

DE BEERS GROUP

# OUR CODE OF CONDUCT

*Our values in action*



---

# CONTENTS

## MAKING DECISIONS

---

<b>SAFETY, HEALTH AND THE ENVIRONMENT</b>	7	Safety
	8	Health
	9	Alcohol and drug use
	9	The environment

---

<b>WE TREAT PEOPLE WITH CARE AND RESPECT</b>	11	Labour and human rights
	12	Host communities
	13	Equality (diversity, inclusion and fair treatment)
	13	Harassment and bullying
	14	Personal information and privacy

---

<b>WE CONDUCT BUSINESS WITH INTEGRITY</b>	16	Bribery
	17	Gifts, entertainment and hospitality
	18	Conflicts of interest
	18	Fair competition
	19	Suppliers, customers and other business partners
	20	Money laundering and the financing of terrorism
	20	Sanctions and Trade controls
	21	Working with institutional stakeholders
	22	Tax

---

<b>WE PROTECT OUR PHYSICAL ASSETS, INFORMATION AND INTERESTS</b>	24	Security
	25	Information security and data protection
	26	Accuracy of data, information and records
	27	Use and protection of company property
	28	Communicating externally
	29	Insider dealing
	30	Intellectual property

---

<b>RESOURCES</b>	32	YourVoice
	34	Our values

---

For more information about our values and behaviours, go to page 34.

---

# A MESSAGE FROM OUR CHAIRMAN

## DEAR COLLEAGUES,

I am proud of our Code of Conduct, which makes it very clear 'what' we must all do and 'how' we must behave to protect each other and our reputation. It symbolises what we stand for.

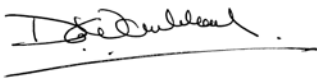
Our Code explains the boundaries within which we must work every day, and brings together in one place our material ethical principles and policies. It has at its core our shared Values, which describe how we must behave consistently to continue to earn the trust that gives us our licence to operate.

The ethical and moral decisions we make every day, by choosing to do the right things and delivering on our promises, are what build trust and demonstrate our Values in action. Our Code applies to everyone working for and with us, from our employees and contractors to our partners. Read it, understand it and follow it. We are personally and collectively accountable for the actions we take and must apply our judgment when deciding what to do and how to do it. One of our brand promises is to have the courage of our convictions. This empowers us all to make the right decisions. This includes putting safety first every time, behaving with integrity, and showing care and respect for each other.

The Code also serves as a reminder of the behaviour we can all ask of, and expect, from our colleagues, the values we should all exhibit, and the standards De Beers Group has committed to uphold in its interactions with key stakeholders such as the communities and governments in the countries where we operate. As such, I firmly believe the Code needs to have the same focus as safety and production. It is central to De Beers Group making a real difference, and to the pride we should all feel in contributing to that outcome.

You should keep coming back to the Code for direction and guidance if ever you are in any doubt about the right thing to do when faced with an ethical dilemma or legal concern. Equally, if you see or hear anything that is, or may be, contrary to our Values, this Code or the Group Policies that underpin it, speak up. No one is ever on their own. Your line manager should be the first person that you turn to in these situations, but we also have a service, YourVoice, that enables any employee, colleague or stakeholder to confidentially and anonymously report concerns relating to the integrity of any person's conduct.

By remaining true to our Values and complying with the Group Policies in this Code, you are demonstrating your commitment to creating sustainable value that lives up to our Purpose – to re-imagine mining to improve people's lives.



**Duncan Wanblad**  
Chairman, De Beers Group



---

# OUR ROLE AS THE WORLD'S LEADING DIAMOND COMPANY

De Beers Group is the world's leading diamond company, by value. We're involved in almost every stage of a diamond's journey: from the exploration, recovery, sorting, valuing and selling of rough diamonds, to the marketing and selling of polished diamond jewellery, and the development of synthetic diamond material.

Our diamonds bring beauty to the world. However, they do so much more through the impact they make on the people and places involved in their journey. This is why at De Beers Group, our purpose is to Make Life Brilliant.

To achieve our purpose, we have set ourselves an ambition, a goal to strive for. We cannot Make Life Brilliant doing the same things we've always done. Our surroundings are changing. We are both more and less connected than ever before. The people we care about - our colleagues, customers,

partners, community members and consumers - expect more of us and the rules we've always relied on are being rewritten.

Together, we work to unlock the value that the diamonds we recover represent. And through Building Forever - our blueprint for a better future - we're committed to creating a long term positive impact for people and the planet that will endure well beyond the discovery of our last diamond.

## OUR VALUES AND BEHAVIOURS

Our values define the way we behave and are the foundation for our Code. Together, they define our culture as an organisation and underpin our good reputation.

## SEVEN IMPORTANT THINGS TO KNOW ABOUT OUR CODE OF CONDUCT

**1** Our Code brings together the requirements for ethical business conduct that we all need to follow.

---

**2** Use this Code as a guide directing you to policies, standards and further information sources to help you when you have to make difficult choices about the right thing to do.

---

**3** Our Code applies to everyone across De Beers Group, including members of the Board of Directors. We all have a responsibility for upholding high standards, wherever we are and wherever we work.

---

**4** People will be held accountable for their behaviour at work and action will be taken where the Code has not been followed. Consequences will depend on how an individual has broken applicable policies and in what circumstances, and could range from a warning to dismissal.

**5** We expect our contractors, suppliers and agents, and industry associations of which we are a member, along with their employees, to work and act in a way that is consistent with our Code.

---

**6** We have operations in many countries, and those countries all have laws. Our employees are trusted to follow the laws that apply to them and to do the right thing, even when the law does not give specific guidance. When laws set standards that are different from our Code, we expect people to follow whichever sets the higher standard of behaviour.

---

**7** If you are a manager or leader, you have additional responsibilities. You must help your team members to understand and apply our Code, and to demonstrate our values in action through their behaviour. That means acting as a role model for your people by consistently demonstrating the right behaviours, and listening and responding to any questions or concerns raised.

For ease of reading we use generic language in describing the Group, and this is further explained at the end of this document.

# WHY IT MATTERS TO US ALL

## DEAR COLLEAGUES,

The De Beers Group Code of Conduct outlines our responsibilities to safeguarding both our own wellbeing and the company's reputation. It consolidates our ethical principles, policies and Best Practice Principles into one cohesive framework.

Central to this are our values, which serve as a compass in determining the right decisions to make for us to continue to act with integrity. By consistently making ethical and moral choices, honouring our commitments, and fostering trust with our colleagues, partners and the communities we serve, we can make these foundations of our business even stronger.

Each of us has a responsibility for our actions. Therefore, exercising sound judgment is paramount when faced with ethical dilemmas or legal concerns. Should uncertainty arise, I urge you to consult the Code of Conduct as a trusted resource. Additionally, if you encounter any behaviour that contradicts any aspect of it, or our values, I encourage you to report it – via your line manager, if possible, or through the confidential and anonymous YourVoice service, if not.

By upholding our values, adhering to the policies, and maintaining the standards outlined in the Code of Conduct, you demonstrate your commitment to ensuring our Purpose – to Make Life Brilliant – remains true for all.

Thank you.

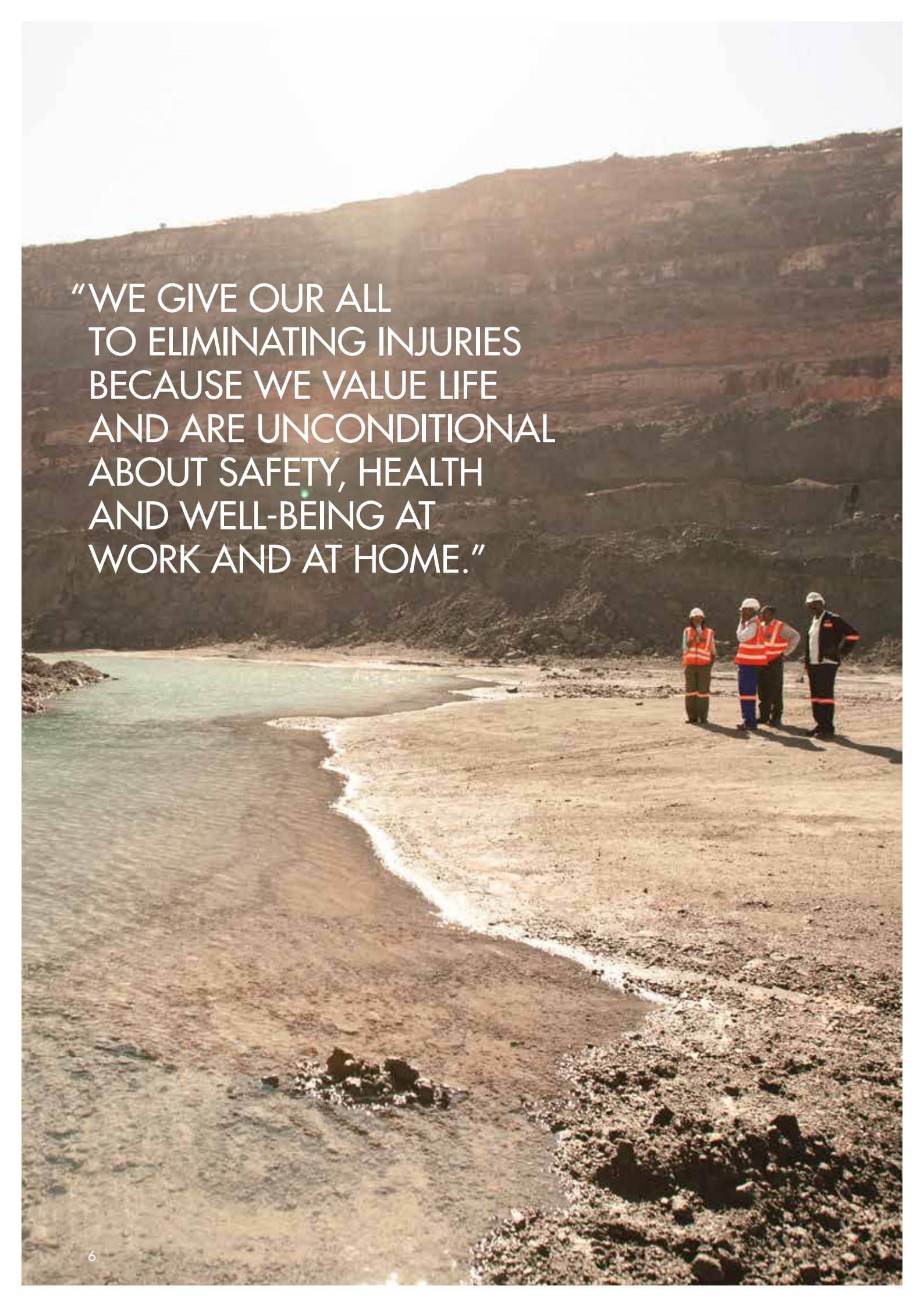


**Al Cook**

Chief Executive Officer, De Beers Group







"WE GIVE OUR ALL  
TO ELIMINATING INJURIES  
BECAUSE WE VALUE LIFE  
AND ARE UNCONDITIONAL  
ABOUT SAFETY, HEALTH  
AND WELL-BEING AT  
WORK AND AT HOME."



# SAFETY, HEALTH AND THE ENVIRONMENT

*We put safety first and believe that robust systems for the management of safety, health and the environment are a fundamental element of good management practice and essential for minimising our impact on the environment, creating a safe and productive place to work and for maintaining our licence to operate.*

## SAFETY

We believe that injuries and incidents are preventable and our value 'Put Safety First' puts this at the heart of everything we do. We are Pioneering Brilliance and striving to achieve 'beyond-zero' when it comes to risk competence and readiness to respond. Every one of us takes personal responsibility to maintain a safe and secure place of work. We strive to ensure that our operations are fundamentally safe, well designed and maintained by robust and effective management systems.

We rigorously comply with all applicable safety laws and regulations in addition to our own policies and requirements.

We ensure that all our staff, business partners and contractors are appropriately trained and are competent to manage their own safety, the safety of their colleagues, and that safety standards are consistently applied across our operations. We make sure that we learn from incidents to prevent recurrences, and we expect our consultants, agents, contractors and suppliers to be familiar with and follow our policies and requirements on safety.



### ALWAYS

- Put safety first.
- Look out for your fellow workers and report any potential safety issues with them or your line manager.
- Identify, assess and manage all risks associated with the activities you are involved in.
- Know the priority unwanted events in your area of work and ensure all the critical controls are in place and effective.
- Know and follow the safety requirements associated with the work you are doing, including the Personal Protective Equipment (PPE) you must wear.
- Deal with safety issues honestly and openly.
- Report all hazards, incidents, injuries or illness.
- Close out actions and apply learning from safety incidents.
- Stop work if you think it is unsafe.
- Know what to do in case of an emergency.
- Remain "unconditional" with respect to safety
- Identify hazards and access and manage risks



### NEVER

- Start work you are not qualified to perform
- Start work if you don't have the right equipment to do the work safely.
- Deviate from the work plan without a risk assessment and authority of your supervisor.
- Ignore a safety issue, however small it may seem.
- Turn a blind eye if safety controls are not in place, are not being followed or don't work.
- Assume someone else will report an incident, risk or concern; safety is everyone's personal responsibility.
- Ignore safety rules and standards.
- Ignore unsafe behaviours, acts or conditions.



### SAFETY

#### Resources:

Group Safety, Health and Environmental (SHE Policy)  
Life Saving Golden Rules  
Anglo American Technical Standards  
The Best Practice Principles and Assurance Programme  
Anglo American Travel Policy and Standard under Resources

#### Who can I speak to?

Line manager  
Safety representative





## HEALTH

### Resources:

Group Occupational Health Policy  
The Best Practice Principles and Assurance Programme  
Anglo American Safety, Health and Environment Way ("SHE Way")  
Group Safety, Health and Environmental (SHE Policy)  
Group Workplace Health Standards  
SSD PPE Specification

### Who can I speak to?

Line manager  
Occupational health representative

## HEALTH

Providing workplace environments that are free of occupational health risks is a legal and moral imperative for us and constitutes an investment in the productivity of our business. We must always put safety first.

All employees and contractors should return home fit and well at the end of each shift and remain so during the course of their working lives and in retirement. Our most important focus is on eliminating health hazards at their source. We believe that investing in wellness programmes that support healthy lifestyles and emotional resilience promotes employee engagement and productivity. We also endeavour to support employees who are managing long-term physical or psychological conditions.

We believe that contractors should benefit from the same health standards as employees. We comply with all applicable health laws and regulations in addition to our own policies and requirements.



## ALWAYS

- Proactively identify occupational health hazards and assess and manage risks, ensuring that the correct controls are in place when undertaking daily tasks
- Look out for your fellow workers and raise any potential health issues with your line manager.
- Ensure your health status and functional capacities are compatible with the work that you need to do, dealing with health and wellness issues honestly and openly.
- Report all occupational health hazards, workplace exposures, incidents, injuries and illnesses.
- Close out actions and apply learnings from health incidents.
- Stop work if you think it could result in excessive exposure to an occupational health risk.
- Take personal responsibility for your own health by wearing the necessary personal protective equipment (PPE) and adhering to mandated work processes.
- Take appropriate preventative measures for any infectious diseases prevalent in the area(s) where you are working.



## NEVER

- Start work which your health status and functional capacities are not compatible with.
- Ignore a health or wellness issue, however small it may seem.
- Turn a blind eye if a workplace environmental control is not in place, not being followed or it doesn't work.
- Assume someone else will report a occupational health risk or concern; health and wellness is everyone's personal responsibility.
- Fail to adhere to mandatory PPE requirements.





## ALCOHOL AND DRUG USE

Any employee, contractor or agency worker reporting to work must be free from the influence of alcohol, illegal drugs or any medication that may impair their ability to execute their duties safely. Consumption of alcohol on or close to company premises by all staff continuing to exercise their operational work duties is also strictly forbidden. We also prohibit the possession or consumption of illegal drugs at our work locations. We pursue a policy of educating our employees, undertaking testing, and providing support to those in need, in order to monitor that alcohol or illegal and unsafe drug use is not present in the workplace.



### ALWAYS

- Report to work fit and ready to carry out your tasks.
- Advise your supervisor or line manager if you have doubts about your fitness to work.
- Report situations where a work colleague is under the influence of alcohol or illegal drugs.
- Discuss with your line manager or Human Resources any situation where you suspect or know a colleague is taking prescription drugs which may impair their ability to work or otherwise pose a threat to safety.



### NEVER

- Turn up for work when you are under the influence of alcohol or illegal drugs.
- Consume alcohol during working hours on operational sites.
- Ignore substance abuse.
- Consume illegal drugs when at work on any premises.



### ALCOHOL AND DRUG USE

#### Resources:

Refer to local employee handbook or HR guidelines

#### Who can I speak to?

Line manager  
Human Resources representative  
Occupational Health representative

## THE ENVIRONMENT

We minimise our impact on the environment by integrating environmental considerations into core planning, covering the various life cycle of an operation, from exploration to beyond closure in our upstream operations as well as those across the midstream and downstream. Our partner communities cannot be healthy or thrive economically unless we work together to protect the natural world. We operate a sustainable approach to land management that includes continuous restoration and rehabilitation in partnership with local communities and follow best practice for water and biodiversity management, waste, air quality, emissions and mine closure.

Beyond this, we are focused on delivering transformative environmental performance through FutureSmart Mining™\* technology, the development of carbon neutral mines, halving our water footprint and protecting some of the world's most vulnerable species.

We are committed to adhering to legal requirements and Anglo American Group standards. We use natural resources, including water and energy, sparingly in recognition of the needs of others with

whom we share such resources, as well as the economic benefits to our business. We do not accept that mining should compromise the wellbeing of communities who depend on ecosystem services. Our aspiration is to create innovative partnerships that generate a range of positive outcomes for people and the environment.

We accept the role we must play in mitigating climate change, ensuring our business remains competitive in a carbon-constrained world, and safeguarding operations and host communities against the physical impacts of climate change.

We aim to have no net loss of significant biodiversity through responsible planning and stewardship of biodiversity, from exploration through to the closure of operations, and by making a contribution to biodiversity conservation in the regions in which we operate, aiming to achieve Net Positive Impact (NPI) by 2030. We respect legally designated Protected Areas and key biodiversity areas and commit to not exploring or mining within World Heritage Site Core Areas.



### THE ENVIRONMENT

#### Resources:

Group Safety, Health and Environmental (SHE Policy)  
The Best Practice Principles and Assurance Programme  
Building Forever Framework  
Anglo American Climate Change Policy  
Anglo American Water Policy

#### Who can I speak to?

Line manager  
Environmental representative



### ALWAYS

- Understand the impact of your work on the environment (i.e. emissions, water, waste, nature, noise) and look for ways to minimise the impact as much as possible.
- Use risk assessment processes to identify any hazards to the environment when undertaking your work and ensure appropriate actions are taken to prevent or mitigate identified risks.
- Report any incidents or potential incidents that have or could impact the environment or any of its components (water, air, land, ecology).



### NEVER

- Ignore a potential or actual environmental incident.
- Undertake work without the necessary environmental permits or authorisations.

A top-down view of a jeweler's workspace. The jeweler, wearing a light pink shirt, is seated at a workbench, their hands visible as they work with a small tool. The workbench is covered with a white cloth and features several small piles of gemstones in various shades of grey, white, and yellow. Each pile is accompanied by a small, handwritten label. A bright light source is positioned directly in front of the jeweler, illuminating the work area. The overall scene conveys a sense of precision and care in the craft of jewelry making.

WE TREAT PEOPLE  
WITH CARE AND  
RESPECT

"WE BELIEVE IN HUMANITY  
AND THEREFORE SHOW  
CARE AND RESPECT FOR ALL  
PEOPLE AND WILL NOT TURN  
A BLIND EYE TO WHAT IS  
WRONG."



*We achieve our goals through our people. We are committed to our people and their development, and we value their diverse and unique contributions. We are focused on maintaining a work environment where our employees can develop and thrive and work with our host communities to create mutually beneficial relationships.*



## ALWAYS

- Report any potential or suspected labour or human rights abuse, or suspected modern slavery, in our operations or our value chain - including those of our business partners.
- Undertake risk-based due diligence of higher-risk business partners to assess their approach to respecting human rights.
- Encourage business partners and colleagues, including suppliers and contractors, to report any potential or suspected breaches.



## NEVER

- Agree to any action likely to result in adverse impacts on the labour or human rights of fellow employees, local communities or other stakeholders.
- Neglect the rights of vulnerable and/or marginalised groups in our human rights due diligence process. Ensure that their voices are heard and interests fully represented in any impact analysis or remediation processes being undertaken.
- Ignore human rights abuses in suppliers, customers and other partner organisations.

## LABOUR AND HUMAN RIGHTS

We have a fundamental commitment to respecting labour and human rights. This informs our core values. It is further expressed through our observance of core labour rights; being guided by relevant laws and regulations; and being a signatory to the United Nations Global Compact and a supporter of the UN Guiding Principles on Business and Human Rights. We aim to identify, assess and minimise potential adverse human rights impacts that we cause or contribute to, or that are linked to our business, including by our suppliers or third parties acting on our behalf, through ongoing due diligence and appropriate management. We further emphasise our commitment to civic freedoms and the rule of law, including respecting the rights of human rights defenders. Should adverse impacts occur as a result of our operations, our objective is to ensure that these are remediated to the greatest possible extent.

As a signatory to the Voluntary Principles on Security and Human Rights, this includes a commitment to maintaining the safety and security of our operations and staff within an operating framework that encourages respect for human rights via any necessary interactions with both public and private security providers. Where it is within our power to do so, we also seek to promote the observance of human rights in the countries where we work.

We are committed to the International Labour Organization's core labour rights covering the right to freedom of association and collective bargaining, the right to equal remuneration for equal work, and a zero tolerance approach to modern slavery, forced labour, child labour and unfair discrimination.



### LABOUR AND HUMAN RIGHTS

#### Resources:

Group Workplace Human Rights Policy

The Best Practice Principles and Assurance Programme  
Anglo American ("Social Way")

Modern Slavery Act statements

#### Who can I speak to?

Line manager  
Corporate Affairs  
Human Resources  
Supply Chain





## HOST COMMUNITIES

We are committed to making a lasting, positive contribution to the countries and communities in which we operate, in order to be 'partners in the future'. Maintaining open and robust engagement with the communities affected by our operations – in which many of our employees may also live – is a priority for us and is based on our values of 'Show We Care' and 'Build Trust'. We seek to share, plan and communicate with those communities transparently and honestly, and aim always to engage with them in a manner that avoids all unethical behaviour or improper influence (or the appearance of the same). We want to create and maintain mutually beneficial relationships by understanding and maximising the positive influence we can have on local and regional development. The Anglo American Social Way (Social Way) describes our framework for social performance, giving clear requirements for all our sites at all phases in their development. Processes for planning and undertaking our mining operations must always aim

to avoid or minimise adverse impacts on affected stakeholders, including vulnerable groups, and maximise development opportunities.

We respect the rights, interests and perspectives of indigenous Peoples, and take into account their unique and special connections to land, water and other natural resources. Processes for planning and undertaking our mining operations must always aim to avoid or minimise adverse impacts on these and other vulnerable minority groups to the greatest extent possible. We try to avoid, or at least minimise, any negative impacts we might have on local stakeholders. It is important that commitments to stakeholders are only made by authorised employees and that these commitments are then met. It is also important that all our employees act as good company ambassadors in the way they conduct themselves in our host communities. Any grievances or social incidents that we learn of must be immediately reported to the site-based Social Performance team or managers.



### ALWAYS

- Follow the Anglo American Social Way requirements when engaging with host communities.
- Be respectful, open and transparent in all engagement with communities.
- Seek advice from social performance specialists when engaging with host communities.
- Report and investigate stakeholder grievances and other incidents with social consequences.



### NEVER

- Make material operational changes without considering and managing impacts on host communities.
- Assume that responsibility for managing social issues rests only with site-based social teams.
- Exert any improper, unethical or illegal influence over any individuals in communities affected by our operations.
- Make commitments to communities without the proper authority and without recording them in site commitment registers.



## HOST COMMUNITIES

### Resources:

Group Social Performance Policy  
The Best Practice Principles and Assurance Programme  
Group Workplace Human Rights Policy  
Anglo American Social Way ("Social Way")  
Anglo American Business Integrity Policy and Prevention of Corruption Procedures

### Who can I speak to?

Social Impact Team  
Corporate Relations and Sustainable Impact  
Site-based Social Performance representatives

## EQUALITY (DIVERSITY, INCLUSION AND FAIR TREATMENT)

De Beers Group promotes an inclusive environment where every colleague is valued and respected for who they are and has the opportunity to fulfil their potential. All colleagues are expected to treat each other with care and respect, and we are committed to ensuring that every individual can bring their whole self to work each day regardless of their gender, sexual orientation, gender identity and expression, age, race, ethnicity, religion, national origin or disability.

Inclusion is the key foundation to creating a psychologically safe workplace where all colleagues feel safe to continually learn, are empowered to ask questions, and challenge ideas and contribute to achieving safe, responsible production. Psychological safety underpins all our behaviours, goes to the heart of our Values and our operating and organisation models, where we combine innovation, technology and our world-class colleagues in order to fulfil our Purpose.

We believe our workforce should reflect the diversity of our partners, customers and communities and countries in which we operate. We set appropriate global goals for diversity at senior levels to ensure continuous improvement, to secure our future talent pipeline and to commit to practices which help ensure that the careers of all colleagues are managed fairly and inclusively.



## HARASSMENT AND BULLYING

We value our employees and treat them with dignity and respect. At De Beers Group, we have zero tolerance of any form of workplace bullying, harassment, victimisation or discrimination. Harassment includes any behaviour that is considered unwanted because it makes someone feel uncomfortable, intimidated, degraded, humiliated or offended. We all have a right to work in an environment that is free from violence or harassment.



### ALWAYS

- Treat others as you expect to be treated yourself.
- Speak up about any discrimination or behaviour you might see which you know is wrong.
- Appoint on merit in line with resourcing policies and taking account of legal and affirmative action requirements in specific geographies.



### NEVER

- Discriminate against anyone because of gender, sexual orientation, gender identity and expression, age, race, ethnicity, religion, socio-economic background, national origin or disability, except where required by law.
- Disseminate or display materials that can reasonably be expected to cause offence because of their treatment of the above issues; for example, sexually explicit images.



### EQUALITY

#### Resources:

Local employee handbook or HR guideline  
Group Flexible Working Group Statement  
The Best Practice Principles and Assurance Programme  
Group Inclusion and Diversity Policy  
Group Workplace Human Rights Policy

#### Who can I speak to?

Line manager  
Human Resources representative  
Inclusion and Diversity Representative



### ALWAYS

- Stand up for everyone.
- Speak up if you witness or experience bullying, harassment or victimisation.
- Support vulnerable colleagues who may be experiencing abuse by knowing the support available and where/how it can be accessed.



### NEVER

- Behave in a way that undermines or humiliates an individual or violates their dignity.
- Make unwanted or inappropriate comments, suggestions or physical contact.
- Be a bystander to acts of bullying, harassment or victimisation



### HARASSMENT AND BULLYING

#### Resources:

Group Workplace Bullying and Harassment Policy  
Group Recognising and Responding to Domestic Violence Policy  
Local employee handbook or HR guidelines  
Prevention and Elimination of Sexual Harassment and Gender based Violence Policy (South Africa)

Group Employee Human Rights Policy  
The Best Practice Principles and Assurance Programme

#### Who can I speak to?

Line manager  
Human Resources  
Inclusion and Diversity Representative





## PERSONAL INFORMATION AND PRIVACY

We must treat people with care and respect by respecting the privacy of individuals, and by complying with all applicable laws on the collection, storage, use, retention, transfer and deletion of personal data. Personal data typically includes any information relating to an individual person who can be identified from that information. This includes anything ranging from an individual's name or passport details, through to their opinions or other people's feedback on them.

We only process personal data lawfully and fairly, and will only keep that data for as long as it is strictly necessary in light of the purpose for which the data was collected. We only share personal data with others when there is a legitimate business or legal need to do so. We ensure that the transfer of that data complies with applicable data privacy laws and that anyone receiving personal data from us understands the importance of protecting that data. Where we work with others, such as

suppliers and consultants, we make clear the importance of our standards on data privacy. We respect the rights each of us has to review, update and correct our personal information.

We take measures to prevent any personal data breach. A personal data breach is any accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. All suspected or actual breaches must be immediately reported to [dataprotection@angloamerican.com](mailto:dataprotection@angloamerican.com).



### ALWAYS

- Consult the Data Protection Team prior to starting a new project or activity that involves personal data.
- Keep personal data confidential and secure and protect it against accidental and malicious loss, destruction, damage and unauthorised disclosure.
- Process personal data only where we have a lawful reason to do so.
- Be transparent with individuals about what we are doing with their data.
- Inform the Data Protection Team immediately if a suspected or confirmed data breach has occurred.



### NEVER

- Access personal data unless you have the appropriate authorisation.
- Share personal data outside of the organisation, unless appropriate due diligence has been conducted on the receiving organisation, and a suitable contract is in place.



### PERSONAL INFORMATION AND PRIVACY

#### Resources:

Global IM Acceptable Use Policy  
Global IM Group Information Security Policy  
Anglo American Data Privacy Policy

#### Who can I speak to?

Line manager  
Group legal  
Data Protection Team  
([dataprotection@angloamerican.com](mailto:dataprotection@angloamerican.com))  
Global IM representative



# WE CONDUCT BUSINESS WITH INTEGRITY

“WE ALWAYS ACT  
HONESTLY, FAIRLY,  
ETHICALLY AND  
TRANSPARENTLY.”



*We are a trusted company. We seek to build and maintain the trust and confidence of our business partners. We gain our competitive advantage through strong performance, not unethical or illegal practices.*



## BRIBERY

We stand against corruption. Bribes and other corrupt payments are unethical, contrary to our Values and illegal. We neither give nor accept bribes nor permit others to do so in our name, either in our dealings with public officials, the communities in which we operate or with suppliers and customers.

Our employees are required to comply with our Business Integrity Policy. We are committed to taking all reasonable steps to ensure that our business partners

also understand and comply with our Business Integrity Policy when doing business with us or on our behalf.

We support efforts to eliminate bribery and corruption worldwide and encourage our suppliers, customers and partners to do the same.



### BRIBERY

#### Resources:

Anglo American Business Integrity Policy and Prevention of Corruption Procedures  
The Best Practice Principles and Assurance Programme

#### Who can I speak to?

Line manager  
Business Integrity Implementation Manager or Compliance Function  
Group Legal  
Best Practice Principles team  
Ethical Business Conduct team



## ALWAYS

- Know who you are doing business with by ensuring that appropriate due diligence is conducted on potential counterparties.
- Familiarise yourself with, and abide by the Business Integrity Policy and related procedures.
- Contact your Business Unit or corporate function Business Integrity Implementation Manager, or the Ethical Business Conduct team, if you have any bribery or corruption related questions or concerns, e.g. if a third party attempts to influence you improperly, or if that could be the perception.
- Attend Business Integrity training if nominated to do so; it is designed to help you manage bribery and corruption risk.



## NEVER

- Offer or accept bribes, kickbacks, improper payments (including facilitation payments), or other advantage to or from third parties.
- Use De Beers funds or resources, or personal funds on De Beers's behalf, to make political donations to political parties, or to support any political activity, candidate or party.



## GIFTS, ENTERTAINMENT AND HOSPITALITY

Our relationships with suppliers, customers and business partners, including governmental and other public bodies, are conducted on the basis of objective factors and are not influenced by the offer or acceptance of gifts or the provision or receipt of entertainment or hospitality. Our policies are not intended to prevent the establishment and building of legitimate business relationships.

However, inappropriate (i.e. excessive or lavish) gifts, entertainment and hospitality can be seen as a way to gain business advantage unfairly and can amount to a bribe. Gifts, entertainment or hospitality offered or provided to government or public officials carry a heightened risk of perceived bribery and always require careful and prior consideration.



### GIFTS, ENTERTAINMENT AND HOSPITALITY

#### Resources:

Anglo American Group Business Integrity Policy and Prevention of Corruption Procedures  
Local gift, entertainment and hospitality (GEH) policies and procedures

#### Who can I speak to?

Line manager  
Business Integrity Implementation Manager or Compliance Function  
Ethical Business Conduct team  
Corporate Affairs  
Group Legal



### ALWAYS

- Consider if its appropriate and proportionate to offer or accept a gift, entertainment or hospitality under the circumstances.
- Follow the applicable gift, entertainment and hospitality disclosure and approvals procedures and requirements.
- Report conduct that may be perceived as an attempt to bribe.
- Remember that gifts, entertainment and hospitality involving government or public officials carry a heightened risk of perceived bribery and therefore require prior consultation with the local Business Integrity Implementation Manager and/or the Ethical Business Conduct team and/or Group Legal.



### NEVER

- Offer gifts, entertainment or hospitality to gain a business advantage.
- Provide gifts, entertainment or hospitality from your own money to avoid an applicable procedure.
- Offer or accept gifts, entertainment or hospitality that are lavish, inappropriate or in cash.
- Offer or accept gifts that may create a sense of obligation, may create a conflict of interest, or may be perceived to influence your (business) judgement.



## CONFLICTS OF INTEREST

Our employees, contractors and consultants must avoid actual or perceived conflicts of interest involving themselves, close relatives or associates. Where a conflict could arise, you must draw this to the attention of your line manager or someone in Human Resources and ensure that the conflict is managed appropriately.

A conflict of interest exists when your personal or professional interests or activities affect your ability to make clear, objective decisions for De Beers Group.

Actual conflicts of interest must be avoided, but even the possibility of a conflict of interest can be damaging to De Beers Group and must be disclosed,

discussed and managed as early as possible. There are many ways that conflicts of interest could arise. For example, if you:

- are a board member of another organisation
- have a material interest in a private company that is related to your work
- have another job outside of De Beers Group
- have an intimate relationship with another employee at work who can influence your salary, rating or promotion
- have an intimate relationship with a representative of a business partner or competitor of De Beers Group.



### CONFLICTS OF INTEREST

#### Resources:

Anglo American Group Business Integrity Policy and Prevention of Corruption Procedures  
Local conflict of interest policies and procedures

#### Who can I speak to?

Line manager  
Business Integrity Implementation Manager or Compliance Function  
Human Resources representative  
Ethical Business Conduct team  
Corporate Affairs  
Group Legal



### ALWAYS

- Think about whether a situation may create a real or perceived conflict of interest and how this might be perceived by others.
- Discuss any possible conflict with your line manager or Human Resources as

early as you can and be open and transparent about the situation.

- Follow the policies and procedures that have been established for disclosing and managing conflicts of interest.



### NEVER

- Hide or fail to disclose any actual or possible conflict of interest.

## FAIR COMPETITION

We are committed to a free-market economy where vigorous but fair competition will result in the most efficient allocation of goods and services, the lowest prices, the highest quality and optimal innovation.

We prohibit anti-competitive practices and will not tolerate any such activity by our employees. We are subject to competition laws (also known as antitrust laws) in the jurisdictions in which we do business, and we are committed to conducting our business in compliance with these laws.



### ALWAYS

- Consider who De Beers Group's competitors are or might be.
- Contact Group Legal before any new contact with a competitor or potential competitor.
- Contact Group Legal if a competitor discloses confidential information to you, directly or indirectly, outside of arrangements approved by Group Legal.
- Obtain prior approval from Group Legal before joining an industry association.
- Participate in the compliance programme (including training) if nominated to do so – it is designed to help you manage competition law risk.



### NEVER

- Reach an agreement or understanding with a competitor to:
  - fix purchase or selling prices
  - limit capacity, production or supply
  - boycott purchases from or sale to another business
  - allocate customers or markets
  - rig bids
- Reach an agreement or understanding with a supplier or customer to:
  - fix resale price(s)
  - ban exports
- Disclose confidential information to a competitor, directly or indirectly, without first discussing with Group Legal.
- Comment negatively on a competitor or its products or services.



### FAIR COMPETITION

#### Resources:

Group Antitrust Policy  
Group Antitrust Compliance Procedures

#### Who can I speak to?

Group Legal  
(antitrust@angloamerican.com)



## SUPPLIERS, CUSTOMERS AND OTHER BUSINESS PARTNERS

We are committed to a purpose-driven, agile and resilient Supply Chain organisation – this compels us to be careful and fair about how we select and use suppliers, customers and other business partners.

We expect our suppliers and partners to meet legal requirements and share our commitments to safety and sustainability. This includes the integration of our cost communities, conducting business fairly and with integrity, the protection of human rights, respect for our enthronement and the principles set out in our Code.

Our reputation and ultimately our financial performance can be significantly damaged by the actions of our counterparties, including suppliers,

advisers, agents and contractors. In certain circumstances, De Beers Group may be held accountable for their actions.

It is never acceptable for any third party to carry out an act on De Beers Group's behalf which, were it done by De Beers Group directly, would constitute a breach of the law or this Code or our policies.

Through our commitment to inclusive procurement we prioritise purchasing from host communities. This helps us build a resilient supply chain, allowing us to benefit from local expertise, innovation, and skills, while supporting the socio-economic development of the areas where we operate.



### ALWAYS

- Comply with procurement and supplier management procedures relevant to your role.
- Treat suppliers and customers in an honest, respectful and responsible way.
- Participate in training and education to understand how improper contact could arise.
- Adhere to the Business Integrity Policy and procedures when involved in procurement processes.
- Use YourVoice to report any potential unethical behaviours on the part of suppliers or De Beers staff
- Highlight the importance we place on business integrity and sustainability when engaging with counterparties.



### NEVER

- Seek to bypass established Supply Chain or local procedures.
- Discuss pricing, share confidential information or enter into commercial discussions with a supplier, or prospective supplier, without a Supply Chain representative present.
- Encourage a supplier to do something in connection with its business dealings with De Beers Group that would breach our Code or the law.
- Accept anything of value from an existing or potential counterparty (e.g. gift, entertainment, hospitality) that is not aligned with Group, Group Function or Business Unit gifts, entertainment and hospitality disclosure and approval procedures and requirements. If in doubt, seek prior guidance and approval.
- Provide any counterparty or potential counterparty with any unfair or improper advantage.



## SUPPLIERS, CUSTOMERS AND OTHER BUSINESS PARTNERS

### Resources:

The Best Practice Principles and Assurance Programme  
 Anglo American Supply Chain Policy and Standards  
 Group Antitrust Policy and Group Antitrust Compliance Procedures  
 Local GEH Procedure  
 Local Procurement Policy (where applicable)  
 Anglo American Business Integrity Policy and Prevention of Corruption Procedures  
 Group Employee Human Rights Policy  
 Anglo American Social Way ("Social Way")  
 Supply Chain Responsible Sourcing Standard for Suppliers  
 Inclusive Procurement Policy  
 Modern Slavery Act statements

### Who can I speak to?

Line manager  
 Corporate Affairs  
 Supply Chain  
 Business Integrity Implementation Manager or Compliance Function  
 Ethical Business Conduct Team  
 Group Legal

## MONEY LAUNDERING AND THE FINANCING OF TERRORISM

De Beers is committed to compliance with all relevant legislation relating to the prevention of money laundering and financing of terrorism in the jurisdictions in which we operate. Money laundering happens when criminal money or assets are hidden in otherwise legitimate business dealings, or when legitimate funds are used to support terrorism or crime.

Should any employee have cause to suspect that De Beers might be or has been exposed to funds for which the

source is doubtful, the circumstances must be reported to Group Legal in the first instance. Should any act of money laundering or financing of terrorism potentially be indicated, this would need to be notified to the relevant regulatory authorities without delay by Group Legal.

All employees must immediately refer any enquiries from regulators or public authorities pertaining to these topics to Group Legal, and must not discuss this with anyone else without pre-clearance.



### MONEY LAUNDERING AND THE FINANCING OF TERRORISM

#### Resources

Group Anti-Money Laundering, Counter Financing of Terrorism, Sanctions and Trade Controls Policy  
The Best Practice Principles and Assurance Programme

#### Who can I speak to?

Group Legal  
Business Integrity Implementation Manager or Compliance Function



### ALWAYS

- Know exactly who you are doing business with – where relevant, make sure you perform due diligence on new business partners.
- Raise concerns if you notice something which may look like money laundering and financing of terrorism.
- Participate in training – it is designed to help you manage money laundering and financing of terrorism risk.



### NEVER

- Deal with criminals or get involved with money laundering and financing of terrorism.
- Fail to report suspected money laundering and financing of terrorism.

## SANCTIONS AND TRADE CONTROLS

De Beers is committed to compliance with all applicable sanctions and trade controls. This includes economic sanctions, and import and export laws.

Most countries in which we operate impose restrictions on the movement of products across borders. Various countries, regions and organisations, such as the USA, European Union and the United Nations, have imposed trade sanctions against certain countries, organisations and individuals. Some countries penalise people and companies that undertake transactions prohibited by their sanctions' regime even though there is no connection between the sanctioning country and the transaction.

Economic or trade sanctions are complicated and far-reaching. If you are in any way involved in business or transactions with a high-risk/sanctioned country, entity or

person, you must ensure compliance with all applicable laws. Entering into a transaction with a high-risk/sanctioned country, entity or person could prevent or significantly hinder De Beers Group's ability to continue raising finance in the international debt markets. You should consult with Group Legal as early as possible in such situations.

The import or export of certain goods or services may be prohibited or subject to regulatory requirements (such as satisfying registration requirements or obtaining a licence). Certain equipment, software and technology may need to be classified in advance, and have in place all appropriate labelling, documentation, licences and approvals before it is imported or exported.



### SANCTIONS AND TRADE CONTROLS

#### Resources

Anglo American Sanctions and Trade Controls Policy  
Group Anti-Money Laundering, Counter Financing of Terrorism, Sanctions and Trade Controls Policy  
The Best Practice Principles and Assurance Programme

#### Who can I speak to?

Group Legal  
Business Integrity Implementation Manager or Compliance Function



### ALWAYS

- Check early with Group Legal where you may be dealing with a sanctioned country, company or individual.
- Work out whether anything you are importing or exporting needs a licence or a prior registration.



### NEVER

- Transact with a third party that you do not know (without having conducted appropriate due diligence).
- Import or export new products or services without first checking whether they are subject to special regulatory requirements.



## WORKING WITH INSTITUTIONAL STAKEHOLDERS

To achieve our goal of safe, responsible mining that contributes to sustainable development, we must engage with governments to help shape the public policy that frames not only the mining industry, but also the broader public policy issues that are relevant to our business and our stakeholders.

We build constructive, lasting relationships with governments and engage with international organisations and civil society, directly and through our memberships of industry associations, to help develop robust policy and regulation. We are committed to contributing to the sustainable development and good governance of the countries in which we work. We therefore support the Extractive Industries Transparency Initiative and its efforts to allow citizens to see for themselves how their country's natural resources are being managed and how much revenue they are generating.

We engage in public policy and legislative issues that affect our business. We contribute useful information and expertise to help create sound, informed policy and legislation.

We seek to co-operate with government enquiries and investigations.

To avoid any potential perception of De Beers Group exercising improper influence over decision-making, we do not support any political party, group or individual. We do not provide financial or other support for political purposes to any politician, political party or related organisation, or to any official of a political party or candidate for political office, in any circumstances, either directly or through third parties. We use our influence with all industry associations of which we are a member to seek to ensure that those organisations operate in a way in which is consistent with the Code. There should therefore be no scope for a perception that De Beers is exercising improper influence through its membership of industry associations, or any perception that De Beers may encourage industry associations to pursue policies and actions not aligned with De Beers Values, Code and Policies.

As individuals, our employees have the right personally to take part in the political process, including making personal political contributions. However, they must make it clear that such support is based on their own political views and is not attributable to De Beers Group.



### WORKING WITH INSTITUTIONAL STAKEHOLDERS

#### Resources:

Group Government Relations Handbook and Toolkit  
Anglo American Group Business Integrity Policy and Prevention of Corruption Procedures

#### Who can I speak to?

Line manager  
Corporate Affairs  
Business Integrity Implementation Manager or Compliance Function  
Ethical Business Conduct team



### ALWAYS

- Be truthful, accurate, co-operative and courteous when dealing with government officials.
- Seek your line manager's approval before becoming involved in a business activity concerning De Beers Group that involves any political party.
- Make sure your personal interests or activities do not create a conflict of interest for you as a representative of De Beers Group.



### NEVER

- Attempt to obstruct the lawful collection of information, data, testimony or records by authorised government representatives.
- Use company funds or resources, or personal funds on the company's behalf, to make donations to political parties, or support any political activity, candidate or party.

## TAX

De Beers Group is committed to compliance with relevant tax laws in all the jurisdictions in which we operate, paying the right amount of tax at the right time, in the countries where we undertake business activity.

We believe in openness and transparency.

Our published Group Tax Strategy sets out our approach to tax and through our Tax and Economic Contribution Report, we disclose and report annually on our tax and economic contributions in each of our key operating jurisdictions.

Our commitment to compliance with relevant tax laws includes a zero tolerance approach to tax evasion. We are committed to ensuring that we comply with laws relating

to the prevention of tax evasion and the prevention of tax evasion facilitation. Tax evasion is a criminal offence; it means cheating the public revenue or fraudulently evading tax, generally by a deliberate action or omission, with dishonest intent. Tax evasion facilitation means being knowingly concerned in or taking steps with a view to the fraudulent evasion of tax by another person, or aiding, abetting, counselling or procuring the commission of that offence.

We are committed to taking appropriate steps to ensure that our employees and business partners, including persons or organisations who perform services for or on behalf of the Group, understand and comply with our Anti-Tax Evasion Policy.



### ALWAYS

- Follow the Group Anti-Tax Evasion Policy and our approach to tax as set out in the Group Tax Strategy.
- Raise concerns if you notice or suspect that a request or activity may concern tax evasion.
- Act responsibly in relation to all tax compliance matters, respecting the laws of each country in which we operate.
- Promptly report any incidences of facilitation of tax evasion.



### NEVER

- Engage in any form of tax evasion.
- Engage in any form of facilitation of tax evasion.



### TAX

#### Resources:

Group Tax Strategy  
Group Anti-Tax Evasion Policy  
Tax and Economic Contribution Report

#### Who can I speak to?

Group Tax  
Group Legal





WE PROTECT  
OUR PHYSICAL  
ASSETS,  
INFORMATION  
AND INTERESTS



**“WE VALUE AND ACTIVELY PROTECT  
DE BEERS GROUP’S ASSETS  
AS IF THEY WERE OUR OWN.”**



*We want to protect the reputation, assets and shareholder value of De Beers Group. We do this by protecting and using our resources wisely and carefully and by making sure we are honest and transparent about our operations and performance.*

## SECURITY

We are committed to ensuring the security of our staff, physical assets and products, and the continuity of our operations. This means ensuring that our world-class people feel safe to perform to the best of their abilities wherever they are acting on De Beers Group's behalf, that our products are safeguarded from initial point of extraction until they reach their customers, and that our property and critical equipment are protected in every location where we maintain a footprint.

Our Group Security Strategy is built on four distinct security pillars: security of people, operational security, asset protection and validation of security risk. Our Security Programme brings

coordination, accountability and standardisation across our organisation with regards to security threats which are dynamic and multiple. We operate in accordance with international standards and the laws of the countries where we operate.

We expect our colleagues, consultants, agents, contractors and suppliers to comply with the security protocols and procedures applicable to the sites/projects, maintain an appropriate state of vigilance and report to the local Security team or your line manager any perceived security threats or suspicious activity that may be indicative of such a threat at the earliest and safest possible opportunity.



### ALWAYS

- Adhere to the Group Security Policy and related standards.
- Comply with local security protocols and procedures.
- Maintain an appropriate state of vigilance and report to the local Security team or line manager any perceived security threats, incidents, misuse or suspicious activity.



### NEVER

- Fail to adhere to mandatory security protocols and procedures.
- Ignore reporting what you believe is a potential security issue or actual security incident – take responsibility for reporting these.



### GROUP SECURITY

#### Resources:

Anglo American Security Policy and associated standards and guidelines  
Group Security intranet site  
Local security protocols and procedures

#### Who can I speak to?

Line manager  
Local Security/Protection Services manager  
Group Security Team



## INFORMATION SECURITY AND PROTECTION OF DATA

De Beers Group is committed to becoming information security leaders in the diamond industry, enabling our most precious asset, our people, and the technology they operate both now and in the future. We seek to achieve this by taking a risk-based approach to enable the safe and resilient digital transformation of our business. Everyone has a responsibility for information security and data protection, and we all have a role to play in protecting De Beers Group's information assets in order to:

- Realise our strategic objectives through the creation of a digitally secure culture.
- Prevent the loss or misuse of De Beers Group information and data.
- Ensure De Beers Group meets its legal, regulatory, and contractual obligations relating to information security and especially with regards to highly confidential and personal data

We expect all employees to take all practical measures to ensure the confidentiality, integrity and availability of De Beers Group information. This means that each one of us is responsible for the data we produce, and must abide by our Information Security Policies, Standards and Procedures, ensuring that:

- Only authorised individuals have access to De Beers information
- De Beers information is trustworthy and accurate
- Reliable access to De Beers information by authorised individuals is guaranteed.
- When data is shared with third parties, the risks and opportunities are evaluated and its use is controlled.



### INFORMATION SECURITY

#### Resources:

Global IM Group Information Security Policy  
Global IM information Management Security Policies and Standards

#### Who can I speak to?

Line manager  
Information Management  
Global Information Security



### ALWAYS

- Familiarise yourself with the Group's Information Security and Data Policies and associated standards and procedures.
- Determine the information classification of a piece of information according to its value and sensitivity and keep it up to date.
- Apply the appropriate level of controls to secure the data according to its value.
- Only connect authorised De Beers Group devices to the corporate network.
- Use corporate solutions for instant messaging (however, when justified and authorised, non-standard applications can be used for communications involving information classified as Official).



### NEVER

- Use unapproved public IT services for company information.
- Have 'highly confidential' conversations in public places or through non-corporate messaging applications such as WhatsApp.
- Click on website links or attachments from unknown senders, or if they look suspicious or were unsolicited.

## ACCURACY OF DATA, INFORMATION AND RECORDS

We all take part in the recording of financial and non-financial information. We create many data, information and records daily to annual basis. Data may include day-to-day activities such as telephone records, emails, and operations data such as explosives used and materials moved. Information includes items such as customer contracts, timesheets, expense reports, equipment availability and incidents. Our records include submissions to regulatory agencies and contributions to internal and external reporting.



### ALWAYS

- Make sure that all transactions are properly authorised, recorded and reported.

Our stakeholders rely on the accuracy, completeness, timeliness, transparency and honesty of our data, information and records. All business records and information we create, in whatever form, must reflect the true nature of transactions and events. We must be open and honest about our recording and reporting of information, and be balanced in our communications considering both positive and negative impacts.



### NEVER

- Create false reports or records, or try to disguise what really happened.
- Destroy records unless authorised to do so.



## ACCURACY OF DATA, INFORMATION AND RECORDS

### Resources:

Group Policy for Financial Records and Reporting and Standards  
Group Policy for Reporting of Ore Reserves and Mineral Resources  
Group Information Security Policy and Standards

### Who can I speak to?

Line manager  
Group Finance team  
Global IM representative







## USE AND PROTECTION OF COMPANY PROPERTY

We must all protect De Beers Group's assets and property. These include facilities, property and equipment, vehicles, computers and information technology (IT) systems, data, employee time, information, corporate opportunities and money.

Employees have a responsibility to protect Anglo American's and De Beers Group's assets and resources against theft, loss, abuse, unauthorised access or disposal.

Employees may use De Beers Group's assets, including human capital, only for purposes related to discharging their De Beers Group job responsibilities and other such uses as are authorised.



### ALWAYS

- Prevent non-authorised personnel from accessing our facilities, information, data or other assets.
- Report any security issues discovered or suspected to the Global Information Management (IM) Security department for a follow-up investigation.
- Make sure valuable information is properly stored.
- Comply with the Business Integrity Policy and Prevention of Corruption Performance Standards when making our property available to third parties.

Occasional personal use of company IT assets is permitted, within reason, as long as it does not contravene the Group Acceptable Use of IT Policy, does not compromise the interests of De Beers Group or does not adversely affect job performance.

The use of De Beers Group's assets by third parties is generally acceptable in situations where there is a transparent and proper underlying business purpose for, or clear public benefit from, the use of the asset.



### NEVER

- Use De Beers Group's assets and resources for personal gain.
- Ignore security threats to assets.
- Offer the use of De Beers Group's property to influence a third party in connection with De Beers Group's business or offer something that could be perceived as a political donation.
- Use De Beers's assets to access any form of offensive content.
- Use De Beers's assets in a way that would breach the Group Policy on Bullying Harassment and Victimisation.



### USE AND PROTECTION OF COMPANY PROPERTY

#### Resources:

Anglo American Policy for Acceptable Use of Information Technology (IT)  
Anglo American Business Integrity Policy and related Prevention of Corruption Procedures

#### Who can I speak to?

Line manager  
Local Security team  
Finance team  
Global IM Security  
([globalIMSecurity@angloamerican.com](mailto:globalIMSecurity@angloamerican.com))  
Ethical Business Conduct team



## COMMUNICATING EXTERNALLY

Our communication, both written and verbal, should be clear, accurate, consistent and responsible. It must also comply with laws and regulations. For this reason, only those who have been authorised to do so in advance should talk to the media and make disclosures. Communication with the media, external speeches and presentations should be seen as an opportunity that can, when properly managed and executed, enhance De Beers Group's reputation. All our external advisers are subject to our Disclosure and Media Policy.

Any employee using social media in connection with De Beers Group should remember that they are an ambassador for the company and should therefore strive to protect the reputation of De Beers Group by communicating in line with its Values. Should anyone wish to comment in their personal capacity on issues directly relevant to De Beers Group, they should always use their real name, be transparent about their affiliation to De Beers Group, and make it clear that their opinions are their own and are not made on behalf of De Beers Group.



### COMMUNICATING EXTERNALLY

#### Resources:

Group Disclosure and Media Policy  
Group Social Media Best Practice and Guidelines  
Group Antitrust Policy and Group Antitrust Compliance Procedures

#### Who can I speak to?

Line manager  
Corporate Affairs  
Group Legal



### ALWAYS

- Consult early with Corporate Affairs and Sustainable Impact before making any communication that could affect De Beers Group.
- Provide advance notice to Corporate Affairs and Sustainable Impact of activity likely to cause media and other external stakeholder interest.



### NEVER

- Speak to the media without first consulting with the Corporate Affairs and Sustainable Impact team.
- Publicise personal grievances through social media.
- Disclose via external communications Anglo American's and De Beers Group's commercially sensitive information without prior legal and Corporate relations and Sustainable Impact approval.





## INSIDER DEALING

It is illegal to deal in De Beers Group or third-party securities or shares on the basis of inside information, or to encourage others to do so. Some employees will become aware of information about De Beers Group that is confidential and that could influence anyone contemplating investing in Anglo American shares or securities. Employees are forbidden to use De Beers Group's confidential or inside information for personal advantage. Employees are also prohibited from sharing confidential or inside information with others for the same purpose.

We protect our organisation and our shareholders through responsibly managing confidential information. Confidential information includes technical information about products or processes, vendor lists, pricing, marketing or service strategies, as well as non-public financial reports and information about mergers, sales and acquisitions.



### INSIDER DEALING

#### Resources:

Anglo American Dealing Policy

#### Who can I speak to?

Company Secretarial

Group Legal

Line manager



### ALWAYS

- Make sure you know how to classify and handle confidential information.



### NEVER

- Use inside information to gain personal advantage by trading in Anglo American or any third-party shares or securities.
- Share or provide tips to others (for example, family members) to gain advantage.

## INTELLECTUAL PROPERTY

Intellectual property refers to creations, inventions, industrial designs, artistic work and literature, symbols, names and images. Examples in the diamond mining context include technologies and processes created to extract and sort rough diamonds. Downstream examples include synthetic diamond detection technology (which may be protected by patents), diamond jewellery designs (which may be protected by design rights), websites and advertising/marketing materials including text, graphics, photographs and videos (which may be protected by copyright), and logos and brand names which will often be registered as trade marks.

We identify, manage and protect our intellectual property, including patents, designs, know-how, copyright, database rights, algorithms and models, domain names and trade marks. Our intellectual property gives us competitive advantage and protects our licence to operate. Unauthorised use by third parties may damage our brands and our reputation.



### ALWAYS

- Ensure that the creation of intellectual property is properly protected.
- Report any suspected misuse of our intellectual property.



### NEVER

- Share information relating to our intellectual property with others without obtaining proper authorisation to do so.
- Use third-party intellectual property unless you are authorised to do so.

We respect the intellectual property of third parties, such as suppliers, competitors and customers, and we only use it where we are properly authorised to do so. When undertaking research and development activities, employees must keep accurate records of these activities, such as the date on which the activities are performed and the persons involved in performing the activities.

All intellectual property rights created, designed or made during the course of any employee's work belong to De Beers Group.



### INTELLECTUAL PROPERTY

#### Resources:

Anglo American Intellectual Property Policy and Guidelines  
Group Antitrust Policy and Group Antitrust Compliance Procedures

#### Who can I speak to?

Line manager  
Group Legal  
Group Tax







# YourVoice

If you see an individual act or behave in a way you think is a breach of our Code or might be illegal or unethical, you have a responsibility to bring this to the attention of the company. This helps us to identify risks to our people, assets and communities, and demonstrates our unwavering commitment to do what is right. This can be done in a variety of ways.

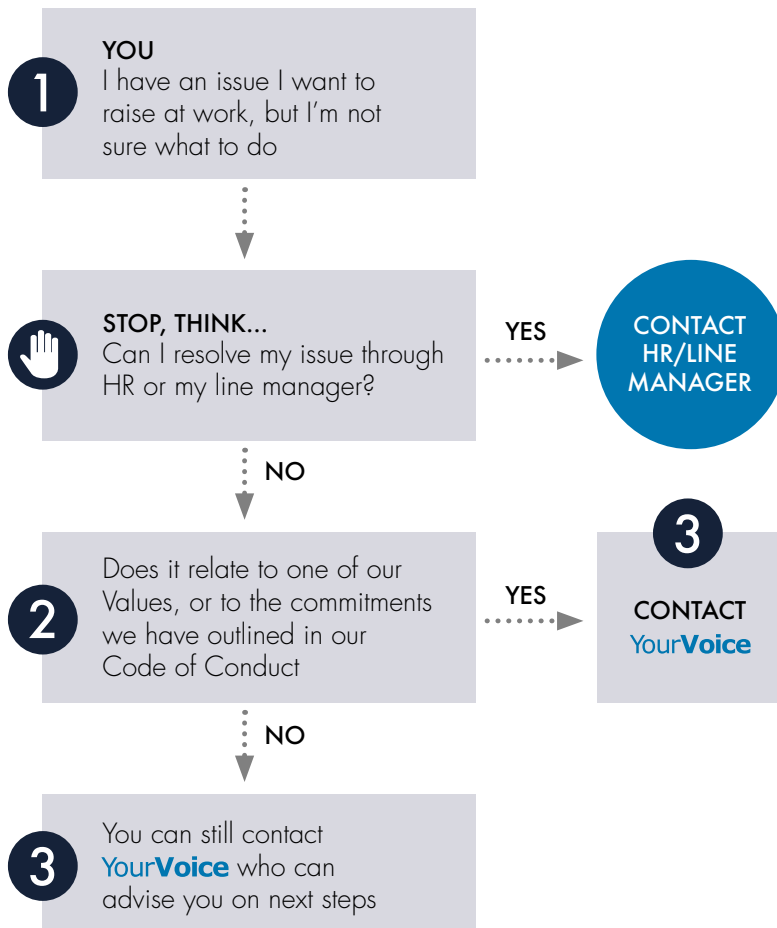
- Your line manager should always be available to you as a point of contact to hear your concern.

- If you feel you cannot talk to your line manager, try to speak to another line manager.
- If you cannot speak to any line managers, try to speak to someone who works in a supporting function, such as Safety and Sustainability, Group Legal, Business Integrity or Human Resources.
- If you cannot speak, or do not feel comfortable speaking to any of the above, you can use the YourVoice reporting tool.

Our YourVoice programme is a confidential reporting service for all employees, contractors, suppliers, business partners and stakeholders of De Beers Group to raise concerns about potentially unethical, unlawful or unsafe conduct and practices that contravene our Code.

We earn and maintain the trust of our stakeholders by living our values. Where this is not the case, you are putting at risk yourself, your colleagues, our business and our reputation.

## WHEN TO USE YourVoice



YourVoice is operated by an independent multilingual service provider and is available every day of the week at any time, day or night. YourVoice allows an individual, to confidentially and, if they choose, anonymously report their concerns. Using an external service provider offers protection for individuals who wish to remain anonymous.



## YOURVOICE

### Resources:

YourVoice website:  
[www.yourvoice.debeersgroup.com](http://www.yourvoice.debeersgroup.com)  
 Anglo American Whistleblowing Policy



## ZERO TOLERANCE COMMITMENT ON RETALIATION

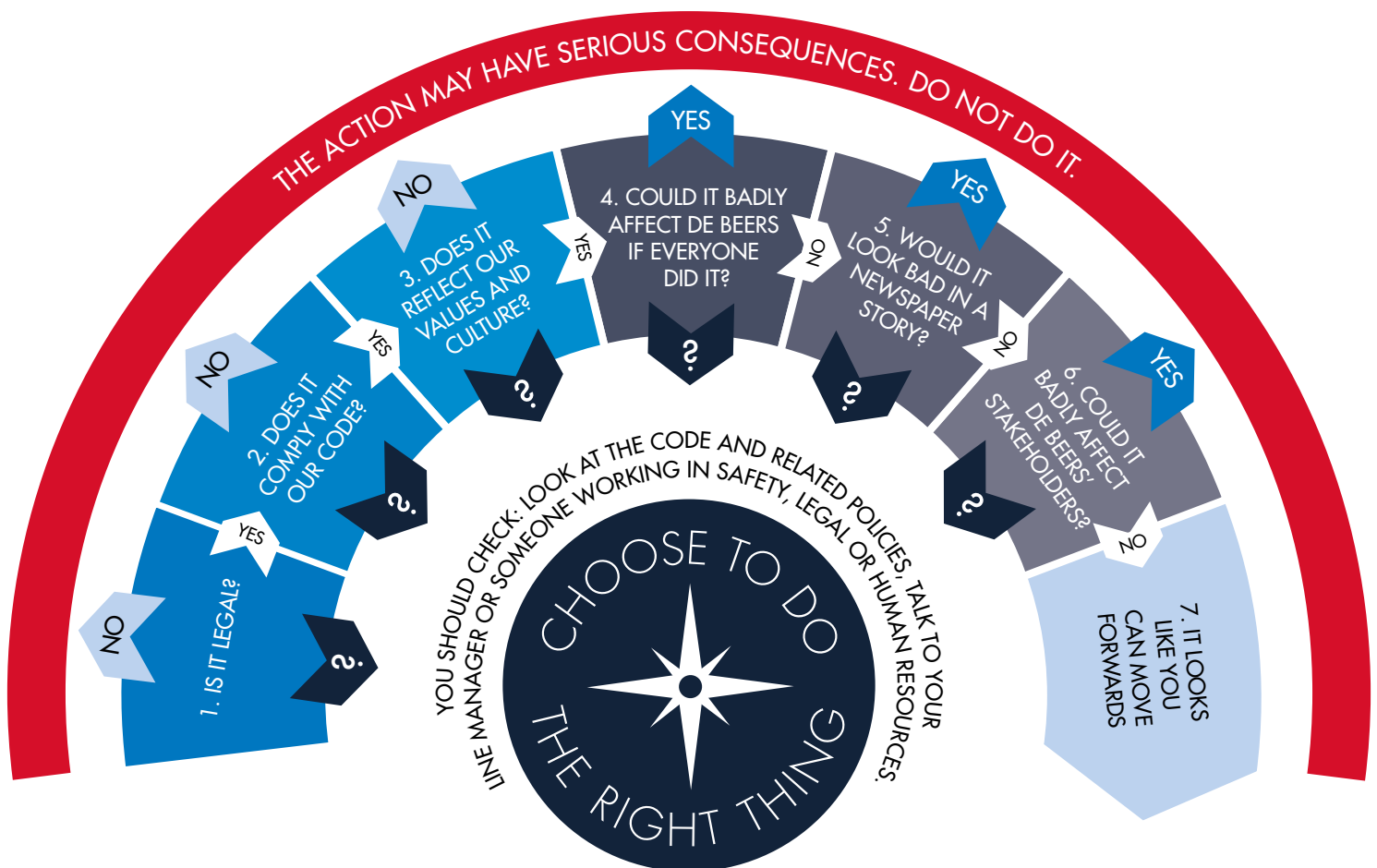
We prohibit any form of punishment, disciplinary or retaliatory action (or threats or attempts of the same) being taken against anyone for raising or helping to address a business conduct concern. Retaliation is grounds for disciplinary action including dismissal.

If you feel you or someone you know has faced retaliation, you should raise a concern immediately in line with the YourVoice section of this Code.

## WHAT SHOULD I DO IF I AM UNSURE ABOUT ANYTHING?

The Code covers many things, but it does not cover everything. We trust you to use good judgement to make ethical decisions and to ask for help when you have questions or concerns.

You can use the following decision tree to help you.



# OUR VALUES



## PUT SAFETY FIRST

We consider all risks to people and the environment before proceeding with any activity.

We address risks before beginning any activity, even if this means stopping a task. Zero harm is always our goal.



## BE PASSIONATE

We will be exhilarated by the product we sell, the challenges we face and the opportunities we create.



## PULL TOGETHER

Being united in purpose and action, we will turn the diversity of our people skills and experience into an unparalleled source of strength.



## BUILD TRUST

We will always listen first, then act with openness, honesty and integrity so that our relationships flourish.



## SHOW WE CARE

The people whose lives we touch, their communities, nations and the environment we share, all matter deeply to us.

We will always think through the consequences of what we do so that our contribution to the world is real, lasting and makes us proud.



## SHAPE THE FUTURE

We will find new ways. We will set demanding targets and take both tough decisions and considered risks to achieve them.

We will insist on executional excellence and reward those who deliver.



## DE BEERS PLC

Registered office:  
44 Esplanade,  
St Helier,  
JE4 9VG, Jersey

Registered in Jersey

T + 44 (0)20 7404 4444

[www.debeersgroup.com](http://www.debeersgroup.com)

Company number: 122752

A member of the Anglo American plc group

Version 3 - Feb 2024

In this document references to "De Beers", the "De Beers Group", the "Group", "we", "us", and "our" are to refer to either De Beers Group and its subsidiaries and/or those who work for them generally, or where it is not necessary to refer to a particular entity, entities or persons. The use of those generic terms herein is for convenience only, and is in no way indicative of how the De Beers Group or any entity within it is structured, managed or controlled. Anglo American subsidiaries, and their management, are responsible for their own day-to-day operations, including but not limited to securing and maintaining all relevant licences and permits, operational adaptation and implementation of Group policies,

management, training and any applicable local grievance mechanisms. Anglo American produces group-wide policies and procedures to ensure best uniform practices and standardisation across the De Beers Group but is not responsible for the day to day implementation of such policies. Such policies and procedures constitute prescribed minimum standards only. Group operating subsidiaries are responsible for adapting those policies and procedures to reflect local conditions where appropriate, and for implementation, oversight and monitoring within their specific businesses.