performance: human rights indicators					
Aspect: Investment and procurement practices					
HR1	Percentage and total number of significant investment agreements that include human rights clauses or that have undergone human rights screening	GRI table		1 2	No significant investment agreements with the potential to directly affect human rights took place in 2009.
HR2	Percentage of significant suppliers and contractors that have undergone screening on human rights and actions taken	6, 32, 45-47, 65		1 2	
HR3	Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained	GRI table		1 2	According to submitted figures, 8,738 hours were spent on human rights training. A total of 1,083 employees participated in this process, representing 8.7% of the permanent workforce.
Aspect: Non-discrimination					
HR4	Total number of incidents of discrimination and actions taken	GRI table		1 2 6	Two incidents of alleged discrimination were reported at De Beers Canada. Both incidents were investigated and resolved.
Aspect: Freedom of association and collective bargaining					
HR5	Operations identified in which the right to exercise freedom of association and collective bargaining may be at significant risk, and actions taken	50, 52, GRI table		1-3	Trade union and employee associations have a strong presence and operate freely at all of our mining operations.
Aspect: Child labour					
HR6	Operations identified as having significant risk for incidents of child labour and measures taken to contribute to the elimination of child labour	GRI table		1 2 5	No operations have been identified as presenting a significant risk for child labour.
Aspect: Forced and compulsory labour					
HR7	Operations identified as having significant risk for incidents of forced or compulsory labour and measures taken to contribute to the elimination of forced or compulsory labour	GRI table		1 2 4	No operations have been identified as presenting a significant risk for forced or compulsory labour.
Aspect: Security practices					
HR8	Security personnel trained in the organisation's policies or procedures concerning aspects of human rights			1 2	
Aspect: Indigenous rights					
HR9	Total number of incidents of violations involving rights of indigenous people and actions taken	GRI table		1 2	No incidents of violations involving rights of indigenous people were recorded in 2009.

Performance indicators - GRI (G3) Sustainability Reporting Guidelines		Page reference	Extent	UN mechanisms	Notes
Social performance: society performance indicators					
Aspect: Community					
SO1	Nature, scope, and effectiveness of any programmes and practices that assess and manage the impacts of operations on communities, including entering, operating, and exiting	78-83, 92-99		1 2	
Aspect: Corruption					
SO2	Percentage and total number of business units analysed for risks related to corruption	40,42			
SO3	Percentage of employees trained in organisation's anti-corruption policies and procedures	40, 43			
SO4	Actions taken in response to incidents of corruption	38			
Aspect: Public policy					
SO5	Public policy positions and participation in public policy development and lobbying	36-37, 40			
SO6	Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country	40			
Anti-competitive behaviour					
SO7	Total number of legal actions for anti-competitive behaviour, anti-trust, and monopoly practices and their outcomes				
Compliance					
SO8	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations	50, GRI table			Other than described in the report, the Family of Companies was not subject to any significant fines or non-monetary sanctions for non-compliance with laws and regulations in 2009.
Social performance: product responsibility indicators					
Aspect: Customer health and safety					
PR1	Life cycle stages in which health and safety impacts of products/services are assessed for improvement	n/a	n/a		Diamonds do not present any latent health and safety risks.
PR2	Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products/services	n/a	n/a		Diamonds do not present any latent health and safety risks.
Aspect: Products and services labelling					
PR3	Type of product and service information required by procedures and percentage of significant products and services subject to such information requirements	34, 37		1 2	
PR4	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labelling, by type of outcomes	37		1 2	

Performance indicators - GRI (G3) Sustainability Reporting Guidelines		Page reference	UN Extent mechanisms	Notes
PR5	Practices related to customer satisfaction, including results of surveys measuring customer satisfaction			
Aspect: Marketing communications				
PR6	Programmes for adherence to laws, standards and voluntary codes related to marketing communications	GRI table		De Beers worldwide advertising programmes are handled by J Walter Thompson (JWT). Significant care is taken by JWT to ensure all materials produced on behalf of De Beers are not misleading and are in compliance with applicable advertising rules and legislation. JWT also ensures such materials do not violate the intellectual property rights of third parties.
PR7	Number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications	GRI table		No incidents of non-compliance with regulations and voluntary codes concerning marketing communications were recorded in 2009.
Aspect: Customer privacy				
PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data	GRI table		No substantiated complaints regarding breaches of customer privacy and losses of customer data were recorded in 2009.
Aspect: Compliance				
PR9	Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services	GRI table		No significant fines for non-compliance with laws and regulations concerning the provision and use of products and services were recorded in 2009.

Performance indicators - GRI (G3) Sustainability Reporting Guidelines		Page reference	UN Extent	UN mechanisms	Notes
Performance indicators - Mining and Metals Sector Supplement (2010)					
MM1	Amount of land (owned or leased, and managed for production activities or extractive use) disturbed or rehabilitated.	82-83, 95, 98-99			
MM2	The number and percentage of total sites identified as requiring biodiversity management plans according to stated criteria, and the number (percentage) of those sites with plans in place.	94, 96			
MM3	Total amounts of overburden, rock, tailings, and sludges and their associated risks.	95, OFR			
MM4	Number of strikes and lock-outs exceeding one week's duration, by country.	50, GRI table			No strikes or lockouts exceeding one week's duration took place in 2009.
MM5	Total number of operations taking place in or adjacent to Indigenous Peoples' territories, and number and percentage of operations or sites where there are formal agreements with Indigenous Peoples' communities.	70, GRI table			The only operations that took place in or adjacent to Indigenous Peoples' territories were the Snap Lake and Victor mines in Canada.
MM6	Number and description of significant disputes relating to land use, customary rights of local communities and Indigenous Peoples.	71			
MM7	The extent to which grievance mechanisms were used to resolve disputes relating to land use, customary rights of local communities and Indigenous Peoples, and the outcomes.	71			
MM8	Number (and percentage) of company operating sites where artisanal and small-scale mining (ASM) takes place on, or adjacent to, the site; the associated risks and the actions taken to manage and mitigate these risks.	67			
MM9	Sites where resettlements took place, the number of households resettled in each, and how their livelihoods were affected in the process.	69, GRI table			No resettlement took place at any sites during the course of 2009.
MM10	Number and percentage of operations with closure plans.	79-81, 95			All mining operations have closure plans. These are at varying degrees of resolution dependant on the remaining life of mine. Exploration operations have EMPs that cover closure of the exploration sites.
MM11	Programmes and progress relating to materials stewardship.	55, 59, 95			

Performance indicators - GRI (G3) Sustainability Reporting Guidelines		Page reference	Extent	UN mechanisms	Notes
Performance indicators - Reporting Guidance on HIV/Aids					
Good governance					
Indicator 1	Describe the organisation's HIV/Aids policy	60-61, 74, 107		4-6	
Indicator 2	Describe the overall strategy for managing the HIV/Aids risk	60-64, 74		4-6	
Indicator 3	Describe preparedness and contingency planning in anticipation of expected impacts	60-64, GRI table		4-6	Given that the Family of Companies operates in hyper-endemic countries such as Botswana, Namibia and South Africa, the impacts of HIV and Aids are current rather than anticipated. The Family of Companies has a longstanding and comprehensive HIV and Aids management in place in order to address the impacts of the disease.
Indicator 4	Describe how your organisation monitors its progress and reports in terms of Indicators	60-64		4-6	
Indicator 5	Describe how the organisation involves stakeholders in the formulation of policy, strategy and implementation	60-64, 74		4-6	
Measurement, monitoring and evaluation					
Indicator 6	Indicate current and projected future HIV/Aids prevalence and incidence rates among relevant populations (workforce, service providers, communities, target consumers, direct suppliers)	60, 62, 64, 74			
Indicator 7	Report current HIV/Aids-associated costs and losses to the organisation				
Indicator 8	Indicate total assumed future HIV/Aids-associated costs /losses				
Workplace conditions and HIV/Aids management					
Indicator 9	Describe the workplace and workplace-related HIV/Aids programmes and interventions and the extent to which they maintain a workplace environment respectful of human and legal rights	60-64		4-6	
Indicator 10	Indicate total allocated budget dedicated to HIV/Aids programmes per annum	72		4-6	
Depth, quality and sustainability of programmes					
Indicator 11	Detail the organisation's Voluntary Counselling and Testing (VCT) programme	60-63		4-6	
Indicator 12	Describe other support and counselling programmes and measures	61		4-6	
Indicator 13	Describe the organisation's HIV/Aids education and training programmes	60		4-6	
Indicator 14	Describe the organisation's condom and femidom distribution programme	60		4-6	
Indicator 15	Describe the organisation's general health care and wellness provision for employees (and/or ex-employees) and their families with specific mention of STD-treatment for those Aids sick	61		4-6	
Indicator 16	Describe additional benefits and support for employees sick, dying or deceased from Aids-related conditions	61		4-6	

Figure 1a: EC6 - Preferential procurement spend

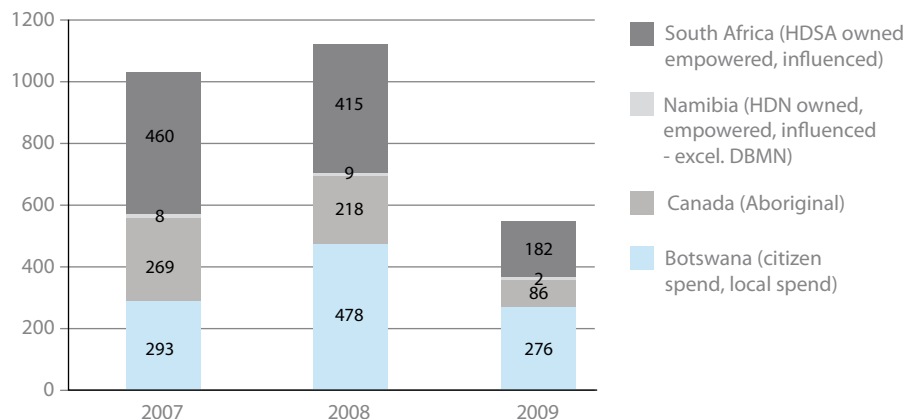


Figure 1b: EC6 - Preferential procurement spend

2009 total spend (US\$)	% preferential procurement
340,499,143	53.5%
327,939,194	84.1%
149,498,095	1.7%
242,288,456	35.5%
1,060,224,886	51.5%

Figure 2: EN1 - Materials used by weight or volume

Materials	2007	2008	2009
Hydrochloric Acid (litres)	573,435	168,957	148,602
Sulphuric Acid (litres)	11,655	27,539	17,250
Hydrofluoric Acid (litres)	65,889	69,004	50,650
Nitric Acid (litres)	49,822	43,257	13,053
Bromoform (litres)	9	607	0
Trichloroethylene (litres)	3	6	0
Sodium Hydroxide (litres)	4,812	7,720	1,978
Sodium Hydroxide (kilograms)	152,003	68,590	53,560

Figure 3: EN2 - Percentage of materials used that are recycled input materials

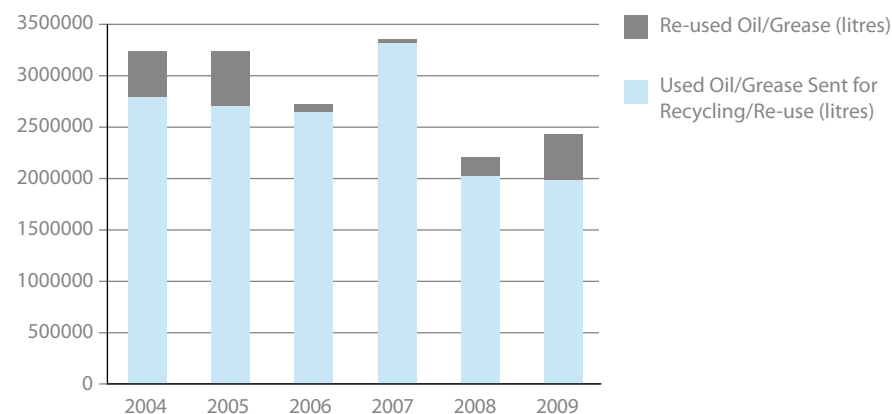


Figure 4: EN22 - Total weight of waste by type and disposal method

Waste Type	2007	2008	2009
Non-hazardous waste to land-fill (cubic meters)	158,421	49,505	79,549
Solid hazardous waste (cubic meters)	17,096	1,984	52,999
Liquid hazardous waste (litres)	186,969	311,048	537,066
Waste incinerated (cubic meters)	98,459	79,420	35,726
Cardboard/paper sent for recycling (tonnes)	2,294	236	2,738
Scrap metal sent for recycling (tonnes)	476,918	1,266,885	43,770
Cans sent for recycling (tonnes)	44	560	178
Earthmoving tyres sent for recycling (number)	18	260	264
Light vehicle tyres sent for recycling (number)	113	30	340
Conveyor belting sent for recycling (tonnes)	2,186	428	96
Drums sent for recycling/re-use (number)	4,798	4,402	2,814
Lead acid batteries sent for recycling/re-use (number)	1,057	3,407	1,475
Plastic sent for recycling/re-use (tonnes)	165	33	454
Toner/ink cartridges sent for recycling/re-use (number)	1,991	682	1,126
Electrical and electronic items sent for recycling/re-use (kilograms)	5,146	789	543
Used oil/grease sent for recycling/re-use (litres)	3,313,782	2,031,549	1,973,332
Re-used oil/grease (litres)	13,570	166,490	442,720
Contaminated water (litres)	1,252,943	260,809	1,203,808
Glass sent for recycling (tonnes)	23	99	13

Figure 5: LA12 - Percentage of employees receiving regular performance and career development reviews

Job Band/Grade	De Beers Canada	De Beers Consolidated Mines	Debswana	Namdeb
F-Band/Grade 8		100%	100%	100%
EU-Band/Grade 7	100%	100%	100%	100%
EL-Band/Grade 6	100%	100%	100%	100%
DU-Band/Grade 5	100%	100%	100%	100%
DL-Band/Grade 4	100%	100%	100%	100%
CU-Band/Grade 3	100%	92%	100%	100%
CL-Band/Grade 2	100%	88%	100%	100%
B-Band/Grade 1	100%		100%	100%
A-Band			100%	100%

Figure 6a: LA14 - Male and female salary ratios (by operation)

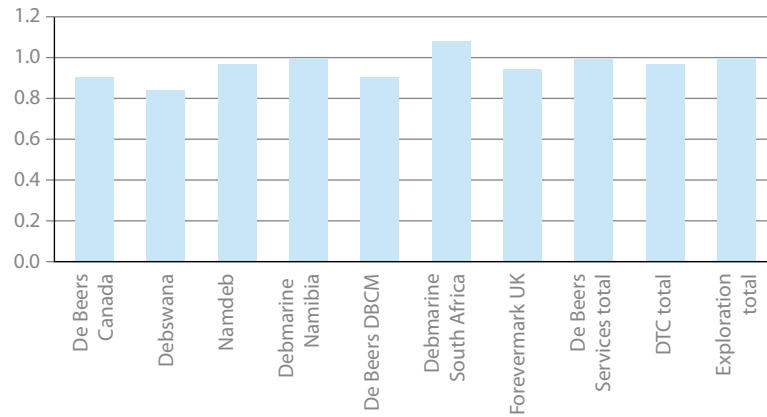


Figure 6b: LA14 - Male and female salary ratios (by grade)

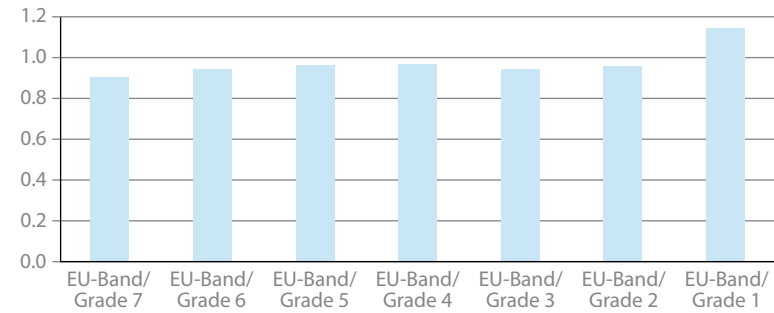


Figure 7a: LA13 - Workforce and management diversity: Historically Disadvantaged South Africans (HDSAs), Historically Disadvantaged Namibians (HDNs) and local Botswana citizens (%)

	DBCM (HDSA)	Namdeb (HDN)	Debswana (local)
Workforce	78.2	86.9	95.5
Management	41.0	49.6	81.3

Figure 7b: LA13 - Workforce and management diversity: women (%)

