

SUMMARY REPORT FOR 2024 BPP CYCLE

Introduction

This summary has been prepared to set out the performance of the DTC mining and selling entities against the requirements of the Best Practice Principles (BPP) programme in the 2024 BPP cycle which ran from January 1 to December 31, 2024.

The DTC mining entities are Jwaneng Mine and Orapa Letlhakane and Damtshaa Mines (OLDM) in Botswana; Gahcho Kué Mine in Canada; Venetia Mine; and land-based and coastal recovery operations and marine-based recovery operations in Namibia.

In addition, three sales entities are included in scope, these are DTC in Botswana; DTC in South Africa and Namibia Diamond Trading Company (NDTC) in Namibia.

The Self-Assessment Process

All these entities are required to submit a self-assessment workbook against the BPP requirements annually. The self-assessment allows for each site to review each requirement and ensure systems, risk assessments, processes, training and policies are in place and up-to-date and any changes are appropriately accommodated. Self-assessments help each site ensure they are prepared for third party verification. Site selection for third party visits only occurs after the submission of self-assessments so all sites completing the workbook do this without the knowledge of whether they may be amongst those chosen at the time of submission.

Third Party Verification through On-site Visits and Desktop Reviews

Verification by SGS is undertaken in 2 stages:

1. **Desktop review of submitted workbooks:** This review process, based on one third of all submitted workbooks annually, verifies that required self-assessment workbooks have been submitted; that all questions have been answered; that the responses to the questions support the compliance status declared in each case and to test the conclusions by requesting supporting evidence on a random number of questions.
2. **On-site verification visits:** These visits provide an in-depth assessment of the entities' compliance against the BPP requirements. During an on-site visit, the auditor reviews evidence of policies, procedures and practices that demonstrate compliance with the requirements. Auditors speak to the entity's subject expert leads and have interviews with employees to triangulate information. Each year, at least 2 DTC mining entities receive an on-site visit, so all 6 mines are audited at least once every three to four years. Auditors spend up to three days on location to verify compliance against the BPP requirements. In addition, the Sales entities are selected for visits on a sampling basis.

Annex 1 includes a list of all entities and the date of their last audit (whether by desktop, on-site or through virtual (remote) assessment) and their compliance status.

The following assessments were undertaken during the 2024 cycle.

Entity	Dates of Assessment	Findings
Orapa, Letlhakane and Damtshaa	6 – 10 May 2024	One Improvement Opportunity, no Minor, Major or Material Infringements.
Marine recovery operations, Namibia	3 – 5 June 2024	No Improvement Opportunities, Minor, Major or Material Infringements.
Land recovery operations, Namibia	24 – 27 June 2024	No Improvement Opportunities, Minor, Major or Material Infringements.
Gahcho Kué	18 – 20 June 2024	No Improvement Opportunities, Minor, Major or Material Infringements.
DTC (Gaborone), Botswana	20 – 21 May 2024	No Improvement Opportunities, Minor, Major or Material Infringements.

Summary of Findings

No Major or Minor infringements were identified for these entities and each of these demonstrated their full compliance to the BPP programme. One Improvement Opportunity was identified at the Orapa, Letlhakane and Damtshaa Mine site relating to its on-site contractor company having not issued renewed contracts to a small sample of workers. The management resolved the issue immediately before the closing of the verification. Improvement Opportunities are not compliance issues, but instead, are areas where continuous improvement to drive best practice have been identified.

The BPP Programme Requirements

The BPP programme was aligned to the RJC Code of Practices Standard 2019 during the 2020 cycle and continues to reflect the new heightened requirements of that Standard. In some cases, the BPP requirements are set at a higher level and where this occurs the higher requirements apply. As a result, the BPP requirements continue to be the leading benchmark across industry, continually raising the bar of ethical and best practice.

The programme is verified by SGS, the world's leading independent verification and certification organisation and an accredited RJC Certification Body with no commercial interests in the diamond industry. SGS maintains a vigilant system to ensure that no conflicts of interest arise through their other services both in relation to the BPPs and to the RJC Code of Practices certification standard.

All these entities are assessed against the BPP requirements under the following risk areas. During the 2024 cycle, the BPP requirements were fully in scope as outlined in the table below.

Section	Requirements
Business Responsibilities	Ethical Standards
	Commitment
	Business Integrity
	Financial Offences
	Kimberley Process and System of Warranties
	Sourcing from conflict-affected and high-risk areas
	Product Security
	Disclosure
	Melee Assurance Protocol
	Supply Chain Management/Best Endeavours
	Provenance Claims
	Grading and Appraisal
Social Responsibilities	Employment
	Health and Safety
	Non-discrimination, Harassment, Bullying and Disciplinary Practices
	Child Labour
	Forced Labour
	Human Rights
	Direct Sourcing from Artisanal and Small-Scale Mining
Environmental Responsibilities	Best Environmental Practice and Regulatory Framework

Mining Specific Requirements	Extractive Industries Transparency Initiative
	Impact Assessment
	Community Engagement and Development
	Health and Safety
	Biodiversity
	Natural Resource and Environmental Risk Management
	Mercury
	Indigenous Peoples
	Artisanal and Small-Scale Mining
	Security Guards
	Mine Closure Planning
	Sustainability Reporting
	Diversity and Inclusion

These risk areas are underpinned by a detailed set of requirements and definition of what constitutes compliance, including review of policies, procedures, risk assessments, training and retention of records.

Infringements are categorised as Minor, Major or Material depending on the severity.

- A Minor Infringement is any compliance issue that can be rectified within a short period and that, if managed responsibly, is not deemed by the Assessors or Independent Verifiers to result in any adverse impact. Minor Infringements require a Corrective Action Plan.
- A Major Infringement is any compliance issue that can be rectified within a reasonable period and that, if managed responsibly, is not deemed by the Assessors or Independent Verifiers to result in significant adverse impact. Major Infringements require a Corrective Action Plan with milestones/timelines.
- A Material Breach is any serious non-compliance issue that contravenes the core BPPs.

Improvement Opportunities can also be listed for the record, to assist the group/entity/facility towards continuous improvement or be a limited compliance issue where resolution is beyond the ability of the group/entity/facility to resolve. Improvement Opportunities do not require a Corrective Action Plan.

No Major or Minor infringements were identified for these entities as a result of the verifications and each of them gave their full cooperation to give access to the evidence and documentation requested and demonstrated their full compliance to the BPP programme.

Conclusion of Compliance

The verification found that policies and procedures are embedded into normal operations and there is a commitment to continuous improvement against both the BPP and RJC requirements.

No infringements were identified during first or third-party assessments. One Improvement Opportunity was raised to highlight areas where further enhancement was identified, although compliance was achieved.

Full compliance with the BPP Requirements was demonstrated.



Emma Wilson
SGS United Kingdom Ltd
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www.uk.sgs.com

ANNEX A – ENTITIES AND COMPLIANCE STATUS

The entities involved in the BPP programme, and the results of the most recent on-site visits are detailed below.

Entity	Country	Most Recent Audit	Findings from last on-site audit
Jwaneng Mine	Botswana	04-07 September 2023	<ul style="list-style-type: none"> • No Material, Major or Minor Infringements • No Improvement Opportunities
Orapa, Letlhakane and Damtshaa Mines	Botswana	6 – 10 May 2024	<ul style="list-style-type: none"> • No Material, Major or Minor Infringements • One Improvement Opportunity
Marine-based recovery operations, Namibia	Namibia	3 – 5 June 2024	<ul style="list-style-type: none"> • No Material, Major or Minor Infringements • No Improvement Opportunities
Land-based and coastal recovery operations, Namibia	Namibia	24 – 27 June 2024	<ul style="list-style-type: none"> • No Material, Major or Minor Infringements • No Improvement Opportunities
Venetia	South Africa	01-04 August 2022	<ul style="list-style-type: none"> • No Material, Major or Minor Infringements • No Improvement Opportunities
Gahcho Kué	Canada	18 – 20 June 2024	<ul style="list-style-type: none"> • No Material, Major or Minor Infringements • One Improvement Opportunity
DTC (Gaborone), Botswana	Botswana	20 – 21 May 2024	<ul style="list-style-type: none"> • No Material, Major or Minor Infringements • No Improvement Opportunities
DTC (Johannesburg), South Africa	South Africa	05 October 2021 (Remote assessment) 20 October 2021 (On-site assessment)	<ul style="list-style-type: none"> • No Material, Major or Minor Infringements • No Improvement Opportunities
NDTC, Namibia	Namibia	27 October 2022	<ul style="list-style-type: none"> • No Material, Major or Minor Infringements • No Improvement Opportunities

A summary of the latest desktop review of workbooks and the outcome is provided below.

Entity	Cycle	Findings
Jwaneng Mine, Botswana	2021	<ul style="list-style-type: none"> • No Material, Major or Minor Infringements • No Improvement Opportunities
Orapa, Letlhakane and Damtshaa Mines, Botswana	2023	<ul style="list-style-type: none"> • No Material, Major or Minor Infringements • One Improvement Opportunity
Marine-based recovery operations, Namibia	2018	<ul style="list-style-type: none"> • No Material, Major or Minor Infringements • No Improvement Opportunities
Land-based and coastal recovery operations, Namibia	2021	<ul style="list-style-type: none"> • No Material, Major or Minor Infringements • No Improvement Opportunities
Venetia, South Africa	2024	<ul style="list-style-type: none"> • No Material, Major or Minor Infringements • No Improvement Opportunities
Gahcho Kué, Canada	2022	<ul style="list-style-type: none"> • No Material, Major or Minor Infringements • No Improvement Opportunities
DTC (Gaborone), Botswana	2021	<ul style="list-style-type: none"> • No Material, Major or Minor Infringements • Two Improvement Opportunities
DTC (Johannesburg), South Africa	2024	<ul style="list-style-type: none"> • No Material, Major or Minor Infringements • No Improvement Opportunities
NDTC Namibia	2024	<ul style="list-style-type: none"> • No Material, Major or Minor Infringements • No Improvement Opportunities