DE BEERS GROUP

RESPONSIBLE AND ETHICAL SOURCING POLICY FOR DIAMONDS

This Responsible and Ethical Sourcing Policy is specific to the sourcing of natural rough and/or polished diamonds by De Beers Group Business Units.

BUILDING FOREVER ENHANCING TRANSPARENCY THROUGH DIAMOND PROVENANCE

Our Vision: We continue to work tirelessly to advance industry standards and enhance the transparency of diamond provenance

Version 2026

APPLICABILITY

This policy sets out the standards that each relevant De Beers Group business unit and all applicable suppliers of diamonds to De Beers Group entities must follow when sourcing natural rough and/or polished diamonds for either existing or new commercial initiatives. These are fair, consistent, and risk-based baseline requirements that must form part of the procurement decision-making process. All sourcing practices are aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Due Diligence Guidance).

MIDSTREAM

In the midstream, De Beers Group's businesses source rough diamonds for onward sale:

- Global Sightholder Sales (GSS), De Beers Consolidated Mines (DBCM) and Namibia Diamond Trading Company (NDTC) only sell rough diamonds that are sourced directly from De Beers Group owned or joint venture mines in Botswana, Canada, Namibia and South Africa ("DTC Diamonds").
- Auctions sells rough diamonds sourced (a) from De Beers Group owned or joint venture mines in Botswana, Canada, Namibia and South Africa ("DTC"); and (b) directly, or indirectly via the approved seller/broker, from third-party rough producers and sellers through the 'Third Party Supply' programme.
- GemFair sources diamonds directly from artisanal and small-scale mines that meet the requirements of the GemFair Responsible Artisanal and Small-Scale Mining Assurance Programme.

DOWNSTREAM

In the downstream, De Beers Group sources both rough and polished diamonds for its consumer brands:

- ORIGIN De Beers Group rough diamonds are sourced from its suppliers that originate from De Beers Group managed and joint venture mines in Botswana, Canada, Namibia and South Africa ("DTC Diamonds").
- Forevermark polished diamonds are sourced from its suppliers that originate from De Beers Group owned or joint venture mines in Botswana, Canada, Namibia and South Africa ("DTC").
- De Beers Jewellers (DBJ) rough and polished diamonds are sourced from its suppliers that that originate from (a) De Beers Group owned or joint venture mines in Botswana, Canada, Namibia and South Africa ("DTC"); and (b) third parties if DBJ is unable to source from De Beers Group mines as a first priority, via protocols that assess the supplier's ethical and product credentials.

As each De Beers Group business unit within the value chain has different commercial objectives and has different risks, this policy sets out different requirements designed to help mitigate those varying risks. However, the following are the Fundamental Principles for all De Beers Group entities sourcing diamonds.

FUNDAMENTAL PRINCIPLES FOR ALL DE BEERS GROUP ENTITIES SOURCING DIAMONDS

(applies to GemFair, GSS, NDTC, DBCM, Auctions, CCAP)

1. Applicable De Beers Group entities participate in and comply with all the requirements of the Best Practice Principles (BPP) programme, verified through third party audits annually. The BPP programme requirements consist of best practice Environment, Social and Governance standards, based on leading international frameworks, including the OECD Due Diligence Guidance, the UN Guiding Principles on Business and Human Rights, the International Finance Corporation's Performance Standards, International Labour Organisation (ILO) Standards, the United Nations Global Compact Principles and Universal Declaration of Human Rights. De Beers Group's performanceand compliance status against these requirements is reported annually and is publicly available here.

2. This policy is consistent with the requirements of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. It is designed to ensure that risk-based due diligence is undertaken for all sourcing activities to identify, mitigate and address the risks of sourcing from Conflict-Affected and/or High-Risk Areas. De Beers Group will not tolerate[1]:

    a. any forms of torture, cruel, inhuman and degrading treatment;
    b. any forms of forced or compulsory labour, which means work or service exacted from any person under the menace of penalty, and for which said person has not offered himself voluntarily;
    c. child labour;
    d. other gross human rights violations and abuses such as widespread sexual violence;
    e. war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide;
    f. any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of diamonds. 'Direct or indirect support' to non-state armed groups through the extraction, transport, trade, handling or export of diamonds includes, but is not limited to, procuring diamonds from, making payments to or otherwise providing logistical assistance or equipment to non-state armed groups or their affiliates who:
        i. illegally control mine sites or otherwise control transportation routes, points where diamonds are traded and upstream actors in the supply chain; and/or
        ii. illegally tax or extort money or diamonds at points of access to mine sites, along transportation routes or at points where diamonds are traded; and/or
        iii. illegally tax or extort intermediaries, export companies or international traders.
    g. all forms of bribery, including bribery to misrepresent taxes, fees and royalties paid to governments for the purposes of diamond extraction, trade, handling, transport and export;

1 OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas – Third Edition https://www.oecd.org/en/publications/oecd-due-diligence-guidance-for-responsible-supply-chains-of-minerals-from-conflict-affected-and-high-risk-areas_9789264252479-en.html

h. money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of minerals derived from the illegal taxation or extortion of diamonds at points of access to mine sites, along transportation routes or at points where diamonds are traded;

i. fraudulent misrepresentation of the origin of diamonds.

j. violations of applicable national or international sanctions and import/ export controls.

3. All De Beers Group entities, apart from GemFair, sourcing rough and/or polished diamonds, purchase (as a first priority) diamonds produced by De Beers Group through its owned or joint venture mines in Botswana, Canada, Namibia and South Africa ("DTC").

   a. Where it is not possible to source rough and/or polished diamonds from DTC, all diamond purchases must demonstrably be sourced from De Beers Group's Approved Producer List, and/or in accordance with the De Beers Group diamond sourcing protocol requirements for exceptional diamond purchases.

4. GemFair diamonds must be sourced in accordance with the GemFair Responsible Artisanal and Small-Scale Mining Assurance Programme.

5. Where a supplier has breached any of its commitments under this policy, De Beers Group reserves its right to suspend its relationship with the supplier and will seek to work with the supplier to ensure a sustainable corrective action plan has been implemented prior to recommencement of purchases. In the absence of a sufficient and evidence-based rectification of the issue identified, De Beers Group reserves its right to terminate its relationship with the supplier.

6. De Beers Group is audited by a third-party verifier, SGS, to ensure that its commitments referred to in this policy are being followed by all its relevant businessunits, via the BPP programme on an annual basis, and via the RJC Code of Practices certification every three years. SGS annually provides an update on De Beers Group's performance against the BPP audit programme, here.

7. De Beers Group commits to reporting on its due diligence practices and outcomes annually, via its sustainability report.

8. Grievance Mechanisms: De Beers Group commits to responding to all queries and concerns pertaining to its sourcing practices, directly via 'contact us' options (telephone, email, chat) on www. debeersgroup.com, www.debeers.com and https://www.forevermark.com/en and through all owned social media channels, as well as through any of our owned stores. We endeavor to provide full, accurate and complete responses to all sourcing-related queries. Concerns or incidents relating to De Beers Group sourcing practices can be raised (anonymously, if that is the preference) via the confidential whistleblowing service, YourVoice, and all queries, incidents and concerns will be appropriately investigated.

9. De Beers Group entities and their employees are required to comply with all relevant policies, including De Beers Group's Code of Conduct and Business Integrity Policy

10. .Due diligence and anti-money laundering checks: Related key individuals (including board members and directors with management/decision-making control) and their entities directly supplying De Beers Group, must not (a) have been convicted of any crime in any jurisdiction within a specified timeframe or (b) be listed on a sanctions list at any time during De Beers Group's engagement with the entity. Criminal activities can include, and are not limited to, corruption, fraud, tax evasion, money laundering, financing of terrorism, breaches of sanctions and import/export controls, fraudulent behavior and human rights abuses.

11. De Beers Group entities are committed to working to elevate the responsible business practices of their suppliers and offer training, expertise, tools and guidance developed to support the evolution of environmental, social and governance best practice across the diamond value chain.

12. All De Beers Group entities must ensure that they comply with the Fundamental Principles in support of the application of a consistent approach to sourcing at all times. Where issues pertaining to these Fundamental Principles are identified, these are assessed on a case-by-case basis. Ultimate decisions are made by the Business, Ethics, Risks and Conduct (BERC) Committee.

13. All De Beers Group entities must ensure they comply with all applicable Sanctions and Sanctions Lists, issued by any relevant Sanctions Authority, including when sourcing diamonds, either directly or indirectly. Where more than one Sanctions List or Sanctions restriction applies, De Beers Group will follow all of the applicable Sanctions Lists, and the highest and most stringent Sanctions requirements.

SUPPLIER FUNDAMENTAL PRINCIPLES

(applicable to all suppliers of diamonds to De Beers Group entities)

1. All entities and their relevant contractors supplying De Beers Group must commit to complying with the Best Practice Principles (BPP) and/or be certified against the Responsible Jewellery Council (RJC) Code of Practices. At a minimum, all entities, and their relevant contractors, supplying De Beers Group entities must not be found in violation of any of the nine material breaches in the Best Practice Principles Programme, namely:

    a. the use of child labour or forced labour;
    b. trade in conflict diamonds;
    c. money laundering or the financing of terrorism;
    d. wilful or negligent acts or omissions resulting in serious injury or death;
    e. adverse impact on human rights;
    f. non-payment of minimum wages;
    g. causing a significant adverse effect to the environment (such as negative impacts that last years or permanent impacts that are irreversible);
    h. non-disclosure of synthetic diamonds, treated diamonds or diamond simulants;
    i. otherwise bringing the industry into disrepute.

    Where a violation of any of the nine material breaches is identified, De Beers Group reserves the right to suspend its relationship with the supplier and will seek to work with the supplier to ensure asustainable corrective action plan has been implemented, prior to recommencement of purchases. In the absence of a sufficient and evidence-based rectification of the issue, De Beers Group reserves its right to terminate its relationship with the supplier.

2. All diamond suppliers must adhere to the requirements of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and have robust sourcing policies in place.

3. As a minimum, each rough diamond or diamond parcel supplied to any De Beers Group entity must be accompanied by a legitimate Kimberley Process certificate.

4. All entities supplying rough and/or polished diamonds to any De Beers Group entity must comply with the World Diamond Council System of Warranties.

5. All entities supplying De Beers Group must meet all applicable legal requirements.

6. All entities supplying rough and/or polished diamonds to De Beers Group must ensure they comply with all applicable Sanctions and Sanctions Lists, issued by any relevant Sanctions Authority, including when sourcing rough or polished diamonds, either directly or indirectly, for De Beers Group entities. Where more than one Sanctions List or Sanctions restriction applies, De Beers Group will follow all of the applicable Sanctions Lists, and the highest and most stringent Sanctions requirements.

7. All suppliers must implement policies and due diligence procedures that provide reasonable assurance to De Beers Group that all diamonds supplied meet De Beers Group's Fundamental Principles and BPP requirements.

8. Where issues pertaining to these Fundamental Principles are identified, these are assessed on a case-by-case basis. Ultimate decisions are made by the De Beers Group BERC Committee (BERC Co) and with at least one executive present from the relevant business unit's Executive Management team.

9. All suppliers must ensure they comply with all applicable Sanctions, including any UN, EU, US, UK, or any other relevant economic and/or trade Sanctions Lists, and do not cause any person to violate any UN, EU, US, UK or any other relevant Sanctions. Where more than one Sanctions List applies, De Beers Group will follow all of the applicable Sanctions Lists, and the highest and most stringent Sanctions requirements. Breach of any applicable Sanctions will lead to immediate termination of supplier status.

All De Beers Group entities must inform the Best Practice Principles/Ethical and Sustainable Value Chains team of any proposed new diamond sourcing or changes to existing diamond sourcing procedures, which includes proposed changes to business models and pilot initiatives.

This policy is applicable to any pilot initiatives involving any diamond sourcing.

De Beers Group continues to commit to spearhead opportunities to raise industry and sector ethical standards wherever possible, through its dealings with new business partners as it progresses its commercial strategies.

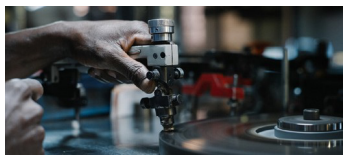
THE BPP REQUIREMENTS CONSIST OF THE FOLLOWING SECTIONS

BUSINESS RESPONSIBILITIES



- Ethical Standards
- Commitment
- Business Integrity
- Financial Offences
- Kimberley Process and System of Warranties
- Sourcing from Conflict-Affected and High-Risk Areas Product Security
- Disclosure
- Melee Assurance Protocol
- Supply Chain Management/ Best Endeavours
- Provenance Claims
- Claims
- Grading and Appraisal

SOCIAL RESPONSIBILITIES



- Employment
- Health and Safety
- Respectful Employment Practices, Inclusivity and Disciplinary Procedures Child Labour
- Forced Labour
- Human Rights
- Direct Sourcing from Artisanal and Small-Scale Mining

ENVIRONMENTAL RESPONSIBILITIES



- Best Environmental Practice and Regulatory Framework
- Carbon Footprinting and Targets

SOCIAL INVESTMENT AND BUSINESS IMPACT



- Other Environmental Commitments
- Measuring Progress Against Oher Environmental Commitments
- Social Initiatives
- The Global Goals for Sustainable Development

GOLD, PLATINUM, SILVER, COLOURED STONES



- Responsible sourcing – gold, platinum, silver and coloured gemstones, where relevant.

MINING SUPPLEMENT



- Extractive Industries Transparency Initiative
- Impact Assessment
- Community Engagement and Development
- Community Health and Safety
- Biodiversity
- Natural Resource and Environmental Risk Management
- Mercury
- Indigenous Peoples
- Cultural Heritage
- Artisanal and Small-scale Mining
- Security Guards
- Mine Closure Planning
- Sustainability Reporting

SGS is the appointed third-party verifier of the BPP Programme and is a Full Member of APSCA (the Association of Social Compliance Auditors). All auditors used in the BPP verification audits meet the requirements set out in the APSCA Code and Standards of Professional Conduct.

GOVERNANCE AND IMPLEMENTATION

The implementation of this policy is overseen by the Business, Ethics, Risks and Conduct Committee (BERC Co). BERC Co is mandated to ensure the process of administering the BPP programme, the Pipeline Integrity programme and the implementation of the De Beers Group Responsible Sourcing Policies (meaning the De Beers Group Responsible and Ethical Sourcing Policy for Diamonds and De Beers Group Responsible Sourcing Policy for Precious Metals, Minerals and Other Gemstones) has sufficiently good governance and to ensure that any risks associated with the programmes are managed appropriately. As part of their remit, BERC Co are responsible for ensuring that the standards, requirements, approaches and methodologies continue to be fit for purpose.

BERC Co is mandated to investigate allegations and reports of non-compliance with the BPPs by any BPP auditable entity, and against both De Beers Group Responsible Sourcing Policies.

The policy is subject to review either annually or for any of the reasons outlined below, depending on what is sooner. The list of Approved Producers for Auctions and De Beers Jewellers is subject to periodic review. Changes that will trigger a review of this policy and/or the Approved Producers and Mines List (at any time) include, but are not limited to:

- material changes to De Beers Group strategies, business model and commercial initiatives;
- changes in the socio-political climate of producer countries;
- changes to legislation;
- updates and additions to Sanctions Lists or other Sanctions restrictions
- changes to mining companies' assets and/ or their environmental/ social/governance performance;
- any other issue that might bring the industry into disrepute.

APPROVED PRODUCER AND MINES LIST

Approved Producers and Mines for Auctions and De Beers Jewellers are selected based on the following baseline criteria, as a minimum:

- Identification of whether any applicable individuals or entities affiliated to the "Approved Producer" are listed on relevant economic and/or trade Sanctions Lists, included but not limited to UN, US, EU, and UK Sanctions Lists.
- country risk assessments relating to key issues such as transparency, human rights impacts, environmental impacts;
- mine region risk assessment relating to key issues such as transparency, human rights impacts, environmental impacts if different from country context;
- review of companies' websites, annual reports, financial reports and sustainability/ CSR reports (where available) to inform an in-depth understanding of the producers'and mines' environmental, social and governance (ESG) policies, procedures and performance;
- evidence that the producer/mine has not breached any of the Fundamental Principles defined above;
- due diligence undertaken on producer companies and their key individuals to identify red flags, including applicability of sanctions, financial strength, reputational issues (current and historic);
- the use of adverse media searches on the producers, with any findings further researched for robust verification.

To further inform the decision to include a producer/mine in the Approved Producer and Mines List, the following elements are verified as best practice:

- RJC Certification status;
- Evidence that the producer/mine creates positive social and economic development;
- Third-party publicly available reports on ESG performance and further verification of any claims/issues;
- Screening of producers and mining operations to verify shareholding information, and to identify and verify corporate information;

The Approved Producer and Mines List is governed by BERC Co which has the final sign-off for changes to the list.

In instances where producers/mines on the Approved Producer and Mines List are removed for failing to meet the baseline criteria required as a minimum, diamonds from these sources can no longer be purchased from the date of the BERC Co decision.

CONSISTENCY IN FUNDAMENTAL PRINCIPLES, APPROVED PRODUCER LIST, VARIATION IN BUSINESS UNIT OBJECTIVE(S) AND RISK PROFILE

All entities in De Beers Group that source diamonds, while meeting their own commercial objectives, must commit to and comply with the Fundamental Principles and this policy in full to ensure that there is consistency of approach.

DE BEERS GROUP – MIDSTREAM BUISNESS UNITS

AUCTIONS

Where Auctions wishes to source and sell rough diamonds that are not from DTC, Auctions will only source rough diamonds that have demonstrably been sourced from the De Beers Group Approved Producer and Mines List. Auctions must adhere to and demonstrate compliance with the Auctions Diamond Trading Standard for Sellers.

DIAMOND SOURCING FOR GEMFAIR

GemFair sources rough diamonds from artisanal and small-scale miners (ASM) and enables the traceability from mine to market through a tailored technological solution, while providing support and training to ASM producers to meet legal and best practice standards. Such diamonds are not considered DTC diamonds; however, these may be procured by CCAP for De Beers Jewellers in accordance with this policy.

DE BEERS GROUP – DOWNSTREAM BUISNESS UNITS

FOREVERMARK

- Provenance from DTC will be sought for all diamonds entering Forevermark.
- All suppliers of diamonds to Forevermark commit to meeting De Beers Group's Fundamental Principles for sourcing.
- All diamond suppliers to Forevermark, including those providing melee, are required to participate in and comply with both the Best Practice Principles (BPP) and Pipeline Integrity (PI) programmes, including the melee section where applicable.

DE BEERS JEWELLERS (DBJ)

- All suppliers of diamonds to DBJ commit to meeting De Beers Group's Fundamental Principles for sourcing.
- All suppliers of DTC diamonds to DBJ are required to participate in and comply with both BPP and Pipeline Integrity programmes.

- All core diamonds originate from DTC, sourced from suppliers who are compliant with the BPP and Pipeline Integrity programmes.

- Melee diamonds[3] originate from DTC and are sourced from suppliers who are compliant with the BPP and Pipeline Integrity programmes.

- All exceptional diamond purchases are undertaken in accordance with the Exceptional Diamond Sourcing Protocol which details:

    a. countries and/or regions which are not approved for sourcing based on due diligence checks, through frequent and ongoing review;
    b. strict supplier due diligence on the supplier's integrity, practices and sourcing policy;
    c. strict due diligence aligned with the OECD due diligence framework;
    d. clear definitions for recycled and legacy diamonds, aligned with the OECD due diligence framework and related assurance approaches to identify such diamond;.
    e. Requirements for when strategic suppliers must either participate in the BPP programme or certify against the RJC Code of Practices.

ORIGIN DE BEERS GROUP

- Provenance from DTC will be sought for all diamonds entering ORIGIN.

- All suppliers of diamonds to ORIGIN commit to meeting De Beers Group's Fundamental Principles for sourcing.

- All diamond suppliers to ORIGIN are required to participate in and comply with both the Best Practice Principles (BPP) and Pipeline Integrity (PI) programmes.

GLOSSARY

CONFLICT-AFFECTED AND HIGH-RISK AREAS (CAHRAS)	Areas identified by the presence of armed conflict, widespread violence, including violence generated by criminal networks, or other risks of serious and widespread harm to people. Armed conflict may take a variety of forms, such as conflict of international or non-international character, which may involve two or more states, or may consist of wars of liberation or insurgencies, civil wars, etc. High-risk areas are often characterised as areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure and widespread violence. Such areas are often characterised by widespread human rights abuses and violations of national or international law. A CAHRA can be a region, a country, an area within a country or an area that crosses one or more national boundaries. Operations are not necessarily complicit in conflict if they are located in a CAHRA. A high-risk activity is associated with extracting, trading, handling and exporting diamonds from conflict-affected and high-risk areas. It is possible to source from a CAHRA pending appropriate due diligence is implemented. Our guidance is taken from a number of sources which include, but is not limited to. the Responsible Jewellery Council guidance, the OECD Due Diligence Guidance, key non-governmental organisation reports, think tank reports and other trustworthy sources
CONFLICT DIAMONDS	Rough diamonds used by rebel movements or their allies to finance conflict aimed at undermining legitimate governments, as described by the UN Security Council (UNSC) and as recognised by the UN General Assembly (through resolution A/RES/55/56).
RED FLAG	A red flag is a warning or an indicator of a potential risk or problem (threat). In the context of due diligence, a red flag can be a location, supplier, or circumstance that triggers a need for enhanced due diligence, ie further investigation. When a red flag is identified, it is necessary to do further investigation on the matter.
SANCTIONS	Sanctions means any Sanctions List and any other similar sanctions, regulations, statutes, prohibitions and official embargo measures that relate to the enforcement of economic and trade sanctions which are maintained, amended and imposed by any Sanctions Authority (each a Sanction)
SANCTIONS LISTS	Sanctions List means all applicable sanctions lists maintained by any of the competent Sanctions Authorities as amended, supplemented, or substituted, including but not limited to OFAC's Specially Designated Nationals List, Sectoral Sanctions Identification List, and the Foreign Sanctions Evaders List; the Bureau of Industry and Security's ("BIS") Entity List, Unverified List, Denied Persons List, Military End-user List, and Military-Intelligence End User List; the Consolidated List of Financial Sanctions Targets issued by HMT, the UK Sanctions List, and the UK's list of persons named in relation to Russian financial and investment restrictions; the EU Consolidated list of persons, groups and entities subject to EU financial sanctions, and the EU's list of institutions named in Council Regulation (EU) No 833/2014 of 31 July 2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine

SANCTIONS AUTHORITY	Sanctions Authority means any of the United Nations (UN), the European Union (EU) and any of its Member States, the United Kingdom (UK), the United States (US), the Commonwealth of Australia, Switzerland, South Africa, and the respective governmental authorities of any of the foregoing (including, without limitation, the Office of Foreign Assets Control of the US Department of the Treasury (OFAC), the US Department of State, the Council of the European Union, the UK's Department for International Trade, and the Office of Financial Sanctions Implementation of Her Majesty's Treasury (HMT)), any other such authority with jurisdiction over De Beers Group's activities from time to time in any other territory, and any replacement of any of the foregoing or other regulatory body enforcing economic and trade sanctions legislation in such countries.
BEST PRACTICE PRINCIPLES (BPP)	De Beers Group's BPP standards, relating to business, social, human rights and environmental best practices. Further details are available here.
PIPELINE INTEGRITY	The segregation and traceability of eligible natural diamonds throughout the diamond chain of custody, from rough diamond purchase through cutting and polishing activities, including any assortment, until onward sale to a customer, in accordance with the Diamond Pipeline Integrity Standard.
RESPONSIBLE JEWELLERY COUNCIL (RJC)	RJC is a standard-setting organisation for the entire jewellery and watch industry. For more information, please see https://www.responsiblejewellery.com
DTC	DTC diamonds are diamonds that originated from (a) De Beers Group's managed and joint venture mines in Botswana, Canada, Namibia and South Africa, from mines that are certified against the Responsible Jewellery Council standards and are compliant with the De Beers Best Practice Principles; and (b) are sold by Approved Suppliers.
APPROVED SUPPLIERS	Means Global Sightholders Sales, De Beers Consolidated Mines, Namibia Diamond Trading Company and De Beers Group Auctions (where De Beers Group Auctions have sourced rough diamonds from De Beers' managed and joint venture mines in Botswana, Canada, Namibia and South Africa). Diamonds from DTC, for any De Beers Provenance Programme, must only be sourced from Approved Suppliers either directly, or from Indirect Suppliers
INDIRECT SUPPLIERS	Sightholder suppliers of rough diamonds that participate in at least one Pipeline Integrity/De Beers Provenance Programme that directly sourced eligible DTC Diamonds from Approved Suppliers, can evidence traceability and segregation of those diamonds up to the point of sale, and who provide clear provenance claim information on relevant documentation, as defined in the Diamond Pipeline Integrity Specification.
GLOBAL SIGHTHOLDER SALES (GSS)	De Beers Group's main rough diamond trading entity, based in Botswana, selling the vast majority of De Beers Group's aggregated rough diamond production mined from each of Botswana, Canada, Namibia and South Africa, sold primarily by way of term contract to Sightholders.

DE BEERS CONSOLIDATED MINES (DBCM)	De Beers Group's South African rough diamond trading entity, selling both aggregated and unaggregated rough diamond production mined from De Beers Group mines in each of Botswana, Canada, Namibia and South Africa, sold primarily by way of term contract to Sightholders.
NAMIBIA DIAMOND TRADING COMPANY (NDTC)	A 50:50 joint venture with the Government of Namibia for the sale in Namibia of aggregated rough diamond production mined from De Beers Group mines in each of Botswana, Canada, Namibia and South Africa and unaggregated rough diamond production from De Beers Group mines in Namibia, sold primarily by way of term contract to Sightholders.
AUCTIONS	De Beers Group's auctions-based trading entity which sells approximately 10 per cent of De Beers Group's rough diamond production by value via an auction platform to Registered Buyers ranging from diamond traders to manufacturers to retailers, to meet their sourcing needs based on their business requirements.
GEMFAIR	A De Beers Group business unit that creates a secure and transparent route to market for ethically sourced ASM diamonds through implementing a digital solution for mine sites that meet demonstrable ethical standards.
FOREVERMARK	A natural diamond jewellery brand focused on the fast-growing Indian market. Each Forevermark diamond receives the unique, Forevermark inscription, proof that it has been cared for along its journey.
DE BEERS JEWELLERS (DBJ)	A global diamond jewellery retailer, with 24 stores in 6 consumer markets around the world.
MIDSTREAM BUSINESS UNITS	Midstream business units comprise all De Beers Group's rough diamond trading business units that buy and sell rough diamonds. These are: • Global Sightholder Sales (GSS) • De Beers Consolidated Mines (DBCM) • Namibia Diamond Trading Company (NTDC) • Auctions • GemFair
DOWNSTREAM BUSINESS UNITS/INITIATIVES	Downstream business units comprise De Beers Group's diamond brands: ORIGIN De Beers Group, Forevermark and De Beers Jewellers.
FUNDAMENTAL PRINCIPLES	The principles, standards and requirements contained in this policy that are applicable to all De Beers Group entities that source diamonds.
SUPPLIER PRINCIPLES	The principles, standards and requirements contained in this policy that are applicable to all external suppliers of diamonds to De Beers Group entities.

De Beers Group