De Beers Group

RESPONSIBLE SOURCING POLICY

For precious metals minerals
and gemstones (excluding diamonds)
for use in jewellery products

Version 2026

APPLICABILITY

This Responsible Sourcing Policy relates to the sourcing of precious metals, minerals and gemstones (excluding diamonds) for use in jewellery products. This Policy includes references to industry guidance and standards, and specific compliance requirements relating to the sourcing of products within its scope. This Policy is not applicable to the sourcing of diamonds, for which a separate, but fully aligned, policy (the De Beers Group Responsible and Ethical Sourcing Policy for Diamonds) is available, as diamonds are the core business of De Beers Group.

De Beers Group does not source any rubies, sapphires and emeralds in any part of its business and therefore these are out of scope for the purpose of this Policy.

Fundamental Principles

The following Fundamental Principles for all De Beers Group entities sourcing diamonds also apply to the sourcing of all precious metals, minerals and gemstones (excluding diamonds) for use in jewellery products, and specifically the requirements of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and the Supplement on Gold.

Scope of this Policy:
De Beers Group sources precious metals, minerals and gemstones (excluding diamonds) for use in jewellery products sold by its downstream consumer brands, Forevermark (FM) and De Beers Jewellers (DBJ), known as "De Beers Group Entities". These materials are sourced via jewellery manufacturers that are contracted by FM and DBJ to manufacture jewellery for each of these brands. These jewellery manufacturers source the materials from third-party sources such as refiners or wholesale mineral suppliers. Therefore, this Policy is applicable to all suppliers of these jewellery manufacturing services and their relevant subsidiary, affiliate, parent, associate and joint venture operations, as well as any of their relevant sub-contractors.

Building Forever – This policy is part of our broader sustainability commitments within the Building Forever framework and reflects our dedication to responsible sourcing and transparency.

To support our vision to advance industry standards, we are committed to ensuring that suppliers of the component minerals used in our jewellery, comprising precious metals, minerals and gemstones (excluding diamonds), also meet strict Environmental, Social and Governance standards across their value chains.

This Policy sets out the principles that FM and DBJ must consider when sourcing precious metals, minerals and gemstones (excluding diamonds) for use in their jewellery products for existing or new commercial initiatives. These are baseline criteria that form part of a decision-making process that is **fair, consistent, and risk-based**. Risk assessments should consider both the supplier and source, as well as the risk and opportunity of the commercial activity to be undertaken by De Beers Group against the value it derives. 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).

The following are the Fundamental Principles for all De Beers Group entities sourcing precious metals, minerals and gemstones (excluding diamonds) for use in jewellery products.

Fundamental Principles for All De Beers Group Entities Sourcing Precious Metals, Minerals and Gemstones (excluding diamonds) for use in Jewellery Products (Applies to Forevermark and De Beers Jewellers):

1. These Fundamental Principles are aligned with the Fundamental Principles stipulated in the De Beers Group Responsible and Ethical Sourcing Policy for Diamonds.
2. This Policy is consistent with the requirements of the OECD Due Diligence Guidance. 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 high-risk areas. In accordance with the OECD Due Diligence Guidance, 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 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 precious metals and/or minerals and/or gemstones. "Direct or indirect support" to non-state armed groups through the extraction, transport, trade, handling or export of precious metals and/or minerals and/or gemstones includes but is not limited to, procuring precious metals and/or minerals and/or gemstones 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 precious metals and/or minerals and/or gemstones are traded and/or refined and upstream actors in the supply chain; and/or
        ii. illegally tax or extort money or precious metals and/or minerals and/or gemstones at points of access to mine sites, along transportation routes or at points where precious metals and/or minerals and/or gemstones 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 precious metals and/or minerals extraction and/or gemstones, trade, handling, transport and export;
    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 precious metals and/or minerals and/or gemstones at points of access to mine sites, along transportation routes or at points where precious metals and/or minerals are traded;
    i. Fraudulent misrepresentation of the origin of precious metals and/or minerals and/or gemstones.
    j. Violations of national or international sanctions and import/export controls
3. 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 for Responsible Sourcing, the UN Guiding Principles, 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 performance and compliance status against these requirements is reported annually and is publicly available here.

[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

4. Where a Jewellery Manufacturing Contractor has breached any of its commitments under this Policy, De Beers Group reserves the right to suspend its relationship with the contractor and will seek to work with the contractor 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 the right to terminate its relationship with the contractor.
5. De Beers Group will be audited by a third-party verifier, SGS, to ensure that its Policy commitments are being upheld across all its relevant business units, via the BPP Programme on an annual basis, and via the Responsible Jewellery Council (RJC) Code of Practices certification every three years. SGS annually provides an update on De Beers Group's performance against the BPP Programme, here.
6. De Beers Group commits to reporting on its due diligence practices and outcomes annually, via its sustainability report.
7. 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 www.forevermark.com or through all social media channels. Our commitment is to provide full, accurate and complete responses to all queries. Anonymous concerns or incidents can be raised via the confidential whistleblowing service, YourVoice, and all queries, incidents and concerns will be appropriately investigated.
8. De Beers Group entities and their employees are required to comply with all relevant policies, including the De Beers Group Business Integrity Policy and the De Beers Group Code of Conduct.
9. Due Diligence/Anti-Money Laundering checks: Entities directly supplying or manufacturing for De Beers Group and their related key individuals (including board members and directors with management/decision-making control) and their entities directly supplying De Beers Group, must not have been convicted of any crime in any jurisdiction since 2014 or 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.
10. De Beers Group is committed to working to elevate the responsible business practices of its suppliers and contractors and offers training, expertise, tools and guidance developed to support the evolution of environmental, social and governance best practice across the precious metals and minerals value chain.
11. All De Beers Group entities must ensure that a consistent approach to sourcing is applied at all times.
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.
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 metals, minerals and/or gemstones, 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

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, Risk and Conduct Committee (BERC Co) and with at least one executive present from the relevant business unit/s' Executive Management team. More information is provided below on the mandate of BERC Co.

All De Beers Group entities must inform the Best Practice Principles/Ethical and Sustainable Value Chains team of any proposed new sourcing or changes to sourcing procedures or scope for precious metals, minerals and gemstones (excluding diamonds), which includes proposed changes to business models and new initiatives being tested.

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.

Fundamental Principles for Jewellery Manufacturing Contractors Supplying Precious Metals, Minerals and Gemstones (excluding diamonds) for Use in Jewellery Products to De Beers Group Entities:

1. All Jewellery Manufacturing Contractor entities (and their relevant contractors) supplying De Beers Group with services and component products must comply with the BPP Programme requirements and/or be certified against the RJC Code of Practices. The BPP Programme requirements consist of best practice Environment, Social and Governance standards, based on leading international frameworks, including the OECD Due Diligence Guidance for Responsible Sourcing, the UN Guiding Principles, the International Finance Corporation's Performance Standards, International Labour Organisation (ILO) Standards, the United Nations Global Compact Principles and Universal Declaration of Human Rights.

   At a minimum, all Jewellery Manufacturing Contractor entities, and their relevant contractors, supplying De Beers Group must not be found to be in violation of any of the relevant material breaches in the BPP programme as follows:

   a. The use of child labour or forced labour;
   b. Trade in conflict minerals;
   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. Otherwise bringing the industry into disrepute.

2. Where a violation of any of these material breaches is identified, De Beers Group reserves the right to suspend its relationship with the Jewellery Manufacturing Contractor and will seek to work with the Jewellery Manufacturing Contractor 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, De Beers Group will permanently terminate its relationship with the contractor.

3. All entities supplying De Beers Group with services and/or component products must meet all applicable legal requirements.

4. All Jewellery Manufacturing Contractors and their entities must ensure they comply with all applicable Sanctions and Sanctions Lists, issued by any relevant Sanctions Authority, including when sourcing metals, minerals and/or gemstones, 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

5. All Jewellery Manufacturing Contractors supplying De Beers Group entities with metals, minerals and/or gemstones must comply with the terms of this Policy and ensure that they are only sourcing from approved sources as specified under the terms of this Policy. Changes to approved sources will be duly notified and appropriate time periods for implementation will be considered.

6. As a general rule and at minimum, all Jewellery Manufacturing Contractors 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 for precious metals, specifically the Supplement on Gold, and have robust sourcing policies in place. This includes:

a. **Strong Management Systems:**

Jewellery Manufacturing Contractors must:

i. Establish a risk-based sourcing policy for metals, minerals and gemstones and communicate its requirements appropriately to their relevant suppliers.
ii. Implement appropriately robust Know Your Counterparty principles to establish the identity of all organisations with which they engage and to inform themselves of counterparty risk profiles based on business relationship, jurisdiction, material, context etc.
iii. Implement appropriate documentation systems to ensure terms of business are defined, transaction documents, invoices, memos, delivery notes and product certificates are received, reviewed and stored appropriately.
iv. Establish an appropriate grievance mechanism.

b. **Identify and Assess Risk:**

Jewellery Manufacturing Contractors must:

i. Undertake appropriate risk-based due diligence to map and analyse their supply chains (including know your counterparty processes to identify all suppliers and the provenance of materials sourced).
ii. Undertake appropriate due diligence on all sources of all precious metals, minerals and gemstones, irrespective of the scale of the quantity of the material sourced, to identify and categorise the risks in their supply chain and determine a process to identify any red flags and, where necessary, an appropriate process to address them.

c. **Risk Management and Enhanced Due Diligence:**

Jewellery Manufacturing Contractors must:

i. Establish a procedure to assess the possibility of adverse impacts and the potential of sourcing from high-risk or conflict-affected areas and define and implement a strategy to mitigate or eliminate such risks, including undertaking enhanced due diligence.
ii. Ensure its strategy for mitigation and elimination of risks defines the criteria for when trade would be continued, suspended temporarily or terminated, and ensure that these criteria are consistently applied.
iii. Continue to monitor and evolve risk management performance.
iv. Inform De Beers Group where impacts identified are determined to, or may potentially be, high-risk and/or when the terms of this Policy are breached.
v. Carry out third-party verification which supports enhanced due diligence requirements where required.

d. **Reporting**

i. Jewellery Manufacturing Contractors must provide to De Beers Group timely, accurate and complete reporting on sourcing practices and data, including product information on specific orders and materials sourced on behalf of De Beers Group.
ii. Jewellery Manufacturing Contractors must adequately, and where applicable, publicly report on their sourcing due diligence practices.
iii. Jewellery Manufacturing Contractors must ensure that the products containing any materials supplied to them through the Jewellery Manufacturing Contractors' supply chain are correctly and accurately represented, including providing certificates where applicable (e.g. gold purity/assay certificates).
iv. Jewellery Manufacturing Contractors must follow the definitions of minerals as specified in the CIBJO/World Jewellery Confederation Blue Books.

7. All Jewellery Manufacturing Contractors must implement policies and due diligence procedures that provide reasonable third-party assurance to De Beers Group that all precious metals, minerals and gemstones (excluding diamonds) supplied meet De Beers' Fundamental Principles and fulfil the requirements in this Policy.

8. All Jewellery Manufacturing Contractors must provide De Beers Group with applicable Know Your Counterparty information and documentation to meet De Beers Group's Anti-Money Laundering requirements.

Governance and Implementation:

The implementation of this Policy is overseen by BERC Co. BERC Co is mandated to ensure the process of administering the BPP programme, the Pipeline Integrity programme, to ensure the implementation of the Responsible Sourcing Policies has sufficiently good governance and to ensure that any risks associated with the programmes are managed appropriately. As part of its remit, BERC Co is responsible for ensuring that the standards, requirements, approaches and methodologies continue to be fit for purpose.

BERC Co is mandated to is investigate allegations and reports of non-compliance with the Best Practice Principles by any BPP auditable entity, and against both De Beers Group's Responsible Sourcing Policies (De Beers Responsible and Ethical Sourcing Policy for Diamonds and De Beers Responsible Sourcing Policy for Precious Metals, Minerals and Gemstones).

The Policy is subject to regular and ongoing reviews. Changes that will trigger a review of this Policy include, but are not limited to:

- Changes to commercial initiatives and objectives.
- Changes to best practice guidance on responsible sourcing.
- Changes to legislation.
- Updates and additions to Sanctions Lists or other Sanctions restrictions.
- Any other issue that might bring the business into disrepute.

The Policy is subject to review either annually or for any of the reasons outlined above, depending on what is sooner.

COMPLIANCE REQUIREMENTS SPECIFICALLY FOR SOURCING PRECIOUS METALS:

The Compliance Requirements in this Policy specifically for sourcing precious metals apply to all products containing precious metals, specifically gold, silver, and platinum group metals (platinum, ruthenium, rhodium, palladium, osmium and iridium).

Jewellery Manufacturing Contractors are required to ensure that all precious metals are sourced from the approved standards listed in these Compliance Requirements. Jewellery Manufacturing Contractors must ensure that the precious metals have been refined by certified refineries as specified in the Compliance Requirements below (e.g. gold from LBMA "Good Delivery List" refineries).

Jewellery Manufacturing Contractors are required to retain invoices, product certificates (e.g. for bullion bars, casting grain) and delivery notes referencing such certificates as core evidence of compliance with the Policy, wherever applicable and should be made available to De Beers Group entities on request.

Jewellery Manufacturing Contractors are required to certify that the precious metal(s) supplied to De Beers Group fulfil(s) the Compliance Requirements, either by certification of all metal(s) manufactured and supplied, or, if this is not possible, by segregating manufacture and supply of metal(s) to De Beers Group from the manufacture and supply of metals to other customers (if relevant).

For the avoidance of doubt, precious metals, minerals and/or gemstones for use in jewellery products supplied to De Beers Group cannot be sourced directly or indirectly from any entity listed on a Sanctions List by a relevant Sanctions Authority or that is otherwise restricted by Sanctions, or from any place from which the procurement of precious metals is prohibited under Sanctions restrictions.

The Policy identifies the following approved sources of responsibly sourced and "conflict-free" precious metals.

1. Approved Refiners and Certification Standards/Initiatives

The Policy only accepts precious metals from any of the following refinery sources as follows:

a. Refiners that have sourced gold, platinum and/or silver from mines that are certified against:
   i. The Responsible Jewellery Council Code of Practices
   ii. The Initiative for Responsible Mining Assurance
b. Gold, platinum and silver refiners certified against the RJC "Chain of Custody Standard"
c. Refiners on the LBMA "Good Delivery" list for gold and silver
d. Refiners on the LPPM "Good Delivery" list for platinum group metals
e. Refiners listed on the Conformant Gold Refiners list under the Responsible Minerals Initiative
f. Refiners which are certified under initiatives supporting the development of artisanal and small-scale ("ASM") mining: these include:
   i. programmes which align to the "CRAFT code"
   ii. the "Fairtrade Gold Standard"
   iii. the "Fairmined Standard for Gold"

The approved certification standards for refiners will be reviewed and updated from time to time as new information or emerging initiatives come to light that meet this Policy's Fundamental Principles and sourcing criteria, or in instances where there is cause for concern that the initiatives to which we have committed may not meet our exacting criteria.

2. Banks and Financial Institutions

Jewellery Manufacturing Contractors may source precious metals from banks which independently audit and verify that all precious metals they are supplying to the Jewellery Manufacturing Contractor have been sourced in accordance with any of the approved precious metals sourcing standards.

3. Trading Companies - Precious Metals

Jewellery Manufacturing Contractors may source precious metals from precious metals trading companies which independently audit and verify that all precious metals they are supplying to the Jewellery Manufacturing Contractor have been sourced, either directly or indirectly in accordance with any of the approved precious metals sourcing standards. Where independent audits and verification are not possible, De Beers Group will review alternative documentation available on a case-by-case basis.

4. Suppliers of Recycled Precious Metals

Jewellery Manufacturing Contractors to De Beers Group may source recycled precious metals for use in products to be supplied to De Beers Group from:

a. Suppliers that
(i) adhere to independent and well-recognised standards that are aligned with OECD Due Diligence Guidance; and (ii) require third-party verification to evidence that the precious metal source is recycled, in accordance with our definition of recycled metal, such as contained within the RJC "Chain of Custody Standard".

b. Suppliers which can verify that the recycled precious metal has been sourced via refiners on the LBMA "Good Delivery" list for gold and silver and/or the LPPM "Good Delivery" list for platinum group metals, for the reporting year.

c. In certain instances, where it is not possible for suppliers to source recycled precious metals in accordance with criteria defined in 4.a. – 4.b. above, these will be reviewed on a case-by-case basis to ensure alignment and that minimum requirements defined in this Policy have been met.

For the avoidance of doubt, recycled precious metals for use in jewellery products supplied to De Beers Group cannot be sourced directly or indirectly from any entity listed on a Sanctions List by a relevant Sanctions Authority or that is otherwise restricted by Sanctions, or from any place from which the procurement of precious metals is prohibited under Sanctions restrictions. The Jewellery Manufacturing Contractor shall be required to demonstrate compliance with this requirement through providing appropriate evidence to De Beers Group.

5. Sourcing Legacy Precious Metals

Jewellery Manufacturing Contractors may source legacy metal from any refiner listed on the LBMA and LPPM "Good Delivery" Lists and/or RJC Chain of Custody Certified refiners, providing CoC product via relevant transfer documents, and/or the RMI Conformant Refiners List, for metals which have verifiable dates.

Verifiable dates should be verified through inspection of physical date stamps on products and/or inventory records. Full disclosure, as relevant, should be provided.

6. Sub-contractors and/or Suppliers of Component Parts or Finished Products and any other downstream supply chain participants

In the event that a Jewellery Manufacturing Contractor sources component parts or finished products from third-parties for use in diamond jewellery supplied to De Beers Group, those third parties must be required by the Jewellery Manufacturing Contractor to use their best endeavours to ensure that all precious metals they are procuring have been sourced in accordance with any of the approved precious metals sourcing standards.

7. Case-by-Case Exceptions

While the list of approved sources is comprehensive, it is not exhaustive, and other responsible sources and/or standards may be presented, particularly as new and innovative products and solutions relating to responsible sourcing, traceability and provenance are developed and where we may wish to explore these new initiatives through pilot programmes. In these instances, exceptions may be considered on a case-by-case basis, subject to rigorous ongoing due diligence. In all such cases, Jewellery Manufacturing Contractors will be expected to identify and certify the sources of precious metal(s) to the mine or refinery and validate why these sources should be determined as compliant with this Policy. All exceptions must be confirmed in advance and in writing by De Beers Group, and an independent audit of this validation may be required.

ASSURANCE TO DEMONSTRATE COMPLIANCE WITH THIS POLICY

Ethical Credentials of Jewellery Manufacturing Contractors:

- **BPP**: Jewellery Manufacturing Contractors committed to BPP participation will participate annually in the BPP programme, with the De Beers Group Ethical and Sustainable Value Chains Team having full visibility of the duration, scope and outcome of annual participation. Details of these will be publicly reported annually on via consolidated information through www.debeersgroup.com and our various publicly available reports.

and/or

- **RJC**: Jewellery Manufacturing Contractors committed to RJC certification will be duly listed on the RJC website, including the scope of entities covered within their group fully stipulated within their RJC certificate, in addition to key information such as duration of certificate.

Sourcing Credentials and Approach of Jewellery Manufacturing Contractor:

Assurance on ensuring that the sourcing requirements of this policy are abided by the Jewellery Manufacturing Contractors will be through a combination of third-party certification and receipt and review of key documentation per shipment/parcel supplied by the manufacturer.

COMPLIANCE REQUIREMENTS SPECIFICALLY FOR GEMSTONES (EXCLUDING DIAMONDS) AND OTHER METALS OR MINERALS

DBJ and DBFM jewellery products may contain gemstones such as lapis lazuli or agate, or other minerals, such as malachite, or other metals such as aluminium. These are used in very limited quantities; however, a defined risk-based due diligence per mineral/metal and/or gemstone will be undertaken. This due diligence will focus on macro-level due diligence for each material, including global supply chain mapping, deep-dive research into the key issues identified, as well as a micro-level views, including understanding the relevant parties involved in the supply chain, and conducting in-depth due diligence on direct and indirect suppliers, to verify whether the Fundamental Principles, as defined in this Policy, have been met. Subject to the risks identified, appropriate action will be identified as defined within the process framework.

GUIDANCE CRITERIA

General Background on Approved Precious Metal Standards for: Gold, Silver and Platinum Group Metals (Platinum, Ruthenium, Rhodium, Palladium, Osmium and Iridium):

1. **The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals** and the Supplement on Gold are core references for this Policy. All Jewellery Manufacturing Contractors should follow the OECD Due Diligence Guidance framework.
2. **RJC Certification and BPP programme:** All entities and their relevant contractors supplying De Beers Group with minerals other than diamonds must comply with the BPP programme and/or be certified against the RJC Code of Practices.
3. **The London Bullion Market Association (LBMA) and London Platinum and Palladium Market (LPPM) Responsible Sourcing Standards and Guidance –** all refiners listed on the LBMA and LPPM "Good Delivery" Lists must adhere to their respective standards and guidance for responsible sourcing as a minimum requirement and undergo third-party verification before listing.
4. **The Responsible Minerals Initiative Responsible Minerals Assurance Process -** For sourcing gold, this Policy recognises the Responsible Minerals Initiative (RMI) Responsible Minerals Assurance Process (RMAP) and the list of conformant gold smelters and refiners.
5. **Artisanal and Small-Scale Mining (ASM) Standards:** Where Jewellery Manufacturing Contractors are sourcing directly or indirectly from ASM, they should ensure that the precious metals have been sourced in accordance with either:
   a) Code of Risk-mitigation for Artisanal and Small-scale Mining engaging in Formal Trade "the CRAFT code" which is applicable to all materials in this policy, or
   b) The "Fairtrade Gold Standard", if sourcing ASM Gold, or
   c) The "Fairmined Standard for Gold", if sourcing ASM Gold.

GLOSSARY – DEFINITION OF TERMS:

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 materials 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.
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 (i.e. further investigation). When a red flag is identified, it is necessary to do further investigation on the matter.
BEST PRACTICE PRINCIPLES	De Beers Group's proprietary Best Practice Principles Programme. Further details are available here.
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
SANCTIONS LIST	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
RESPONSIBLE JEWELLERY COUNCIL (RJC)	The RJC is the world's leading standard-setting organisation for the entire jewellery and watch industry.
RESPONSIBLE JEWELLERY COUNCIL "CHAIN OF CUSTODY STANDARD" (RJC CoC)	The RJC CoC Standard defines an approach for companies to handle and trade gold, silver and platinum group metals in a way that is traceable and responsibly sourced. CoC certification is voluntary and complements certification against the RJC's Code of Practices (COP), which is mandatory for all RJC members.[2]
OECD DUE DILIGENCE GUIDANCE FOR RESPONSIBLE SUPPLY CHAINS FOR MINERALS FROM CONFLICT-AFFECTED AND HIGH-RISK AREAS	The OECD Due Diligence Guidance provides detailed recommendations to help companies respect human rights and avoid contributing to conflict through their mineral purchasing decisions and practices. This Guidance is for use by any company potentially sourcing minerals or metals from conflict-affected and high-risk areas.[3]
THE LONDON BULLION MARKET ASSOCIATION (LBMA)	LBMA is an independent precious metals authority which guarantees metal quality in the Loco London Market and ensures the ethical and transparent sourcing of metals (including gold, silver, platinum and palladium) by their members through its Responsible Sourcing Programme.[4]
LONDON PLATINUM AND PALLADIUM MARKET (LPPM)	The London Platinum and Palladium Market is an over-the-counter trading centre for platinum and palladium and a commodity trading association. Conforming to the LPPM Responsible Sourcing Guidance is a requirement for all refiners wishing to achieve and maintain their LPPM "Good Delivery" Accreditation. This is intended to assure investors and consumers that all LPPM "Good Delivery" metal is conflict-free due to compliance with an audited, conflict-free process.[5]

[2] RJC Member Certification - COC Responsible Jewellery Council

[3] OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas - OECD

[4] About Good Delivery | LBMA

[5] LPPM | The London/Zurich Good Delivery List

THE RESPONSIBLE MINERALS INITIATIVE (RMI)	The RMI provides tools and resources to help companies make sourcing decisions that improve regulatory compliance, and offers companies and their suppliers an independent, third-party audit that determines which smelters and refiners can be verified as having systems in place to responsibly source minerals in line with current global standards. The minerals targeted by the RMI are gold, cobalt, mica, tantalum, tin and tungsten.[6]
THE INITIATIVE FOR RESPONSIBLE MINING ASSURANCE (IRMA)	IRMA's Standard for Responsible Mining defines good practices for what responsible mining should look like at the industrial-scale. It provides the list of expectations that independent auditors will use as the benchmark for responsible mines.[7]
CODE OF RISK-MITIGATION FOR ASM ENGAGING IN FORMAL TRADE (CRAFT) CODE	The CRAFT Code helps both buyers and miners to assess and mitigate critical social and environmental risks in artisanal minerals supply chains.[8]
THE FAIRTRADE GOLD STANDARD	Fairtrade Gold is sourced exclusively from small-scale mines which meet the Fairtrade Gold Standard; an internationally recognised marker of best practice for workers' rights and environmental protection. Workers in Fairtrade certified gold mines receive a guaranteed Fairtrade Minimum Price for their product.[9]
THE FAIRMINED STANDARD FOR GOLD	Fairmined Gold is sourced exclusively from artisanal and small-scale miners which meet the Fairmined Standard for Gold Standard. The Standard ensures that Artisanal and Small-scale Mining (ASM) organisations meet world leading standards for responsible practices, delivering organisational and social development and environmental protection. These ASM organisations receive a guaranteed fair price for their gold.[10]
DE BEERS FOREVERMARK (DBFM)	A De Beers Group business unit that offers an inscription, grading, wholesale, branding services and diamond jewellery to diamantaires and retailers for eligible polished diamonds that are sold in retail outlets globally.[11]
DE BEERS JEWELLERS (DBJ)	A De Beers Group business unit that sells diamond jewellery to consumers.[12]
DOWNSTREAM BUSINESS UNITS	Downstream business units references De Beers Group's two diamond brands: Forevermark and De Beers Jewellers.

[6] RMAP Assessment Introduction (responsiblemineralsinitiative.org)
[7] Standard - IRMA - The Initiative for Responsible Mining Assurance
[8] 2018-07-31-CRAFT-Code-v-1.0-EN.pdf (craftmines.org)
[9] Standard: Gold - (fairtrade.net)
[10] What is Fairmined - Fairmined
[11] De Beers Forevermark Diamond Jewellery | Forevermark
[12] De Beers Jewellers | Iconic Diamond Jewellery | De Beers UK

FUNDAMENTAL PRINCIPLES	These principles are applicable to all De Beers Group entities sourcing diamonds.
SUPPLIER PRINCIPLES	These principles are applicable to all external suppliers of diamonds to De Beers Group entities.
LEGACY	In accordance with the definitions given in the LBMA Responsible Gold and Silver Guidance documents and the RJC CoC, we define legacy precious metals as metals that do not require a determination of origin if they have verifiable dates. For gold, the verifiable date must be prior to 1st January 2012.[13] For silver and platinum group metals, the verifiable date must be prior to 1st January 2018.[14]A verifiable date can be verified through inspection of physical date stamps on products and/or bank depository or inventory records.[15]
RECYCLED	In accordance with the definitions given in the LBMA Responsible Gold[16] and Silver[17] Guidance documents and the RJC CoC, we define recycled precious metals as previously refined precious metals (such as end-user, post-consumer materials, precious metal-bearing products, and scrap and waste metals and materials arising during product manufacturing) which have been returned to a refiner or other downstream intermediate processor to begin a new life cycle as 'recycled material'.[18]
PRECIOUS METALS	Precious Metals are platinum (Pt), gold (Au), palladium (Pd) and silver (Ag) in their pure state. In the Russian Federation and the U.S., precious metals include the platinum group metals, gold and silver.[19]
PLATINUM GROUP METALS	The platinum group metals include platinum, palladium, iridium, rhodium, ruthenium and osmium.[20]
GEMSTONES	Gemstones are materials which have been formed completely by nature without human interference. They encompass: - Minerals, e.g. aquamarine, emerald, garnet, opal, sapphire. - Natural glasses, e.g., obsidian. - Rocks, e.g., lapis lazuli, opal with matrix and turquoise with azurite and malachite. - Organic gem materials, e.g., amber and jet - Biogenic gem materials, e.g., pearl, coral and tortoise shell.[21] At the present time, De Beers Group does not source any rubies, sapphires and emeralds. Our Responsible and Ethical Diamond Sourcing Policy for Diamonds is available here.

[13] RGGV820181211.pdf (lbma.org.uk)
[14] LBMA Responsible Gold Guidance
[15] RJC-CoC-2017-V2-Standard-2-1.pdf (responsiblejewellery.com)
[16] RGGV820181211.pdf (lbma.org.uk)
[17] LBMA Responsible Gold Guidance
[18] RJC-CoC-2017-V2-Standard-2-1.pdf (responsiblejewellery.com)
[19] Microsoft Word - 20-05-24 Precious Metals Blue Book.docx (cibjo.org)
[20] Microsoft Word - 20-05-24 Precious Metals Blue Book.docx (cibjo.org)
[21] 20-12-22-Official-Gemstone-Book.pdf (cibjo.org)

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