



13 October 2020

Anneke Van Woudenberg
Executive Director
Rights and Accountability in Development (RAID)
United Kingdom

Dear Anneke,

Re: ALLEGATIONS OF HUMAN RIGHTS ABUSES AT WILLIAMSON DIAMOND MINE

Following our discussions, I am now writing in response to your letter dated 29 August 2020, which alleges certain human rights abuses at the Williamson Diamond Mine (Williamson Mine) over the course of the last few years.

Thank you for bringing these to our attention. As you are aware, Leigh Day is also representing clients who have made allegations in similar terms. I am sure you can appreciate that the existence of those claims and the need to seek advice from lawyers to which legal professional privilege applies, means that I am constrained in the level of detail that I can provide in this letter.

I would like to take this opportunity to reiterate that Petra Diamonds (PDL) takes these allegations extremely seriously. PDL is committed to addressing past and future verified claims of human rights violations and remedying any harm done. I also wanted to thank you for the information you have shared with me thus far and for seeking my response to your findings.

As was discussed on our conference call on the 16th of September, given the claims made as noted above, the PDL Board has commissioned an independent investigation for the purposes of responding to those claims. I do believe, however, that it is important to share with you the following actions taken in the last few weeks:

- Firstly, it is important to the PDL Board that the process to evaluate these matters be carried out according to best governance principles. To this end, a sub-committee of the Board (the Committee), formed entirely of independent Non-Executive Directors, has been established.
- The Committee will be responsible for overseeing the investigation referred to above.
- Whilst the investigation is for the purposes of the legal claims noted above and will therefore be covered by legal privilege, the Committee will consider any required remedy or corrective action to be taken as a result of the investigation's conclusions.

At present, and pending the investigation, the veracity of the claims made is unknown, but in the meantime, and whether or not there is any substance in the allegations, Williamson Diamonds Limited (WDL) has taken the following interim measures:

1. *Voluntary Principles of Security and Human Rights* ("VPSHR") refresher training of all those involved in security at Williamson, namely the WDL security team, the third-party security contractor and local police forces to ensure that the risk of potential future incidents is minimised. This training was initially provided to over 220 people and refresher sessions will be organised on a regular basis going forward. WDL has made clear that it has a zero tolerance policy in relation to threats, harassment and/or intimidation of human rights defenders, local journalists, and other local residents. WDL has and will continue to engage with national and local authorities on the issue,

as well as ensuring that WDL's staff and contractors understand that such behaviour would be in breach of WDL policies and subject to immediate disciplinary measures.

2. *Rolling out of a VPSHR awareness campaign:* this campaign is targeting Petra and WDL executives, as well as the security teams at both Group and mine level in South Africa and Tanzania. The third party security provider at Williamson Mine has also been included in this awareness campaign.
3. *Deployment of a stakeholder engagement expert* at WDL to provide support to the General Manager and other mine leadership in their engagement with the communities and other stakeholders.
4. *The development and roll out of a dedicated and independently managed grievance mechanism,* with the support of the independent consultancy, which will ensure that any stakeholder issues are recorded, responded to and monitored according to the appropriate standards of stakeholder engagement, including addressing any past and future claims of human rights violations.
5. *Suspension of the Mine Chief Security Officer and Support Services Manager at WDL,* pending the outcome of the investigation, and appointment of an interim Security Lead. This measure has been taken as a responsible action whilst matters are being investigated. The interim Security Lead's focus will be to review current practices against applicable policies, including compliance with VPSHR. The interim Security Lead will also lead the engagement with the Tanzanian Police.
6. *Tender process to award a new contract for third party security* at WDL, following the expiry of the current contract.
7. *Closure of the on-site facility that had been used by the Tanzanian Police as a temporary police post* where trespassers on the mine would be detained by the police before their transfer, either to the Maganzo/Kishapo Police station or to Court.
8. *Upgrading of the Mwadui medical facility* is underway to ensure that it continues to provide appropriate facilities, not least to those detained by the Tanzanian Police.

In addition to the above, PDL has updated its *Human Rights Policy Statement*. This was planned for revision this year by PDL's Social Ethics and Diversity Committee. An updated policy statement was approved by the PDL Board on 10 September 2020 and is available at <https://www.petradiamonds.com/about-us/corporate-governance/business-ethics/>.

Lastly, I wanted to reiterate that I will continue to engage with you, and will ensure that any information that you provide relating to the allegations you have listed in your report is passed on to the team that is undertaking the independent investigation mentioned above.

Please do not hesitate to contact me should you require any further details or wish to discuss the matter.

Yours sincerely,



Richard Duffy
Chief Executive Officer