

POLICY



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Position/ Committee	Name	Date Approved	Signature
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1. INTRODUCTION

Petra Diamonds Limited (“Petra” or the “Company” or the “Group”) is a leading independent diamond mining group and a consistent supplier of gem quality rough diamonds to the international market. We are committed to the responsible development of our assets to the benefit of all stakeholders. We conduct our business in a manner that respects the human rights and dignity of all people. This commitment is based on the belief that business should be conducted honestly, fairly and legally.

Petra recognises its responsibility to respect the human rights of all individuals within any area Petra has impact or influence on not only within its operational areas. We understand how our operations can negatively affect human rights and we are committed to address adverse human right impacts. The process of ensuring human rights shall include assessing actual and potential human right impacts, integrating and acting upon the findings, tracking outcomes, and communicating how impacts have been addressed.

In developing this policy statement, 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
- UN Guiding Principles on Business and Human Rights
- UN Declaration on Human Rights Defenders
- All applicable laws pertaining to human rights in the countries where we operate

Petra has committed to adhering to the UN Guiding Principles on Business and Human Rights (UNGPs) by undertaking the following:

- Developing this policy statement as a commitment to meet our responsibility to respect human rights;
- To implement human rights systems to identify, prevent, mitigate and account for how we address our impact on human rights; and
- Developing processes to enable the remediation of any adverse human rights impacts we cause or to which we contribute.

2. POLICY STATEMENT

Fundamental to our value of treating each other with dignity and respect is our respect for human rights. Whereas the state is responsible for protection, promotion and fulfilment of human rights, companies have a critical role in respecting these rights and dealing proactively with potential and actual infringements.

Petra is committed to the avoidance of any human rights infringements and to addressing adverse human rights impacts where they are linked to our activities.

3. HUMAN RIGHTS TO BE RESPECTED

Our commitment includes all applicable internationally recognised human rights but particularly the International Bill of Rights (which includes the Universal Declaration of Human Rights), the International Labour Organisation Declaration on Fundamental Principles and Rights at Work and the UN Guiding Principles on Business and Human Rights.

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In ensuring our respect for human rights we declare our respect for the resources, values, traditions, and cultures of local and indigenous communities; to deal respectfully with issues of access to land; to mitigate environmental impacts including access to clean water; avoiding damaging as far as possible the right to livelihoods including those whose livelihood has historically been reliant on artisanal mining; operating with respect for human rights in post-conflict and weak governance zones; respecting the rights of human rights defenders and anyone opposing or raising concerns about our activities, and not tolerating any threats, intimidation, physical or legal attacks, or retaliation against them as detailed in our Human Rights Defenders Procedure; ensuring respect for human rights in deployment of security forces through, among other things, compliance with the Voluntary Principles on Security and Human Rights, and; consideration for society's most marginalised individuals and groups including woman and youth.

4. SCOPE

This policy statement applies to the Group, including the Petra Board and all Petra's operations to ensure awareness of and compliance to the Group's human rights commitments.

5. RESPONSIBILITY

- The Board, through the Social Ethics and Diversity ("SED") Committee is responsible for reviewing the Policy Statement and is communicated by the Executive Committee.
- The SED Committee monitors alleged violations of human rights and any such violations will be reported in the Company's Sustainability Report.
- Management is responsible for ensuring adherence to the principles of human rights and implementation of these principles in all Company policies and procedures.
- Procedures will be developed to enact the policy and ensure continuous improvement.
- All employees, contractors, suppliers, and business partners have the responsibility to comply with this policy.
- Employees, contractors, community members and business partners are invited to report alleged human rights violations by the Company, its representatives, or suppliers and service providers to the relevant Company Human Resources departments. This must be done making use of the approved grievance procedure for this purpose.

6. IMPLEMENTATION

This policy statement will be publicly available, communicated effectively, training provided to all relevant parties and updated as necessary.

Petra employees and stakeholders will be made aware of this policy statement to ensure that the Company meets the goals of this statement. We therefore communicate the Company's approach to discharge its duty to respect human rights both internally and externally.

7. 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 and are aligned to globally accepted best practices as set out in the International Finance Corporation (IFC) guidelines for grievance mechanisms and dispute resolutions. 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. All employees, contractors, suppliers or community members are encouraged to use these feedback mechanisms to report any infringement of human rights to the Company.

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8. GOVERNANCE AND REPORTING

This policy statement has been endorsed by the Board and shall be overseen and reviewed at Board level by the SED Committee. The Company shall report annually to stakeholders on the implementation of the Policy Statement by means of feedback in the Annual Sustainability Report. This policy statement is to be reviewed every two years or as required.