DE BEERS GROUP

DE BEERS PLC UK MODERN SLAVERY ACT STATEMENT

For the financial year ending 31 December 2025

CONTENTS

INTRODUCTION

Statement by CEO

This Modern Slavery Statement[1] is made by De Beers plc, the parent company of De Beers Group[2] pursuant to section 54 of the Modern Slavery Act 2015 (the Act)[3] for the financial year ending 31 December 2025. It is the 10th Statement made by De Beers Group for the purposes of section 54 of the Act.

As one of the world's leading diamond companies, we want to lead the industry by example, influencing positive change and shaping the way the world experiences diamonds. Respect for human rights is embedded across all our Group operations and within our culture. It is a critical foundation of our Building Forever sustainability framework and a commitment reflected in our Code of Conduct.

Our strict requirements relating to the respect for human rights, including labour rights, non-discrimination, and the prohibition of the use of child and forced labour, support our commitment to comply with local legislation and adhere to international labour and human rights conventions. They also cover our entire diamond value chain.

The Best Practice Principles Assurance Programme was launched in 2005 and applies throughout our diamond value chain, from discovery to retail. The Programme features some of the strictest standards in the industry and, together with our broader policies, Code of Conduct and due diligence processes, requires that De Beers Group diamonds adhere to international human rights frameworks.

This Modern Slavery Statement highlights the steps we have taken to identify and mitigate potential risks of modern slavery in our business and supply chains. During 2025, no incidents specifically relating to modern slavery, forced labour or child labour were identified through our applicable risk management programmes. The Statement provides a detailed update on De Beers Group's business activities and our policies and processes for conducting human rights due diligence to identify modern slavery, forced labour and child labour risks and explains how we have assessed the effectiveness of the measures we have implemented.

This Statement was approved by the Board of De Beers plc on 22 July 2026.

Al Cook
Chief Executive Officer

[1] De Beers plc Modern Slavery Statements have been published annually since 2017 and are available here. A separate Modern Slavery Statement is being made by Anglo American plc and its relevant owned and controlled entities, available here.

[2] For ease of reading, in this Statement we use generic language to describe the group. References to "De Beers", "De Beers Group", the "Group", "we", "us", and "our" are used to refer to either De Beers plc 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 in this Statement is for convenience only and is in no way indicative of how De Beers Group or any entity within it is structured, managed or controlled. De Beers Group 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. De Beers produces group-wide policies and procedures to ensure best uniform practices and standardisation across 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.

[3] 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. The De Beers Group entities that we have assessed as being subject to section 54 of the Act are: De Beers UK Limited, Charterhouse CAP Limited, Debcore Limited and Lightbox Jewelry Ltd[1]. The board of each of these entities has approved this Statement. This Statement also reports on relevant activities across De Beers Group, including our global operations and the following additional UK-based entities: GemFair Limited, Forevermark Ltd, De Beers Jewellers Limited, Element Six Technologies Limited, Element Six (UK) Limited, Element Six Holdings Limited, Element Six Abrasives Holdings Limited, Tracr Limited and IIDGR (UK) Limited. The board of each of these entities has approved this Statement.

[1] Lightbox Jewelry Ltd met the reporting threshold under section 54 of the Act for the 2025 financial year. The Lightbox business ceased trading in 2025; however, prior to this it operated under the Group's responsible sourcing, due-diligence, and risk-management framework. It is therefore included within the scope of this Statement.

Adherence to other reporting legislation

A separate statement has been issued by De Beers Canada Inc pursuant to section 11(1) and 11(2) of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023 (Canadian FLCLA). It is available here.[4]

OVERVIEW OF OUR GROUP

Established in 1888, De Beers Group is a leading global diamond group with expertise in the exploration, mining, sales and marketing of diamonds, as well as the manufacture of synthetic diamonds and supermaterials. De Beers and its managed (and non-managed) joint ventures employ over 15,947 people, including contractors, across the diamond pipeline. Our ultimate parent company is Anglo American plc (Anglo American), which owns 85% of De Beers. The remaining 15% shareholding is held by the Government of the Republic of Botswana.

Innovation sits at the heart of our strategy allowing us to offer a portfolio of businesses that includes our jewellery houses, De Beers London™ and Forevermark™, and pioneering industry services, such as diamond sourcing and traceability initiatives GemFair™ and Tracr™.[5]

The diagram below shows a simplified overview of our Group's business units. The purpose of this diagram is to assist the reader in understanding this Statement; it is not intended to be a complete representation of our Group corporate structure.

DE BEERS GROUP OWNERSHIP

85% Anglo American PLC	**15%** Government of the Republic of Botswana

Our Business Areas

Exploration

Global Exploration
De Beers Group's prospecting and exploration unit. Explores for rough diamond deposits in Angola, Canada, Botswana and South Africa.

Rough Diamond Production

Managed Operations
De Beers Group's mining operation unit. Recovers rough diamonds from Gahcho Kué mine in Canada and Venetia mine in South Africa.

Debswana
A 50/50 joint venture partnership with the Government of the Republic of Botswana. Recovers rough diamonds from Jwaneng, Orapa and Letlhakane mines in Botswana.

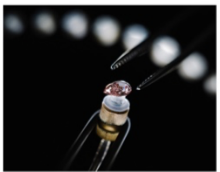
Namdeb Holdings
A 50/50 joint venture partnership with the Government of the Republic of Namibia. Recovers rough diamonds on land in Namibia through **Namdeb**, as well as off the coast of Namibia through **Debmarine Namibia**.

Rough Diamond Sales

Diamond Trading
De Beers Group's rough diamond sales and distribution function, comprised of Sightholder Sales and Auctions.

- **Sightholder Sales**
  Selling via term contracts to customers known as Sightholders through Global Sightholder Sales, as well as in-country selling businesses to support the development of local cutting and polishing operations.
- **Auctions**
  De Beers Auctions Botswana (DBAB), sells a small proportion of De Beers rough diamond production to the market.

GemFair
GemFair ethically sources diamonds from artisanal and small-scale miners in Sierra Leone with the aim to support the formalization of the artisanal sector.

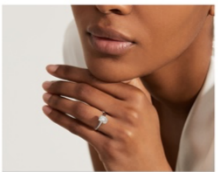


Technology and Services

Technology and Services
De Beers Group's innovation and technology function develops diamond mining, sorting and detection technology for the diamond industry.

De Beers Institute of Diamonds (IoD)
Provides Grading services to the diamond industry via two IoD laboratories in Maidenhead, UK and Surat, India, with a third planned in Gaborone, Botswana for 2026.

Tracr
Tracr is a digital platform for tracing diamonds from source at scale.



Jewellery Sales

De Beers London / De Beers Jewellers Ltd
De Beers Jewellers Ltd is the pinnacle of luxury diamond jewellery. De Beers Jewellers rebranded to De Beers London in February 2025. De Beers London has 25 retail stores globally and shipping to 15 countries.

Forevermark
Is a premium international diamond jewellery brand, which will focus its growth on the second largest diamond consuming market in the world, India.

Synthetics

Element Six
Designs, develops and produces synthetic diamond advanced material solutions for industrial applications.

The company is structured under two businesses:

- Technologies: 100 percent owned by De Beers Group
- Abrasives: 60 percent owned by De Beers Group and 40 percent owned by Umicore.

For more information on our Group, please visit: www.debeersgroup.com.

[4] For the avoidance of doubt, this Statement encompasses matters relevant to De Beers Canada Inc.

[5] ForevermarkTM, DE BEERS LONDON TM, Building ForeverTM, TracrTM and GemFairTM are Trademarks of De Beers Group.

GOVERNANCE, POLICIES AND PROGRAMMES FOR HUMAN RIGHTS

Governance

Respect for human rights (including modern slavery) forms an integral part of our Building Forever framework. Accountability for sustainability at De Beers plc level rests with the Board of Directors of De Beers plc. The Board is supported by the Executive Committee and the Sustainability Committee. A summary of our governance approach in 2025 is shown in the below diagram.

The Business, Ethics, Risk and Conduct Committee (BERC Co)

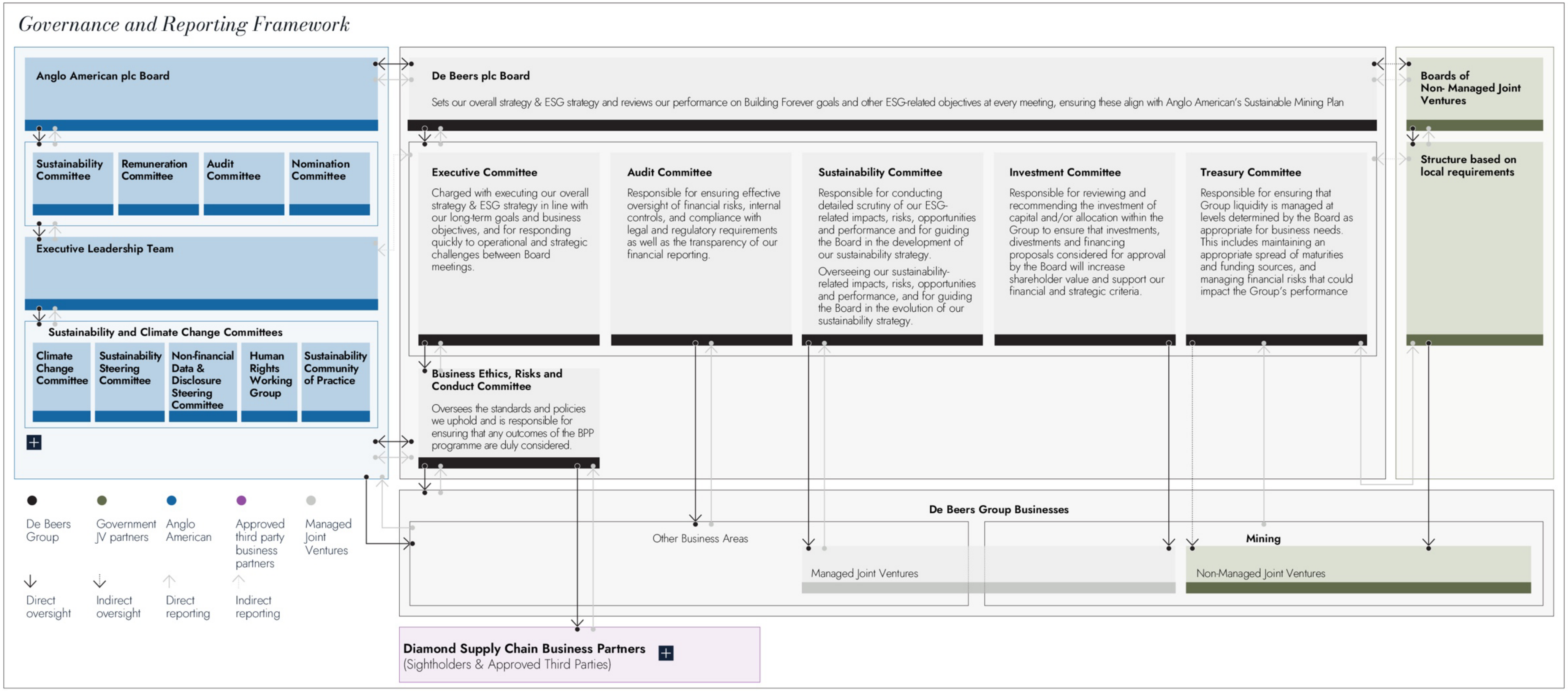
BERC Co (formerly known as Best Practice Principles Committee) is mandated to investigate potential non-compliances with the standards outlined in the Best Practice Principles (BPP) Assurance Programme (in which both [relevant] De Beers Group entities and third parties are required to participate) and the Pipeline Integrity (PI) Programme by any participant in those programmes. The outcomes of such investigations inform subsequent actions. BERC Co also oversees the implementation of the De Beers Group Sourcing Policies for Diamonds and for Metals, Minerals and Gemstones. This includes being accountable for ensuring that any allegations and findings of non-compliance that might have a human rights impact are duly considered.

Any material breaches of the BPP Assurance Programme by a participant may have contractual implications where they also constitute a breach of the applicable agreement. Such matters are subject to remediation and consequence-management processes overseen by BERC Co.

Sustainability Committee

The Sustainability Committee, a committee of De Beers plc, also has oversight over how potential impacts on human rights are considered and managed within our operations and is updated on the performance of our mining sites against the Anglo American Social Way and the outcomes of the BPP Programme, for both internal and external participants in the BPP Programme.

Corporate Governance



Our managed and non-managed joint ventures report to the Board via their own boards with the exception of Gahcho Kué, our managed joint venture in Canada in which Mountain Province Diamonds has a minority interest. This is overseen by the board, as are our business units with a presence outside the UK, our discovery entities, and our retail and wholesale polished diamond jewellery businesses except De Beers Jewellers. Tracr and De Beers Jewellers, as companies wholly owned by De Beers Group, have dedicated boards that are overseen by the De Beers plc Board. Group metrics and other information from reporting dashboards are verified and aggregated at the De Beers Group level by the Sustainability Reporting team and Risk Management teams before being reported to the Anglo American Executive Leadership Team (ELT) and on to the Anglo American Board, as outlined on pXXX of the 2025 Anglo American Integrated Annual Report.

Policies and Programmes

Our Guiding Principles

We hold ourselves and those we work with accountable for respecting human rights and conducting human rights due diligence aligned with the United Nations Guiding Principles on Business and Human Rights (UNGPs).

We set strict requirements relating to respect for human rights, including labour rights, non-discrimination and the prohibition of the use of child and forced labour, which are enshrined in our BPP Programme (see page 8 for more details). This set of ethical, social, and environmental standards, launched in 2005, helps to ensure we adhere to international human rights frameworks and applicable labour regulations.

The BPP Programme sets mandatory requirements for our own operations as well as all those doing business with us in the natural diamond supply and value chains, which in 2025, constituted some 3,049 entities employing approximately 244,448 people, including Sightholders (term contract rough diamond customers) and their relevant contractors. The BPP Programme is fully aligned to the UNGPs, the International Labour Organisation (ILO) Standards and the OECD Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance), among others. These principles and standards are also reflected in the Responsible Jewellery Council (RJC) Code of Practices, of which De Beers Group is a founding and certified member.

Human rights provisions are contained in several of our internal policies, including our Code of Conduct, Workplace Human Rights Policy, our Anglo American Group Security Policy and both of our Responsible Sourcing Policies for Diamonds and for Precious Metals, Minerals and Gemstones.

Along with our internal Workplace Human Rights Policy, we have an 'Introduction to human rights' training. This training is mandatory for all employees when they join the business and every two years thereafter. The training helps our employees understand what we stand for as a business and our expectations of them.

The Anglo American Social Way Policy guides our upstream human rights risk management activities, covering employees, contractors and suppliers. This is applied at De Beers Group managed operations in South Africa and Canada and has been adopted by mining operations in our joint ventures in Botswana and Namibia. The Policy underscores our human rights commitment and is underpinned by core social performance management principles based on international reference standards. It also sets out Anglo American's vision and principles for social performance, defines our system for social performance management through the Anglo American Social Way Toolkit and provides a high-level overview of its requirements.

We measure our progress on implementing the UNGPs in several ways, including through our Social Way assessments, our BPP Programme on-site verification visits, security effectiveness reviews, and our RJC recertification process.

In 2025, the following policies and standards underpinned our approach to managing modern slavery risk:

Across our Group and Value Chain:

- The De Beers Best Practice Principles Assurance Programme
- De Beers Responsible and Ethical Sourcing Policy for Diamonds
- De Beers Responsible Sourcing Policy for Precious Metals, Minerals and Gemstones (excluding Diamonds) for Use in Jewellery Products
- Workplace Human Rights Policy
- Anglo American Group Security Policy
- Social Performance Policy
- Whistleblowing Policy
- De Beers Code of Conduct

Upstream Activities:

- Anglo American Social Way 3.0

GemFair:

- GemFair Responsible ASM Assurance Programme
- GemFair Responsible Sourcing Policy for Diamonds
- GemFair Whistleblowing Policy

Element Six:

- Element Six Workplace Human Rights Policy
- Element Six Policy on Responsible Global Supply Chain of Minerals and Metals from Conflict-Affected and High-Risk Areas
- Element Six Code of Conduct

Supply Chain Management:

- Anglo American Responsible Sourcing Standard for Suppliers

Building Forever™

At De Beers, we believe natural diamonds can do more than sparkle. They can help societies thrive. They can make life brilliant.

Building Forever is how we translate rarity into helping to create sustainable, lasting impact that endures beyond diamonds for the countries, communities and ecosystems that make our business possible. The framework is built on critical foundations that cover our wide range of environmental, social and governance activities across the business. As a Group, we have elevated three interconnected goals for 2030 across Livelihoods, Nature and Climate, underpinned by our ongoing commitment to Provenance. The 2030 goals are grounded in science, and aligned with partner-country priorities, global standards and the UN Sustainable Development Goals. Last year, we celebrated five years of Building Forever impact since 2020 and reviewed our 2030 goals to sharpen our focus and strengthen our delivery. The result is: greater relevance and simplicity, responding directly to stakeholder expectations; alignment with the Origins business strategy, and best practice ESG standards including TNFD, GRI and SBTi; efficiency, consolidating programmes to strengthen delivery, and differentiation, through clear, measurable outcomes that build trust.

As a result, Building Forever now focuses on delivering our critical foundations, which are comprehensive of our material ESG risk management and compliance topics, and three interconnected goals for 2030 across Livelihoods, Nature and Climate - underpinned by our ongoing commitment to Provenance - to create meaningful impact that endures beyond diamonds:

- Livelihoods - Creating opportunities that multiply: Our livelihoods goal is to support four jobs in our communities for every one job in our operations. We are focused on delivering safe, high-quality employment, inclusive procurement, enterprise development and women's economic empowerment to build opportunities beyond diamonds.

- Nature - Giving back more than we take: Working in some of the most wild and beautiful ecosystems requires extreme care for nature. That is why our nature goal is to secure three times more land for future generations than the land that we impact and tap into our partnerships to protect a further 13M acres by 2030. This sits as part of our science-based commitment to be on a validated path to sustainable nature positive outcomes by 2030. We are doing this by:

    - Developing detailed, context-specific and independently monitored biodiversity management programmes at all our sites

    - Stewarding our nature reserves across Southern Africa, helping restore degraded landscapes into flourishing ecosystems, protecting keystone species

    - Working towards securing long-term protection for 240,000 acres of these nature reserves by 2030, supported by sustainable financing

- Climate - Reducing impact, responsibly: Our climate goal is to reduce our overall carbon footprint by a third by 2030 from a 2021 base year. This is reflected in our science-based targets (to reduce Scopes 1 & 2 by 42%; and reduce Scope 3 by 25%, which were validated by the SBTi in 2023), and supported by our long-term efforts on energy efficiency, a fair transition to renewable energy in partner countries, innovative research on alternative fuels and supply-chain decarbonization.

- **Provenance -** Trust, traced from source: Our provenance commitment for diamonds is to continue to pioneer on ethical sourcing and innovate on diamond traceability – setting a global standard for diamond provenance. This is delivered through our Best Practice Principles, our Tracr blockchain traceability platform and our work with GemFair to support responsible artisanal and small-scale miners.

Building Forever sits at the heart of everything we do. From our mining operations in Botswana, Namibia, South Africa and Canada, through to our jewellery stores, Building Forever – along with our Purpose and Values – guides our work, our decisions and our behaviours. We recognise the journey is never complete, and we will continue to listen and evolve Building Forever for greater, enduring impact.

We expect to transition to report against the new framework from 2026 onwards. Learn more about the Building Forever goals here.

PROGRAMMES TO SUPPORT RISK ASSESSMENT

We take a risk-based approach to identifying and (where appropriate) mitigating relevant risks (including modern slavery risks) in our own businesses and our supply chains, as well as in our value chain via a number of programmes.

Across our Group and Value Chain

The Best Practice Principles Assurance Programme

The BPP Programme consists of a set of mandatory environmental, social (including human rights) and ethical standards that we apply to all our own operations,[6] as well as to entities and their relevant subsidiaries that provide diamond-related contracted services to our Group (including jewellery manufacturing contractors for our house brands), and Sightholders (our term contract rough diamond customers). In addition, substantial diamond contractors (those that derive more than 75% of their revenue from a Sightholder) are required to participate in the Contractor BPP Programme, and all non-substantial contractors[7] must be declared to us.

The BPP Programme requires that every BPP participant has policies and procedures in place to help ensure respect for human rights and prevent modern slavery. Where relevant, due diligence, risk assessments and training are required to be implemented as part of these policies and procedures. If child labour, forced labour or the abuse of human rights is identified or suspected in our business, our diamond-related supply chain, or in relevant parts of our value chains, it is considered to be a material breach of the BPPs. In these circumstances, we may enforce our applicable contractual rights to require participants to take prompt measures to ensure that breaches are addressed in a rights-compatible manner and potentially impose sanctions until corrective actions have been implemented.

The BPP Programme consists of an annual, three-step assessment process:

- All relevant entities are required to complete a self-assessment workbook, recording their level of compliance against each applicable BPP requirement.
- An independent third-party verifier, SGS, is employed to conduct on-site verification visits. SGS annually visits up to 10% of all entities in scope per organisation.
- One third of all self-assessment workbooks are assessed through a desktop audit.

All Sightholders, before they are onboarded, are required to provide information on corporate structures along with details of Key Individuals that enables De Beers Group to undertake Know Your Counterparty (KYC) due diligence processes that encompass enquiries relating to forced labour and human trafficking violations.

The results of the BPP Programme assessment process are reported on an annual basis in our 'Building Forever: Our Journey' report, found here. Further information on the BPP Programme can be found here.

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[6] Participation in the BPP Programme excludes Element Six businesses.

[7] Contractors deriving less than 75% of their revenue from a Sightholder.

UPDATE ON PROGRESS

During 2025, we continued strengthening alignment between the BPPs, industry best practice and relevant responsible and ethical business practice assurance mechanisms and regulations. In particular, we worked to align the BPP requirements with the newly published RJC 2024 Code of Practice standards (against which De Beers is certified), for implementation in the 2026 BPP cycle. This work included an uplift to human rights due diligence expectations. These changes applied both to our own businesses and to all third-party BPP participants.

Effectiveness and Key Performance Indicators (KPIs)

During the 2025 BPP cycle, which ran from 1 January 2025 to 31 December 2025, the BPP Programme covered 244,448 people in 3,049 entities across 79 countries.[8] 115 verification visits took place, and 170 desktop reviews were conducted by SGS across all BPP Programme participants, including applicable parts of our Group.

- Within our business

51 self-assessment workbooks were submitted across the De Beers Group, and 11 desktop reviews and 12 onsite visits were conducted during the 2025 BPP cycle. These have been rated in accordance with the BPP Programme requirements.

- Within our value chain

During the 2025 BPP cycle, 159 workbooks were reviewed and rated in accordance with the BBP Programme requirements across our relevant value chain participants. In addition, 103 verification visits were completed based on the sampling requirements set out above. These included audits undertaken at Sightholders' non substantial contractor sites involved in manufacturing melee diamonds.

Non-compliances with the BPP Programme requirements within our value chain relating to human rights, of which modern slavery and human trafficking are key elements, are listed below:

HUMAN RIGHTS INDICATORS	2025	2024	2023	2022
Total number of Improvement Opportunities[9] identified under Child Labour/Forced Labour/Human Rights (including Responsible Sourcing):	2	0	10	29
Total number of Minor Infringements[10] identified under Child Labour/Forced Labour/Human Rights (including Responsible Sourcing):	1	3	6	24
Total number of Major Infringements[11] identified under Child Labour/Forced Labour/Human Rights (including Responsible Sourcing)	2	4	12	11
Total number of Material Breaches identified under Child Labour/Forced Labour/Human Rights (including Responsible Sourcing)[12]	0	1	0	0

[8] 2025 data from the De Beers Building Forever Report: Our Journey.

[9] An Improvement Opportunity is not a BPP compliance issue if a satisfactory solution is found and implemented during the course of an annual assessment cycle. Improvement Opportunities are also identified as areas of continuous improvement that go beyond best practice.

[10] A Minor Infringement is any BPP compliance issue that (a) can be rectified within a short period and (b), if managed responsibly, is not deemed by the assessors or independent verifiers to result in any adverse impact.

[11] A Major Infringement is any BPP compliance issue that (a) can be rectified within a reasonable period and (b), if managed responsibly, is not deemed by the assessors or independent verifiers to result in significant adverse impact.

[12] A Material Breach relates to any serious BPP non-compliance issue that contravenes the core BPP Programme (including adverse impact on human rights and the use of child labour or forced labour).

As reported in our 2024 Statement in respect of the financial year ending 31 December 2024, one human rights-related material breach (which was unrelated to modern slavery, forced labour or child labour) was identified in our value chain at an external BPP participant's factory, the first time in over a decade that such a significant human rights issue has been identified. The issue identified was not directly or indirectly related to modern slavery or forced labour, but relating to broader human rights allegations. Our governance mechanisms, as detailed in the BPP Manual (publicly available), were triggered, with the BERC Co overseeing the process for investigation and remediation. The participant established a comprehensive remediation plan for affected people. This was followed by an unannounced third-party verification visit to review the implementation of the remedial action which was confirmed to be satisfactory by the third-party.

Throughout 2025, we continued to monitor this entity and this segment of the industry through our risk-based approach. A further unannounced third-party verification visit was conducted during the year, and the findings were again assessed as satisfactory. We will continue to monitor the wider segment through our established risk-based processes into 2026.

In 2025, two Major Infringements were identified (under Section B6: Human Rights) at two external BPP participants' facilities. Both findings related to the absence of evidence demonstrating that security personnel employed by an outsourced provider had received the required Human Rights training at the time of assessment. These infringements were promptly addressed and closed by the respective participating groups.

One of the key aspects of both our Responsible Sourcing Policy for Diamonds and Responsible Sourcing Policy for Metals and Minerals is to require that all suppliers and/or jewellery manufacturers for our downstream diamond brands either participate in the BPP Programme or be certified against the RJC's Code of Practices. In 2025, no compliance issues were identified within the BPP Programme for our diamond suppliers and/or jewellery manufacturers supporting our downstream diamond brands. The BPP team will continue to work closely with all BPP participants, supporting their ongoing efforts to strengthen human rights and modern slavery risk management as part of our continuous-improvement approach.

The below table lists the overall number of Major and Minor Infringements[13] identified at our Sightholder operations (including their applicable contractors) and at our Group's jewellery manufacturing contractors across all our BPP requirements (including those pertaining to human rights):

OVERALL NUMBER OF MAJOR AND MINOR INFRINGEMENTS (CONSOLIDATED)	2025	2024	2023	2022
Business Responsibilities	22	35	44	59
Social Responsibilities	51	99	86	96
Environmental Responsibilities	4	10	3	7

Pipeline Integrity Programme

Pipeline Integrity (PI) is our third-party assured programme focused on the implementation of rigorous management systems, controls, such as training, documentation, procedures and policies, that help to demonstrate that the relevant diamond pipelines are fully segregated, tracked and traced, and contain only eligible diamonds.

Evidence of how eligible diamonds are tracked through the value chain from rough to polished until the relevant end point is underpinned by the De Beers Diamond Pipeline Integrity Specification 001:2025. Only participants who have been successfully assessed against the Diamond Pipeline Integrity Specification 001:2025 and who demonstrate compliance with the BPPs are eligible to participate in De Beers Provenance Programme activities.

[13] Infringements can be either Major or Minor and indicate where an issue has been identified that does not meet the BPP requirements and Corrective Action is required. Minor Infringements are where Corrective Action can be taken within a reasonably short time period. Major Infringements are imposed for more serious compliance issues and require Corrective Action to be taken within the BPP Cycle.

While PI is predominantly an assurance programme focused on the segregation of eligible and non-eligible diamonds, the audit framework sits alongside, and requires participants to comply with, the BPPs. This means that, during PI only audits, the auditors will also verify that entities consistently uphold the BPP requirements relating to financial offences, Kimberley Process and System of Warranties, child labour, forced labour, human rights, employment, and health and safety. The standard includes an obligation on authorised De Beers Provenance Programme participants to participate in the BPP Programme, in addition to requirements from a responsible business practices perspective, including supplier due diligence relating to modern slavery risks.

PI participants must disclose all entities, including contractors, within their group handling eligible diamonds and are subject to an annual PI third-party verification.

In 2025, no instances of forced labour or issues relating to modern slavery requirements, or related risks, or child labour were identified through the PI Programme.

Responsible Sourcing of Diamonds, Precious Metals, Minerals and Gemstones

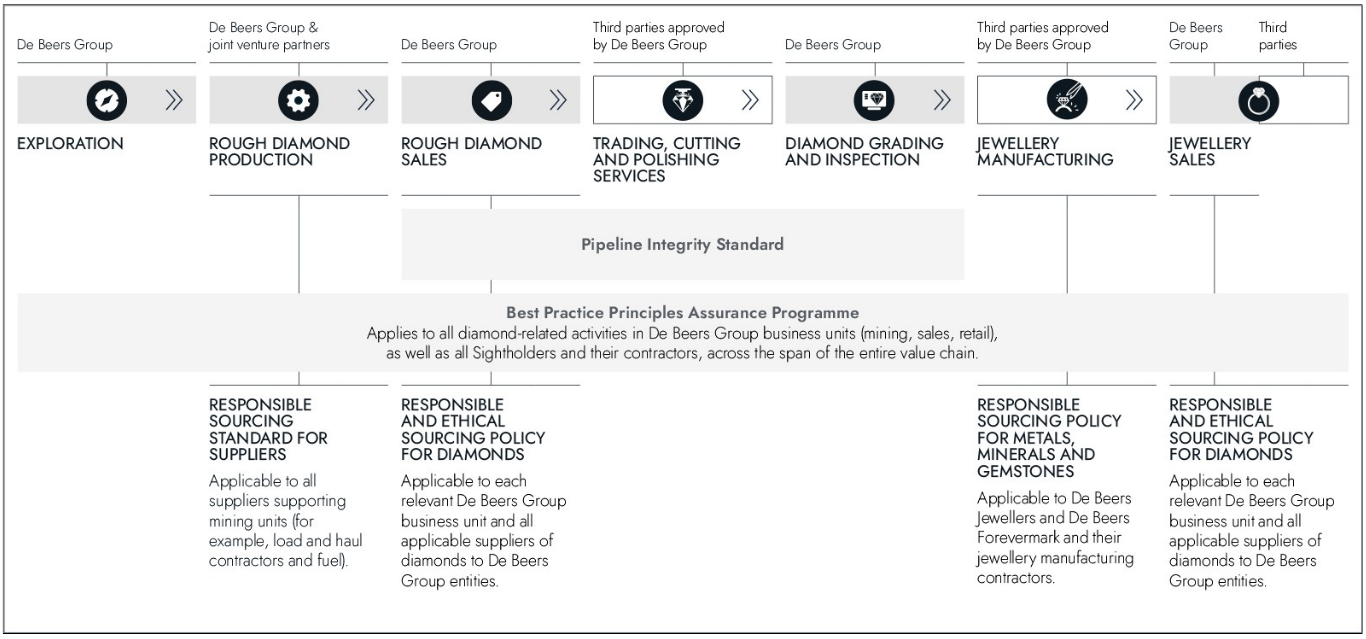
All diamonds and precious metals, minerals and other gemstones sourced by the De Beers Group's business units must meet our robust responsible sourcing practices, which require human rights due diligence to be undertaken on relevant suppliers. This is to provide assurance that the diamonds, metals, minerals and gemstones used in our jewellery have not been sourced in ways which give rise to concerns of human rights impacts, conflict and modern slavery.

These practices are governed by our Responsible and Ethical Sourcing Policy for Diamonds and our Responsible Sourcing Policy for Metals and Minerals which are fully aligned to the OECD Guidance. Both policies are designed to ensure that risk-based due diligence is undertaken for all sourcing activities of diamonds and other metals, minerals and gemstones to help identify, mitigate and address key risks, including on human rights (including modern slavery), as they have been identified in the OECD Guidance. The policies set out fundamental principles which are applicable to all our diamond-sourcing business units and include, but are not limited to, our position that we do not tolerate any form of torture, cruel, inhuman and degrading treatment, compulsory or forced labour, including child labour, and gross human rights violations in the sourcing of our diamonds, precious metals, minerals and other gemstones.

A key focus in 2025 has been to continue working alongside our De Beers Group entities to support the implementation of the policies, and, where necessary, the required assurance protocols and procedures.

- For our downstream (retail) brands, the focus has been on training the relevant teams and obtaining the required assurances that relevant suppliers and jewellery manufacturers are compliant with the relevant sourcing requirements, including implementing a procurement decision-making process to assess whether rough and/or polished (natural) diamonds can be accepted into our supply chain.
- De Beers endeavours to ensure that, when exceptional diamonds (as defined) are sourced, there is a clear, risk-based due diligence process to evidence that they come from sources that meet our applicable standards. This review incorporates extensive due diligence to help ensure that any potential or actual human rights risks, including those related to modern slavery associated with the third-party producers or mines from which we source exceptional diamonds, are promptly identified.

Our Group is further committed to transparency efforts that help to ensure, and evidence, confidence in our diamond, metal, mineral and gemstone sourcing across the diamond and jewellery value chains. Therefore, we published our progress on the implementation of our policies across the relevant parts of the Group in the 2025 'Building Forever, our Sustainability Report', available here.



Voluntary Principles on Security and Human Rights

Security is critical to our business, in particular because of the high value of diamonds. We are signatories to the Voluntary Principles on Security and Human Rights (VPSHR), which guide our alignment with human rights best practice when addressing any security-related issues. Security personnel and private contract security personnel receive training in how to respect human rights. Our in-house security and human rights training curriculum covers all aspects of the VPSHR and is accessible via our e-learning application and face to face. In addition, the core elements of our in-house training are incorporated into our Security Induction at all operations, including all managed and non-managed operations, including corporate offices and sites.

All private contract security entities are required to comply with the VPSHR, and their personnel are subject to the same training as our own security personnel. We regularly interact with public security bodies as part of our stakeholder engagements, and those discussions include our alignment with the VPSHR.

The Anglo American Social Way Policy requires that security-related risks and impacts are assessed and managed in accordance with the VPSHR, and IFC Performance Standard 4 on Community Health, Safety and Security.

UPDATE ON PROGRESS

We maintained our strong human rights due diligence process during 2025 to comply with the VPSHR. This included promoting awareness of the key principles of the VPSHR through cross-functional training and conducting robust risk assessments to identify and address security-related human rights risks at our relevant operations.

As part of the Anglo American Social Way 3.0 framework (about which see more below), our managed and non-managed joint venture land based mine sites undertook annual Social and Human Rights Impacts and Risks Assessment (SHIRA) workshops that further expanded on human rights matters across the upstream natural diamond pipeline, with concerted, cross-functional efforts to identify data gaps with regards to impacts and risks, including in the security sphere. The application of a human rights lens continues to strengthen our governance process across our business.

At our Upstream Operations

Anglo American Social Way 3.0

The Anglo American Social Way is our social performance management framework for our land-based mining operations. It sets out the requirements each mining site needs to implement on an ongoing basis to identify and address social performance impacts and risks. The Social Way explicitly links effective social performance with respect for human rights. This is embedded into its requirements (specifically those related to social and human rights risks and impact assessment, stakeholder engagement, understanding and addressing concerns of vulnerable groups and addressing grievances) and in our work with contractors, including our approach to security.

The Anglo American Social Way Toolkit contains detailed guidance on the standards, processes and procedures required for effective social performance and implementation of the Anglo American Social Way Policy. It provides guidance on how to conduct a SHIRA, which incorporates the 'principles and objectives' of human rights due diligence as set out in the UNGPs. One of the categories of impacts that are included in the SHIRA process is impacts on personal and political security, which includes impacts on the right to freedom from slavery and forced and child labour.

Community engagement and local accountability are central to the Anglo American Social Way. This sets out requirements for stakeholder engagement in support of SHIRA and the management of grievances and incidents in human-rights related matters, including community health and safety, livelihoods and job creation, access to education, land access, displacement and resettlement.

UPDATE ON PROGRESS

Our updated social performance management framework, Anglo American Social Way 3.0, for our land-based mining operations, was launched in January 2020. The Social Way sets mining-specific standards, and includes compulsory requirements specifically related to human rights due diligence, including:

- Requirement 3B, Incident and Grievance Management
- Requirement 3C Social & Human Rights Risk and Impact Analysis (SHIRA) (annual), including impacts on personal and political security, including the right to freedom from slavery and forced child labour
- Requirement 4E Voluntary Principles on Security and Human Rights

Across the Group, Social Way 3.0 remains the framework for managing social performance and social risk oversight. All operations continue to demonstrate disciplined implementation through annual self-assessments, structured Social Management Plans (SMPs), and strengthened governance mechanisms, supported by the Social Way Toolkit.

Implementation across the De Beers Group remains strong, with operations meeting or exceeding compliance thresholds. Performance improvements have been driven by enhanced governance, maturing risk and impact management processes, strengthened stakeholder engagement, and improved alignment between social performance and business planning.

In 2025, no mandatory Social Way assessments were required. While not all sites undertook full self-assessments, several operations progressed priority components of the Social Way Management System and conducted targeted reviews of selected requirements. These activities focused on site-specific priorities and resulted in the following outcomes:

Managed Entities

- Venetia: In 2025, Venetia established a 5-year Social Performance Strategy supported by an annual Social Performance Implementation Plan. Together, these constitute the Social Management Plan (SMP)—the central instrument outlining the mine's Social Way priorities, management processes, and commitments. The SMP is informed by a structured assessment of internal and external contexts, including social risks, impacts, issues, and alignment with business objectives.
    - Venetia completed its Social Way self-assessment in Q4 2025, achieving 91% progress toward full compliance (against a 90% target). This performance was enabled by early milestone setting and monthly oversight through the Social Performance Management Committee (SPMC).

- Gahcho Kué: Gahcho Kué continues to integrate the principles and requirements of the Social Way in addition to the requirements of the regulatory frameworks of the Northwest Territories, ensuring that social performance obligations are implemented in a manner consistent with both corporate standards and territorial legislation.
    - In 2025, Gahcho Kué completed its Social Way self-assessment and achieved 100% performance against all priority targets set for the year. The operation met every target established for 2025, attaining Level 3 across all Social Way requirements except for Community Health and Safety Management (Requirement 4C), which achieved Level 2 in line with the site's planned target.

Non-Managed Entities

Namdeb: Although the Social Way has not yet been formally adopted as a mandatory policy for Namibia Land, it is being applied as a best practice framework to enhance social performance. In 2025 the following achievements were delivered in line with Social Way 3.0 requirements and assurance expectations:

- Strengthened Commitments Management: Completion of the review and rationalisation of the commitments register to improve clarity, ownership, and alignment with Social Way accountability requirements.
- Enhanced Grievance and Incident Processes: Development of a monitoring and evaluation framework for grievances and incidents, supporting more consistent tracking, analysis, and response in line with Social Way protocols (Requirement 3B).
- Advancement of Social Performance Planning: Continued development of the Social Management Plan for a strategic contract, currently in circulation for internal review, strengthening proactive identification and management of social risks and opportunities (Requirement 3C).
- Human Rights and Security Alignment: Progress on the Voluntary Principles and Human Rights Plan for Security, now awaiting final sign-off, demonstrating ongoing compliance with Social Way expectations on responsible security (Requirement 4E).
- Cultural Heritage Stewardship: Ongoing development of the Cultural Heritage Management Plan, nearing finalization, in support of Social Way requirements for the protection and responsible management of cultural heritage.

Debmarine Namibia: In 2025, Debmarine advanced this work by finalising the Incident Management Procedure to fully enhance the identification, reporting and assessment of incidents with potential social consequences. In parallel, an internal review of the Social Grievance Management Procedure is underway. Once approved it will enable full alignment with the Social Way requirements for transparent, accountable and accessible complaints management. No social incidents were recorded during the 2025 reporting period.

Debswana: In 2025, Debswana achieved a Social Way performance score of 95%, exceeding both the target of 88% and the stretch target of 93%. This reflects consistent improvement in the implementation of the Social Impact Management System, supported by strong leadership oversight, robust social risk and impact management practices and effective stakeholder engagement processes. Social Impact and Socio-Economic Development strategies are fully aligned with business objectives through a structured approach to risk and impact management. Social impact considerations are embedded within the Life of Asset Plans, with progress routinely reviewed through the Social Impact Management Committees.

Key opportunities moving forward include advancing continuous learning, improving responsiveness to contextual changes, and further embedding Social Way requirements across core planning and operational processes. Looking ahead to 2026, the Group anticipates the finalization and formal approval of the updated Anglo American Social Way Policy, initiated in 2025. This update and the evolution of the framework into a Social Way Standard, supported by a Practitioner Toolkit, aim to deliver a more coherent, efficient, and risk-based social performance system. The enhancements are expected to strengthen business value, build community trust, and improve operational resilience, while reducing administrative burden of the current Social Way framework.

At our Midstream Operations[14]

GemFair Responsible Artisanal and Small-scale Mining Assurance Programme

GemFair, which sources rough diamonds from artisanal and small-scale mining (ASM) miners, continues to use its own GemFair Responsible ASM Assurance Programme for responsible sourcing, which draws its structure, scope and intent predominantly from the:

- OECD Guidance
- BPP Programme
- Alliance for Responsible Mining and RESOLVE's CRAFT Code

GemFair's Responsible ASM Assurance Programme comprises a group of policies, procedures, standards and training fulfilling the OECD Guidance requirements for responsible sourcing in mineral supply chains. These include, but are not limited to, GemFair staff undertaking mine site spot checks to minimise the risk of forced labour, human trafficking, human rights violations and child labour, and offering training to workers on environmental stewardship and safety, among other mining and business standards. Any observation or verified reports of the above material issues would lead to GemFair's disengagement from the artisanal miner who runs the mine site in question. GemFair also undertakes KYC due diligence on potential and existing suppliers.

The GemFair ASM Assurance Programme follows the OECD Guidance Five Step Framework for due diligence, working to ensure that artisanal miners selling into the GemFair programme maintain best practice for human and worker rights. GemFair also works closely with participating artisanal diamond miners to help them to put in place good standards of environmental management, and health and safety. GemFair has a permanent buying office in Sierra Leone, and a national team in charge of the on-the-ground delivery of the programme, such as onboarding miners, carrying out background checks and visiting sites to monitor compliance.

In addition to the Responsible ASM Assurance Programme, GemFair:

- Distributes a Fair Mining Policy to miners which includes a section on forced labour and human trafficking. In addition, miners receive training on these topics.
- Requires each participating artisanal diamond miner to sign a self-declaration to adhere to GemFair's Core Requirements[15], which include human rights and forced labour standards.
- Has developed a Responsible Sourcing Policy for Diamonds to demonstrate its commitment to following the five-step framework as articulated in the OECD Guidance. The policy details how GemFair seeks to address supply chain risks (including modern slavery risks) related to sourcing ASM diamonds.
- Investigates any suspected breach of GemFair's Core Requirements or other relevant policies and procedures.
- Convenes GemFair's Assurance Committee, a minimum of once per year, to discuss GemFair's response mechanisms to breaches.
- Regularly sensitises artisanal diamond mining suppliers to the GemFair ASM Standard Requirements and other aspects of the GemFair Responsible ASM Assurance Programme, and updates elements of GemFair ASM Assurance Programme documentation to reflect evolving best practice, new regulation and to promote continuous improvement.

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[14] Only Charterhouse CAP Ltd met the reporting threshold for FY2025 within our midstream operations. Charterhouse CAP Ltd is therefore included within the scope of this Statement. Lightbox Jewelry Ltd, which also met the threshold for FY2025, ceased trading in 2025. However, because it met the threshold during FY2025, its relevant activities for that period are reported within this Statement.

[15] The GemFair Responsible ASM Assurance Programme's Core Requirements include: Human rights, no forced or child labour, no direct or indirect support of non-state armed groups, non-discrimination, anti-money laundering and terrorism financing, traceability, business integrity and ethical standards. For more information on the GemFair ASM Standard, visit https://www.gemfair.com/our-assurance-programme/.

GemFair's programme is verifiable, and its due diligence management system is third-party assured by SGS, which includes auditing a sample of mine sites selling to GemFair. The first GemFair Assurance Programme audit took place in 2019, and subsequent audits took place in 2020, 2022, 2023, 2025 and one is scheduled for quarter 2 of 2026.

UPDATE ON PROGRESS

In 2025, GemFair continued to monitor modern slavery risks in its supply chain. This included:

- Mine site assessments: Mine site assessments carried out by trained field officers to monitor for human rights/child labour/forced labour issues at participating mine sites. The field team undertook 1,102 mine site assessments in 2025.
- Background checks: GemFair conducted background checks on every new artisanal diamond miner joining the programme to help ensure that GemFair does not engage with individuals on sanctions lists, with a total of 181 new background checks in 2025.
- Training: After onboarding, GemFair artisanal diamond suppliers receive training on GemFair's Core Standards, which cover modern slavery risks and how they may manifest at artisanal mine sites. In 2025, 442 miners participated in GemFair's Core Training course.
- Roll-out of revised GemFair Assurance Programme to new and existing artisanal diamond miners selling diamonds into the GemFair programme. The GemFair team provided training on the updated standards both in the classroom and at participating artisanal mine sites.

De Beers Auctions Botswana Proprietary Limited

De Beers Auctions predominantly sells rough diamonds sourced from our managed and joint venture mining operations. However, it may also source third-party rough diamonds from approved producers, in line with our Responsible Sourcing Policy for Diamonds.

UPDATE ON PROGRESS

De Beers Auctions continues to follow our Responsible Sourcing Policy for Diamonds.

In 2025, De Beers Group Auctions did not make any third-party purchases. All diamonds acquired for sale were sourced exclusively through De Beers Group Global Sightholder Sales.

At our Downstream Operations (Forevermark and De Beers London)[16]

As articulated in our Responsible Sourcing Policy for Diamonds and Responsible Sourcing Policy for Metals and Minerals, our consumer brands, De Beers London (DBL) and Forevermark, adhere to a strict set of Fundamental Principles, aligned to the OECD Guidance, when undertaking any sourcing activities in accordance with the aforementioned policies. These two policies combined reflect the significance and importance we place on our downstream diamond operations managing and mitigating risks related to the sourcing of diamonds and other precious metals and minerals.

De Beers London (DBL)

In alignment with both Responsible Sourcing Policies, DBL's core diamond suppliers and jewellery manufacturers are required to comply with our strict ethical and sourcing criteria, as follows:

- All core white diamonds are sourced from De Beers Group's managed and joint venture operations, and all suppliers of this category of diamonds are required to be compliant with the BPP Programme and PI Programme (more information on both programmes can be found above).

[16] No downstream entities met the Section 54 threshold for FY2025. This section is included to provide transparency on our broader responsible sourcing practices across the Group. Lightbox Jewelry Ltd, which previously operated within the downstream segment and met the threshold for FY2025, ceased trading in 2025.

- In special circumstances, DBL may source exceptional diamonds from other approved sources. All approved sources are selected based on robust ESG criteria, including those relating to human rights, forced labour and risks of modern slavery. Strict due diligence on the supplier's integrity and diamond sourcing practices is also in place for approved sources, including due diligence aligned with the OECD due diligence framework.

UPDATE ON PROGRESS

All jewellery manufacturers for DBL are required to be compliant with either the BPP Programme or certified against the RJC Code of Practices.

- In 2025, 100 per cent of our jewellery manufacturers met this criterion, with 7 per cent participating in the BPP Programme and 93 per cent being RJC-certified.

In terms of its platinum sourcing, over the course of 2025, DBL aimed to source an increasing amount of its newly mined platinum from Anglo American Platinum; the remainder of DBL's sourcing of platinum in 2025 was from recycled sources.

Forevermark

All Forevermark Diamantaires are Sightholders and therefore participate in the BPP Programme. They are also required to participate in the PI Programme.

As of 1 January 2023, all Forevermark diamonds inscribed with the Forevermark logo originate in rough form sourced exclusively from our Group's managed or joint venture diamond mining operations.

UPDATE ON PROGRESS

The primary objective for 2025 was to require that Forevermark jewellery manufacturers consistently adhere to the rigorous ethical standards specified in our Responsible Sourcing Policy for Metals and Minerals, including participation in the BPP Programme for those not holding RJC certification.

- In 2025, three new jewellery manufacturers for Forevermark India were onboarded to our BPP Programme. All three of these jewellery manufacturers are certified against the RJC Code of Practices.

At our Other Businesses[17]

Element Six

Element Six continues to uphold its commitment to responsible sourcing and ethical business conduct, including adherence under the EU and US conflict mineral regulations which seek to prevent the financing of armed groups and the sourcing of minerals tin, tantalum, tungsten, cobalt and gold from mines using forced labour or engaging in human rights abuses. Element Six's Conflict Minerals Policy can be viewed here.

UPDATE ON PROGRESS

Building on the significant progress made in 2024, Element Six continued to strengthen its supply chain due diligence practices. The centralised vetting process introduced in 2024 for suppliers and customers is now embedded across the business, enabling continuous and more consistent screening, including the assessment of modern slavery and human rights risks.

[17] The activities described in this section reflect the Group's broader responsible sourcing and due-diligence practices. Only Charterhouse CAP Ltd and Lightbox Jewelry Ltd met the Section 54 threshold for FY2025. The Lightbox business ceased trading in 2025, however, its FY2025 activities remain within the scope of this Statement. Element Six, Tracr and the Institute of Diamonds did not meet the threshold for FY2025 and are included here for transparency.

In addition, in 2025 Element Six directly engaged with its critical raw material and production consumables suppliers to confirm that they have formal company policies relating to modern slavery risk management. These suppliers were asked to attest to their commitments to preventing forced labour and upholding responsible business practices throughout their own operations and supply chains.

Furthermore, Element Six maintained its programme of independent third-party audits of its tungsten carbide suppliers. The annual audit again reported no concerns regarding supplier practices, providing ongoing assurance that our sourcing activities are conducted in line with international expectations and our internal standards.

Tracr

Tracr engages with platform participants that are active in various stages of the diamond value chain, to help identify, assess and respond to human rights and modern slavery risks. As part of its onboarding and participation requirements, Tracr undertakes counterparty due diligence, including Know Your Customer and Anti Money Laundering screening, supported by third-party tools to identify sanctions exposure, adverse media or other integrity concerns that may indicate heightened modern slavery risks.

Across the midstream, Tracr platform participants include Sightholders, who are already subject to De Beers Group's existing due diligence and assurance processes. Participation on Tracr also extends to third party producers and midstream businesses, who are required to be RJC members or to comply with the requirements of the BPP Programme. Both frameworks include standards relating to human rights, forced labour and modern slavery, and therefore require that participants maintain responsible sourcing practices within their own operations and supply chains, including identifying and mitigating against potential modern slavery risks in their participants' operations and those of their suppliers.

UPDATE ON PROGRESS

Tracr's process for managing modern slavery risks remains unchanged.

In 2025, Tracr continued to advance its ability to support single country-of-origin data, with all diamonds over one carat registered on Tracr being able to be traced in this way. Shifting geopolitical events and changing import restrictions on diamonds of different origins continue to highlight the need for comprehensive, industry-wide diamond traceability.

Institute of Diamonds (IoD)

The Institute of Diamonds' services are offered to diamantaires across the diamond industry. Whilst the IoD does not take ownership of any diamonds it receives, many of its customers are Sightholders who therefore fall within existing De Beers due diligence processes, which seek to identify and respond to modern slavery or human rights risks.

UPDATE ON PROGRESS

The process adopted by the IoD for managing modern slavery risks remains unchanged.

Potential customers that are not Sightholders are required to provide the IoD with relevant corporate information so that due diligence checks can be conducted. This information is input into third-party screening platforms which identify red flags, including those relating to modern slavery and human rights. Only upon these checks being completed will the IoD move forward with a view to offering its services to a prospective customer.

Beyond our Business

Supply Chain Management

The products and services that are used to support our global upstream mining operations are predominantly sourced in Botswana, Canada, Namibia, and South Africa, in recognition of the importance we place on helping to develop and maintain thriving and healthy host communities. Additionally, we are committed to working with suppliers who comply with applicable laws. This commitment underpins our aims to work with responsible suppliers whilst remaining committed to supporting suppliers to help them identify and manage sustainability issues such as those relating to safety, human rights, modern slavery, and workplace conditions.

Our supplier base is wide and diverse, comprising a growing number of small and medium-sized localised suppliers in the countries in which we have operations. Procurement of goods, labour and services available in our countries of operation is of strategic importance to us because it plays a key role in helping to develop thriving and healthy host communities.

The De Beers South Africa business recorded a reduction in addressable spend in 2025, driven by ongoing initiatives to streamline operations and achieve sustainable overhead cost savings through a range of efficiency measures. Despite this decline, inclusive procurement — prioritising Black-owned, women-owned, youth-owned, and host community enterprises — remained a central strategic focus. Inclusive procurement performance decreased marginally from 84% in 2024 to 83% in 2025, measured against the respective addressable spend. This slight reduction is largely attributable to the lower overall addressable spend; however, the business continues to uphold its commitments to the Mining Charter requirements and broader social contribution obligations within host communities.

This focus on inclusive procurement directly supports our human rights and modern slavery risk-mitigation objectives. It promotes equality and inclusion for disadvantaged groups by supporting fair access to jobs and procurement opportunities. It also contributes to skills development, decent work and broader poverty-reduction outcomes. In addition, strong governance and due-diligence processes, strict controls on subcontracting and partnerships, clear expectations for ethical leadership, fair and timely payment practices and accessible whistleblowing channels all assist in preventing exploitative practices and encourage transparent, ethical supplier behaviour across our supply chain.

In 2025, De Beers procured goods and services exceeding $549 million from more than 1,738 suppliers in South Africa and 552 suppliers in Canada.

UPDATE ON PROGRESS

The De Beers Group Supply Chain function actively supports the Anglo American Supply Chain function's journey to 'Innovate Supply, Responsibly' which focuses on outcomes relating to safety, people, sustainability, value delivery and digitisation. All De Beers Group suppliers[18] are expected to adhere to the requirements of the Anglo American Responsible Sourcing Standard.

Fundamental to this approach is the prioritisation of ethical decision-making when purchasing goods and services. This prioritisation is embedded within the Anglo American Responsible Sourcing Standard alongside five key expectations for suppliers:

1. Protect safety and health
2. Protect the environment
3. Respect labour and human rights
4. Increase social accountability
5. Conduct business fairly and with integrity

[18] Suppliers describes all providers of goods and services to Anglo American and its subsidiaries - this includes all agents, traders, contractors, consultants and other forms of intermediaries.

The Responsible Sourcing Programme focuses on selecting suppliers annually to assess their compliance with applicable laws and fair and transparent business practices. Suppliers are selected to participate in the programme based on spend, impact on host communities and/or other risks which may arise from contractors with a large staff complement. In 2025, as part of the Anglo American Responsible Sourcing Programme, De Beers Group issued 342 self-assessment questionnaires (SAQs). Of these, 89.5% were South Africa based suppliers to Venetia mine, and 10.5% were to high-value Canada-based suppliers to Gahcho Kué mine.

The requirements contained in the Anglo American Responsible Sourcing Standard reflect our commitment to fair and transparent business practices and we engage with suppliers to support them in seeking to manage those risks. Engagement with suppliers will continue in 2026 to support our work to monitor and manage changes within our upstream supplier risk profile and to identify any new risks that may emerge because of these changes.

Update on De Beers Group Supply Chain programme in 2025:

- Utilising the Informed365 platform, 342 suppliers were invited to complete the Anglo American self-assessment questionnaires (SAQs).
- Risk analysis is scheduled for Q1 in 2026 from the results submitted by the suppliers for the 2025 cycle.
- If a supplier is identified as a high risk, De Beers Group would engage with the supplier to help address the risks identified and support the implementation of a Corrective Action Plan (CAP). Tracking of actions would take place with possible onsite audits where required.
- Based on 2023 spend data, 16 suppliers were identified to participate in Responsible Sourcing Audits. This process started in Q4 2024, and 9 Audits were conducted by external third-party auditors in 2025. The results from completed SAQs confirmed that large spend suppliers understand responsible sourcing risk areas and have established practices to manage key risks, including those related to human rights and modern slavery. In addition, key findings showed that there is a requirement for modern slavery awareness training for Small, Medium and Micro Enterprises (SMME) suppliers.

To further mitigate the possibility of human rights violations, we have continued with human rights and security checks for suppliers:

- Due diligence processes are applied to all new upstream operations suppliers which are aligned to the Anglo American Responsible Sourcing Standard for Suppliers. These due diligence verifications include trade sanctions and responsible sourcing checks, encompassing child labour and modern slavery checks, through an independent third-party that conducts the screening and compliance verification for all new upstream mining suppliers. This means that all potential new suppliers are adequately screened, and contracts will only be entered into upon the successful completion of these checks.
- The same due diligence processes were also applied to De Beers Group's top 300 suppliers, based on spend. This exercise is conducted every 3 years.
- In 2025, nine suppliers were audited by an Anglo American nominated external social auditor and, where necessary based on the outcomes of the audit, CAPs with realistic timeframes for monitoring and close out of issues identified were requested from them. The purpose of the CAPs is to require that any supplier non-conformances that may impact our Group are proactively remedied before a risk event can materialise. This helped to ensure that potential risk events are managed and mitigated accordingly.

TRAINING

Initiatives available in 2025 to relevant employees, contractors and counterparties in the diamond and (where relevant) synthetic diamond and supermaterials value chains relating to the management of modern slavery risks included the following:

Human Rights Training:

In 2025, human rights content was delivered via the Learning Management System (LMS) and is embedded within broader mandatory courses and recorded at whole-course level. As a result, human rights e-learning hours and completions cannot be separately disaggregated and are included within total e-learning hours and total employee completions. In 2025, the total number of group e-learning employees was 4,454.

Best Practice Principles Training:

In 2025, online live training was provided to existing and new BPP Programme participants, including our own business units and our third-party auditors. This included training to provide comprehensive guidance on how to implement new and existing (for new participants) requirements in the BPP Programme.

GemFair Training for ASM Miners:

In 2025, GemFair rolled out fourteen training sessions on responsible artisanal mining standards (such as human rights, child labour and forced labour prevention), diamond valuation fundamentals and the GemFair traceability solution. Please see our annual GemFair Way report for further information.

Training on Voluntary Principles on Security and Human Rights:

In 2025, training was provided to a total of 1077 individuals, comprising 897 online training sessions and 241 face to face training sessions, (a total of 1415 took place in 2024). The training was delivered to employees, privately contracted security personnel and members of police services, utilising both in-class and e-learning formats across all of our operations.

Shift Training:[19]

In 2025, Shift held several sessions with the De Beers Ethical Initiatives Team, to assess how the BPP Programme addresses human rights impacts. This saliency assessment included a dedicated focus on modern slavery risks, with more detailed work planned on this topic for 2026.

[19] Shift is a leading centre of expertise on the UN Guiding Principles on Business and Human Rights. Shift is a non-profit, mission-driven organisation headquartered in New York City.

PLANS TO STRENGTHEN OUR APPROACH IN THE FUTURE

We intend to take the following actions to further strengthen our approach to managing human rights risks, including modern slavery, across our Group and throughout our supply and value chain in 2026.

Across our Group and Value Chain

Our key aims for the 2026 BPP cycle include:

- Implementation of the updated BPP requirements will commence in the 2026 cycle, following the comprehensive review completed in 2025 to ensure alignment with industry best practice and evolving regulatory expectations. This review incorporated the newly published RJC 2024 Code of Practices, including strengthened human rights due diligence requirements applicable to all BPP participants, encompassing both De Beers Group businesses and third-party participants. Our Responsible Sourcing Policies for Diamonds and for Metals, Minerals and Gemstones will continue to be refined as appropriate in light of prevailing ethical standards and international guidance. We will work closely with relevant business units to support consistent and effective implementation of these policies across our operations.
- A more targeted audit regime will be implemented, building on our existing risk-based approach and focusing assurance activities on jurisdictions and operating contexts identified as higher risk through our annual human rights and modern slavery risk assessment. This approach is expected to enable a more proportionate, risk-responsive oversight and more effective mitigation.

At our Upstream Operations

Anglo American Social Way 3.0

An update to the Anglo American Social Way Policy was undertaken in 2025, along with the evolution of the Social Way into a Standard supported by a Practitioner Toolkit. This enhancement is designed to provide a more coherent, efficient, and risk-based social performance framework that strengthens business value, builds community trust, and supports sustainable, resilient operations. The intention is to replace the administrative requirements of the current framework with greater clarity, strategic focus, and a continuous-improvement approach.

The updated requirements are currently progressing through the internal approval process, with final approval expected in Q1 2026. Following approval, a structured Group-wide communication and change-management programme will be rolled out across the remainder of 2026 to support effective adoption of the updated Standards and Practitioner Toolkit.

At our Midstream Operations

GemFair

In the year ahead, GemFair plans to continue embedding the key updates to the GemFair ASM Assurance Programme, by taking training and awareness-raising to its relevant mining communities. GemFair will also participate in an annual Assurance Programme audit, which assesses the Programme's alignment with the OECD Guidance. Where the auditor recommends improvement opportunities, such as raising awareness with artisanal mine workers about their human rights, GemFair will prioritise their implementation.

At our Downstream Operations

De Beers London

- During 2025, De Beers undertook an extensive review of the Responsible and Ethical Sourcing Policy for Diamonds as well as the Responsible Sourcing Policy for Metals, Minerals and Gemstones in light of international best practice, emerging regulatory expectations, and the evolving risk landscape. This review included a detailed assessment of policy content, governance structures, and implementation mechanisms, supported by a series of awareness and capacity-building sessions to prepare teams for the updated requirements.
- The revised policies will be formally published in 2026 and disseminated to all relevant business units. The updated policies will form a core component of our responsible sourcing governance framework and will underpin our ongoing efforts to uphold high ethical standards throughout the business.
- Training on both policies will be delivered to all new and existing team members involved in the sourcing of materials for De Beers London's finished goods. This training will encompass the ethical, legal, and operational requirements that govern the procurement of diamonds, metals, minerals, and gemstones, as well as the expectations set out in our broader responsible sourcing framework.

Forevermark

- All new jewellery manufacturing contractors supporting the Forevermark retail business in India will be formally onboarded as part of our strengthened responsible-sourcing oversight. This process requires that all jewellery manufacturers operate in accordance with the Responsible and Ethical Sourcing Policy for Diamonds and the Responsible Sourcing Policy for Metals, Minerals and Gemstones, as well as the broader human rights and due diligence expectations embedded within the BPP framework.
- This approach reinforces our commitment to requiring that all sourcing for the Forevermark brand is produced in alignment with applicable best practice.

Element Six

Responsible sourcing and the protection of human rights continue to be core priorities for Element Six. To reinforce this commitment, the company will undertake a comprehensive review and update of its Human Rights Policy and Responsible Sourcing Policy in 2026 in light of evolving best practice.

Beyond our Business

Upstream Supply Chain

The objectives for responsible sourcing for the upstream supply chain have been maintained with the existing De Beers Supply Chain governance processes. From the onboarding of our suppliers to the contracts negotiated, extensive reviews have been conducted on our suppliers to support compliance with the Anglo American Responsible Sourcing programme.

De Beers Group