



11 November 2020

Anneke Van Woudenberg

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

Dear Anneke,

WILLIAMSON DIAMOND MINE

Thank you for your letter of 30 October 2020, and for the manner in which you have conducted our ongoing engagements, for which we are grateful.

We note that your letter is addressed to Petra Diamonds Limited (“PDL”) but relates to matters at the Williamson Diamond Mine (“Williamson Mine”), which is owned and operated by Williamson Diamonds Limited (“WDL”). Please note that PDL has requested the assistance of WDL to investigate the issues you have raised.

Further Clarifications

In response to the specific clarifications you have sought, we set out our responses below:

1. *Can you please confirm when the current contract with Zenith Security expires and when it is expected that the new contract for third party security at Williamson Mine will be completed?*

The current Contract expires at the end of December 2020 and WDL aims to have a new security service provider contract in place in January 2021.

2. *Who has been appointed interim Security Lead at the Williamson Mine and what are the oversight measures put in place by both WDL and Petra Diamonds in light of the issues we have raised?*

WDL’s Security Consultant has over 15yrs of Security Management experience including with NGO’s and the UN. Upon his return to Tanzania most recently, he worked in the Oil & Gas industry for several years and managed multiple Sites including maritime security covering offshore exploration operations between Tanzania, Kenya and Madagascar. He also has gained experience in the mining sector in Tanzania.

His scope includes working with social development teams in supporting WDL’s engagement with communities on security and human rights issues, conducting ongoing audits of security policies, practices, procedures and technologies to ensure alignment with best practices and compliance with VPSHR, and engaging with external law enforcement agencies, including on-mine Police Force.

We confirm that PDL is conducting a review of the group-wide security policies which, in turn, are implemented by its subsidiaries, to ensure alignment with best practices and compliance with national and international regulations and industry standards.

Please also refer to our response to your letter in August 2020 for additional information regarding measures which are being implemented.

3. *Could you provide more information on the terms of reference for the community engagement expert, including what steps he/she will be taking to engage communities?*

The scope of the WDL community engagement expert's role is to lead stakeholder engagement, including the provision of high quality and responsive information for stakeholders, and developing approaches to engagement, collaboration, and innovation that create improved value for both WDL and its stakeholders.

Steps Taken/Being Taken:

1. **Development and implementation of a comprehensive Stakeholder Engagement Plan ("SEP").** WDL's SEP demonstrates our commitment to an open and transparent approach in dealing with its surrounding communities including sharing information regarding its operations and their impact. The SEP is focused on community members in the areas surrounding WDL, civil society and NGOs, Communities Development Committees, as well as Government, Police and Community Leaders. It focuses on all issues of relevance to WDL stakeholders, including security and human rights as well as social development.
 2. **Rolling out a dedicated Community Grievance Mechanism** to provide a standard structure through which all complaints and grievances, including serious cases and internal issues are addressed, processed and resolved; and feedback provided in a timely manner to the communities and aggrieved persons or complainants.
 3. **Opening a new, accessible community office and launching a Dedicated Grievance Desk** to accord community members, leaders and anyone with any issues to raise them in a free, unimpeded and open environment. The new offices are located outside the main gates of the company and are clearly designated using signs and writings. The Grievance desk is manned by an individual who is trained in community outreach and has prior experience working closely with mining communities. There are adjacent offices for private conversations. Once in full operation, in addition to interfacing, we have in place plans to provide hotline numbers for calls, messaging and WhatsApp.
 4. **Development and Launching of a new radio program "Kwa Pamoja Tunajali"** (Together we care) which will be broadcasted to all communities around the mine and other stakeholders. The interactive Radio Programs will provide an important platform for both WDL and Communities to engage directly, address concerns collaboratively and as a tool for mass information sharing, our programming will feature Q&A sessions with the WDL General Manager as well as subject matter experts on Grievances and other issues of interest to listeners and communities.
4. *Your letter refers to the closure of an on-site facility used for detention. Is this the same facility referred to in question 14 of our 29 August letter? If so, can you please confirm who owns it, if it was at any time operated by Zenith guards to detain local residents, and the legal basis relied on for such detention?*

The on-site facility that was used for detention has been closed as of 29th September 2020, as set out in our previous letter. It is the same facility mentioned in question 14 of your 29th August letter. The facility was used exclusively by the National Police and was never operated by WDL or Zenith guards.

5. *Can you please explain what the upgrading of the Mwadui medical facility will involve? In particular, will it address the conduct identified in question 21 of our August 29 letter?*

A separate ward (Private Ward) has been selected to accommodate those in detention or in police custody. The private ward stands separate from the common ward, is self-contained with its own toilets and baths facilities. All detainees are now accommodated in the Private Ward without the presence of

a guard in the room or any form of restraints. All security and medical personnel at WDL have been reminded of the procedures in providing care to patients who are detained or in police custody.

Additional Concerns

We are taking the additional concerns you have identified seriously and are investigating these issues as a priority. Although our investigations remain ongoing, we have not identified anything which would substantiate the concerns you have raised. We would be grateful if you could please make available the information at your disposal to allow us to investigate further.

You refer to reports of the detention of an employee of WDL several years ago. I understand that you may be referring to a Government of Tanzania ("GoT") investigation at Williamson Mine regarding commercial matters, which were not related to any human rights issues, and no charges were brought against WDL personnel pursuant to this investigation. Should you require further information in this regard, please take the matter up with the GoT.

I can also confirm that WDL has a Sexual Harassment Policy in place (WDL- HR-21 is attached, as requested).

Finally, I note your reference to the possibility of waiving legal privilege. I am afraid that in the current circumstances of the company facing the threat of litigation this is not something that we are advised to do.

Yours sincerely,

Richard Duffy



Chief Executive Officer

Copy to:

- Hon. Doto Mashaka Biteko (MP), Minister of Minerals, Government of Tanzania

- Hon. Stanslaus H. Nyongo (MP), Deputy Minister of Minerals, Government of Tanzania

- Professor Simon Samwell Msinjala, Permanent Secretary, Ministry of Minerals, Government of Tanzania

- Board of Directors, Williamson Diamonds Limited