

# **THE DIACORE**

## **HUMAN RIGHTS POLICY**

### **1. OBJECTIVE OF THE POLICY**

The objective of this policy is to ensure that the Diacore Group of Companies (“Diacore”) demonstrates that it is committed to the principles of human rights, and supports, promotes, respects, and protects the fundamental human rights expressed in the Universal Declaration of Human Rights, the UN Global Impact, relevant ILO Conventions, and national legislation.

### **2. COMMITMENT**

- 2.1. From the broad perspective of Diacore's operations, human rights are an overarching area of policy linked to several specific related policies including equal opportunities, freedom of association, child labour, forced labour, non-discrimination, non-retaliation and working conditions. These will each be dealt with briefly in the policy below. However, it should be noted that Diacore has separate policies in place for these topics to ensure strict compliance.
- 2.2. Diacore is committed to the principles of human rights and does not source diamonds from Conflict-Affected areas. It is committed to respecting the human rights of all and any people that it encounters (which includes but is not limited to all its employees, suppliers, customers, and all communities that it encounters).
- 2.3. Diacore is committed to identifying the main human rights issues it faces and implementing specific and appropriate policies to address such issues where applicable and ultimately, ensuring immediate remediation if any adverse Human Rights impacts are caused or contributed to.
- 2.4. Diacore will comply with national and, where appropriate, international legislation and regulations with respect to human rights and in particular, the UN Guiding Principles on Business and Human Rights.

### **3. HUMAN RIGHTS**

All workers will be trained on the Human Rights Policy and will be fully informed on human rights issues that impact them, which could include (but not necessarily be limited to) human trafficking, harassment, discrimination and physical, sexual, racial, religious, psychological, verbal or any other form of harassment. To ensure the practical achievement of our commitment, Diacore will use all reasonable endeavours to:

- 3.1. Ensure that all workers are treated with equality, respect, and dignity.
- 3.2. Ensure that no worker will be subject to direct or indirect physical, sexual, racial, religious, psychological, verbal or any other discriminatory form of harassment or abuse, nor subject to intimidation or degrading treatment.
- 3.3. Ensure that we pay particular attention to the rights of those it encounters who belong to a group/or groups which may be particularly vulnerable to adverse human rights impacts which would include but not be limited to indigenous people, woman, national, ethnic, or religious minorities, children, people with disabilities and migrant works.
- 3.4. Ensure that human rights factors will be included, where applicable and appropriate, in all policy areas of Diacore's business.
- 3.5. Ensure that consideration of human rights performance shall be a factor in any investment decision as well as the selection of suppliers/contractors.
- 3.6. Ascertain whether there has been previous involvement in human rights abuses before hiring staff.
- 3.7. Ensure that human rights abuses seen or reported in connection with work will be reported by Diacore to the relevant authorities and followed up.
- 3.8. Ensure that suitable arrangements are in place to ensure the security of all workers and facilities, particularly in countries where military or security forces have abused human rights. Security personnel will receive training on policies and/or procedures concerning all aspects of human rights relevant to operations. Where appropriate, local guidelines for working with state security forces will be drawn up.
- 3.9. Where appropriate and necessary, Diacore will work with the relevant interested parties to understand local human rights issues and develop shared responses.
- 3.10. Diacore will only use armed security personnel when there is no other suitable alternative. All relevant circumstances prevailing will be considered.

#### **4. GRIEVANCE MECHANISM**

Diacore has an effective grievance procedure in place which can be utilized by any party that has grievance with the company. Any party that submits a grievance can do so in confidence and without fear of reprisal. Diacore undertakes to resolve any complaint/query which will be investigated immediately, and we will identify corrective action that should be implemented to avoid similar complaints in the future. Diacore will ensure that the outcomes of any complaints/queries will be communicated to the relevant stakeholders. Diacore will retain all appropriate records of any grievances raised, investigations that have

followed and the relevant outcomes.

## **5. FREEDOM OF ASSOCIATION**

- 5.1. Recognition will be given to the existence, membership and lawful activities of lawful and registered trade unions or worker representative bodies, and worker representatives will be given reasonable access to Diacore's premises to carry out their responsibilities/functions.
- 5.2. Where the law restricts the right to freedom of association and collective bargaining, Diacore will use all reasonable endeavours to facilitate, and not hinder, the development of parallel means of free association and bargaining.
- 5.3. The terms of Collective bargaining agreements will be adhered to.
- 5.4. Workers have the right to form or join (or not join) lawful and registered trade unions or Worker representative bodies of their own choice without fear of coercion or retaliation.
- 5.5. Subject to national legislation, Diacore recognises lawful and registered trade unions or representative bodies as a party in the collective bargaining process.
- 5.6. Worker or trade union representatives will have reasonable access to their members in the workplace.

## **6. NON-RETALIATION**

- 6.1. Diacore is aware of the need to include workers in the process of ensuring that the company operates ethically and in compliance with the law.
- 6.2. There will be no adverse work-related consequences against a person who, in good faith, discloses information about a situation or type of conduct that he/she feels to be unethical, illegal, or potentially illegal.
- 6.3. All forms of retaliatory action are prohibited, including:
  - 6.3.1. Threats or intimidation
  - 6.3.2. Coercion; and/or
  - 6.3.3. Discrimination
- 6.4. Complaints and grievances will remain strictly confidential, with access to information available only on a need-to-know basis.
- 6.5. If the complaints by a worker are found not only to be groundless, but to have been made in bad faith (after a thorough investigation into the fact) then, disciplinary action

may be taken against that worker.

## **7. NON-DISCRIMINATION**

- 7.1. Diacore is committed to the principles of equality and non-discrimination.
- 7.2. Diacore in its recruitment, termination, remuneration, promotion, and retirement policies, at all levels of the company, will not engage in or support any unfair discrimination on the grounds of race, caste, national origin, religion, age, disability, physical appearance, gender, marital/parental status, sexual orientation, HIV status, migrant status, membership of worker representative bodies, political affiliation, or any other arbitrary criteria.
- 7.3. Diacore is committed to equal opportunities for both men and woman in the workplace with regards to training, personal and professional development, and advancement.
- 7.4. Diacore will not interfere with the exercise of the rights of workers to observe practices or to meet needs relating to race, caste, national origin, religion, age, disability, physical appearance, gender, marital/parental status, sexual orientation, HIV status, migrant status and membership of worker representative bodies, political affiliation, or any other unlawful criteria.
- 7.5. Notwithstanding the above, Diacore will support any national legislation that encourages or imposes positive-discrimination or affirmative action obligations, economic advancement and/or rights of various categories of workers.

## **8. CHILD LABOUR**

- 8.1. Diacore does not support and will not use child labour. Diacore has adopted the definition of 'Child Labour' as set out in the United Nations International Labour Organisation Minimum Age Convention (138), in which such definition is as follows: *"A child is defined as any person less than 15 years of age unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age shall apply. Child labour is therefore any work by a child younger than this age and any work that is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, moral, or social development."*
- 8.2. Where national legislation provides more onerous legislation in respect of child labour, such legislation shall be adhered to.

## **9. FORCED LABOUR**

- 9.1. Diacore is committed to the principles of human rights and freedom of movement.

- 9.2. Diacore supports the Universal Declaration of Human Rights, which states that ‘no-one shall be held in slavery or servitude’.
- 9.3. Diacore has adopted the definition of forced or compulsory labour as defined in ILO Convention 29 as follows: “*all work or service which is extracted from any person under the menace of penalty and for which the said person has not offered himself voluntarily*”.
- 9.4. Diacore will not use or support the use of any type of forced labour or bonded labour, including slavery; prison labour that is required from prisoners without pay or to complete their sentence; labour as a punishment for expressing political views or labour demanded of Workers because of their debt.
- 9.5. Diacore does not and will not support any forms of forced labour. Diacore is against human trafficking and does its own hiring to eliminate the risk of human trafficking.
- 9.6. Diacore employees are not required to lodge deposits or identity papers when they commence employment. They are free to resign should they wish, provided they give reasonable notice (as per their employment contracts).
- 9.7. Diacore will apply all the above in its recruitment of workers.

## **10. HUMAN RIGHTS IN RELATION TO INFECTIOUS DISEASES**

The Diacore Group of Companies fully understands that protecting the right to life and the right to health can be extremely challenging. This became apparent when the world was struck by the COVID-19 pandemic. When there is a breakout of an infectious disease that may of course occur without warning, we at Diacore are fully committed to strike a balance between keeping people healthy and safe, whilst at the same time maintaining the business operations of our group of companies. In doing so, we are committed to:

- Protecting the *right to life* and the *right to health* to reduce the risk of spreading the relevant virus. Where possible, work from home arrangements will be implemented.
- We will adopt the following risk control measures to protect ones right to health and at the same time ensure employees always have the right to work in the most favorable conditions. Diacore will implement the following:
  - Reduce physical interactions between workers and visitors and respect physical distancing when interactions do occur
  - Improve ventilation in the workplace where this is possible
  - Regularly clean surfaces, ensuring workspaces remain clean and hygienic, and
  - We will provide adequate facilities for handwashing and sanitization and the required PPE/masks to all workers.

- Those you have contracted or who may contract the virus need to share this information with their employer and even the government in their jurisdiction if they have the track and trace programs in place. Disclosing such information has the potential to infringe on the employees' **right to privacy** and **right to confidentiality**. To prevent this, Diacore is committed to following a confidential procedure for disclosing sensitive information and will continue to honour the relevant staff member's privacy in the event of their self-isolation.

## **11. ENFORCEMENT**

Failure to comply with the principles laid down in this policy will be viewed as a breach of company policy and procedure and could result in disciplinary action being instituted. Diacore's policies as incorporated into this document will be effectively communicated to management and to all workers.

A handwritten signature in black ink, appearing to read "Boyd", written over a horizontal line.

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**MANAGEMENT**