

Human Rights Policy

Introduction

Petra Diamonds Limited (“Petra” or the “Company” or the “Group”) is a leading independent diamond mining group and an increasingly important supplier of rough diamonds to the international market. We are committed to the responsible development of our assets to the benefit of all affected stakeholders. We strive to be a safety leader in our industry, a world-class operator, a good corporate citizen and local partner and a best-in-class employer.

We conduct our business in a manner that respects the rights and dignity of all people. This commitment is based on the belief that business should be conducted honestly, fairly and legally.

In developing this Policy, we are guided by the principles of the following human rights standards:

- The Universal Declaration of Human Rights
- The Voluntary Principles on Security and Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- UN Declaration on the Rights of Indigenous Peoples
- Guiding Principles on Business and Human Rights
- Legislation pertaining to human rights in the countries where we operate

Compliance with the above standards means we have zero tolerance for child labour, forced labour or discrimination, and we respect the right of our workers to form unions.

5.1 Human Rights Commitment

- i. Our employees, contractors and suppliers are entitled to work in an environment and under conditions that respect their rights and dignity.
- ii. We expect all employees, contractors and suppliers to share our commitment to high moral, ethical and legal standards, with our Group Code of Ethical Conduct explicitly stating our expectation that Petra employees respect and actively advance human rights.
- iii. We consider the safety and wellbeing of all employees, contractors and stakeholders as our top priority. We are committed to protecting and safeguarding the safety of those who work at or visit our operations.
- iv. We compensate employees appropriately relative to the industry and local labour market. We operate in full compliance with applicable wage, work hours, overtime and benefits laws. The Company prohibits the hiring of individuals under 18 years of age.
- v. Petra employees are treated fairly and without discrimination of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, age, marital status, family status, disability or the receipt of public assistance. In support of this commitment, human rights issues are covered by our operational policies and procedures, with the Company’s Employment Equity Policy and its Disciplinary Code and Procedures expressly forbidding discrimination of any kind.

- vi. We respect freedom of association. Where our employees wish to be represented by trade unions or works councils, we will cooperate in good faith with the bodies that our employees collectively choose to represent them within the appropriate national legal frameworks.
- vii. Our security procedures are in place to protect our people and assets and to provide a secure and sustainable environment in which our business can operate. Our security policies, systems, guidelines and practices are consistent with international standards, including the Voluntary Principles on Security and Human Rights, and the laws of the jurisdictions where we operate.
- viii. We respect the rights of people in communities impacted upon by our activities. We will seek to engage with people in such communities to identify potential adverse human rights impacts and take appropriate steps to avoid, minimise and/or mitigate them.
- ix. We seek to make contractual commitments with suppliers and contractors that encourage adherence to the same high standards of ethical conduct that we expect of all Petra people.

5.2 Implementation

Petra monitors its activities for human rights risks and impacts in order to identify actual and potential human rights issues. Actions to manage and address human rights risks are guided and carried out through dialogue and in collaboration with relevant stakeholders.

Awareness of this Policy among Petra employees and stakeholders is essential to ensure that we meet the goals of this Policy and we therefore communicate our approach to discharge our duty to respect human rights internally and externally. Looking ahead, we aim to provide training to employees on their responsibilities and will incorporate feedback from stakeholders to ensure continuous improvement in our implementation of this Policy. Human Rights training also forms part of the mandatory training provided to personnel in our Security Department.

5.3 Grievance and Dispute Resolution

We seek to ensure that stakeholders who are or could be affected by our activities have access to feedback mechanisms that are legitimate, accessible, timely, equitable and transparent. The approach to resolving disputes and grievances is based on respect, engagement and dialogue with the stakeholders and communities that are affected by us or affect what we do.

5.4 Governance

This Policy will be reviewed every three years and we shall also report annually to stakeholders on the implementation of the Policy Statement by means of feedback in the Annual Report.

Dated: 1 September 2016

APPENDIX

SCOPE

This policy applies to all Petra Diamonds operations to ensure awareness of and compliance to Petra Diamonds' human rights commitments.

RESPONSIBILITY

- The Group HSSE Committee is responsible to update and communicate the Policy.
- Mine Management is responsible to adopt the principles of this policy and to implement it. General Managers are responsible to ensure that adequate resources are provided for the implementation of this policy.

LEGISLATIVE REQUIREMENTS

Petra Diamonds Ltd is committed to the principles of the following human rights standards:

- The Universal Declaration of Human Rights
- The Voluntary Principles on Security and Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- UN Declaration on the Rights of Indigenous Peoples
- Guiding Principles on Business and Human Rights
- Legislation pertaining to human rights in the countries where we operate e.g. the Constitution of South Africa

ACRONYMS and DEFINITIONS

ILO: International Labour Organisation

The only tripartite U.N. agency. Since 1919 the ILO brings together governments, employers and workers representative of 187 member States (including South Africa, Tanzania and Botswana), to set labour standards, develop policies and devise programmes promoting decent work for all women and men.

UN: United Nations

The United Nations is an international organization founded in 1945. It is currently made up of 193 Member States. The mission and work of the United Nations are guided by the purposes and principles contained in its founding Charter.

Human Rights

Human rights are considered as inalienable fundamental rights to which a person is inherently entitled simply because she or he is a human being and which are "inherent in all human beings" regardless of their nation, location, language, religion, ethnic origin or any other status. The human rights specified in the South African Constitution (Ch.2) are based on the 30 rights of the Universal Declaration of Human Rights.

Indigenous People

There is no universally accepted definition for "Indigenous people," although it is generally accepted that indigenous people are people having a historical continuity with pre-invasion and pre-colonial societies that developed on their territories.