

Security Services and Human Rights Policy

1. Purpose

To ensure the De Beers Family of Companies provides legitimate security for its employees, information and assets without adversely affecting the human rights of either its employees or people living in communities close to company operations. Whilst the principles contained herein are subject to national laws, ethical best practice and internationally accepted human rights are to be adhered to as a minimum at all times.

2. Scope

This policy will apply to employees and contractors at every level of De Beers majority owned and managed companies. All companies in the De Beers Family of Companies which are not majority owned or managed are strongly encouraged to adopt the principles contained in this policy.

3. Guiding Principles

The maintenance, revision and distribution of this policy are the responsibility of the Security Principal De Beers Group Services, Technical Leadership. In order to protect the inherent human rights of its employees and the communities in which it operates, the De Beers Family of Companies subscribes to the following principles:

- The security of employees, business partners, customers, diamonds, buildings and property is paramount to De Beers.
- All private security services deployed by De Beers shall be governed in strict accordance with local and international law.
- Before being hired, security services organisations or individuals that are hired as employees to perform security services, should be evaluated for any credible prior involvement in human rights abuses. All contracts with security services will state that involvement in human rights abuses will be reason for contract termination.
- Security services organisations hired by De Beers, or on behalf of De Beers, should provide a statement that "individuals credibly implicated in human rights abuses do not provide security services under the contract". Individuals hired as employees to perform security services are required to make declarations necessary to demonstrate no previous involvement in human rights abuses.
- Security services organisations hired by De Beers, or on behalf of De Beers, must train staff in how to prevent human rights abuses and how to protect human rights in their area of work as a condition of contract.
- Training and guidance materials will be provided to employees performing security services to ensure clarity about the legality and ethics of the activities they undertake, and to promote respect for human rights as set forth in the Universal Declaration of Human Rights and international humanitarian law.
- No security service hired by De Beers, or on behalf of De Beers, nor any employee working for De Beers in the area of security, should undertake any activity that is illegal or that infringes those human rights set forth in the Universal Declaration of Human Rights and international humanitarian law.
- Security services will not be used in a manner that either forcibly recruits people to undertake work on their behalf or that keeps people at work against their will.
- Assurance audits will be undertaken to evaluate compliance with and effectiveness of this policy, which will include confidential consultation with local stakeholders. Audits will be undertaken through the Principles Assurance Programme. The outcome of audits will be reported to the Audit Committee and through publicly available reports.

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4. Responsible for Policy

The De Beers Group Technical Director – Accountable for adherence to policy

The De Beers FoC Security Peer Group – Responsible for dissemination of policy

This policy must be read in conjunction with:

- Our Purpose, Vision and Values
- Our Principles and DTC Diamond Best Practice Principles
- Related policies, procedures and guidelines established by other Group and Partner companies
- The De Beers Code of Business Conduct and Ethics
- Applicable domestic laws and regulations
- ILO Convention 105 on Abolition of Forced Labour
- ILO Convention 29 on Forced or Compulsory Labour
- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social and Cultural Rights
- The United Nations Basic Principles on the Use of Force and Firearms by Law Enforcement Officials
- The United Nations Code of Conduct for Law Enforcement Officials
- The United Nations Global Compact
- The Voluntary Principles on Security and Human Rights
- Universal Declaration