

## ANTI-SLAVERY POLICY As at 12 March 2018

### 1. INTRODUCTION

Lucapa Diamond Company Limited ("**LOM**") is a global diamond mining and exploration company with operations worldwide. **LOM** and all its subsidiaries value human rights and are committed to ensuring that all business is conducted according to ethical, professional and legal standards in a fair, honest and open manner.

The Modern Slavery Act 2015, an Act of Parliament of the United Kingdom, and the Criminal Code Act 1995 (Cth) ("**Criminal Code**"), an Act of Parliament of the Commonwealth of Australia, both apply to all **LOM** operations worldwide. In February 2013, the Australian Government passed the Crimes Legislation Amendment (Slavery, Slavery-Like Conditions and People Trafficking) Act 2013 (Cth) which amended the Criminal Code by:

- adding additional offences of forced marriage and forced labour;
- broadening the definition of servitude beyond sexual servitude; and
- expanding the definition of "coercion".

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as:

- slavery, servitude (coercing someone to provide services) and forced and compulsory labour;
- human trafficking (arranging or facilitating the travel or movement of a victim with a view to them being exploited);
- committing any offence with the intention to commit human trafficking; and
- aiding, abetting, counselling or procuring any of the above offences.

all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. **LOM** has a commitment to conduct its business and all its relationships based on integrity.

### 2. POLICY

This Anti-Slavery and Human Trafficking **Policy** ("**Policy**") applies to all directors, officers and employees, collectively "**You**", of **LOM** and its subsidiaries who are employed worldwide. This **Policy** should also be read in conjunction with the "**LOM** Group Anti-Corruption and Bribery **Policy**".

**LOM** has a zero tolerance approach to all forms of modern slavery and human trafficking within its business and within its supply chain and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place in its own business or in any of its supply chains.

The Boards of each of the subsidiary companies making up the **LOM** Group have overall responsibility for ensuring this **Policy** complies with our legal and ethical obligations and that all those under our control comply with it. Management at all levels are responsible for ensuring those reporting to them understand and comply with this **Policy** and are given appropriate training on it and the issue of modern slavery and human trafficking in supply chains.

**You** are invited to comment on this **Policy** and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the **LOM** Corporate Office.

The Board of each of the subsidiary companies making up the **LOM** Group are committed to the **Policy** and each is diligently putting measures in place that are designed to prevent and detect modern slavery and

human trafficking within their business and their supply chain. **LOM's** programme in this regard contains the following elements:

- A policy which articulates **LOM's** commitment to prevent violations of the Modern Slavery Act 2015 and the relevant provisions of Criminal Code within its operations and supply chain, being this **Policy**;
- Communication of this **Policy** and all relevant elements of the programme to all employees of **LOM**, its subsidiaries and to our business partners and supply chain;
- The assessment of modern slavery and human trafficking risks within **LOM** and its supply chain and the development of effective, efficient and transparent controls to reduce exposure to those risks;
- The adoption of anti-slavery wording in relevant contracts;
- Where appropriate, conducting due diligence on business partners, agents, contractors, consultants, sub-contractors and suppliers coupled with a requirement that they implement procedures which incorporate the principles of the Modern Slavery Act 2015 and the relevant provisions of the Criminal Code; and
- Training of all relevant individuals employed by **LOM** and its subsidiaries so that compliance with **LOM's** policies and procedures is the duty of all relevant employees at all levels and so that individuals can recognise modern slavery practices and take steps to avoid the same.

**LOM** is also committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery and human trafficking throughout its supply chains, consistent with its disclosure obligations under the Modern Slavery Act 2015 and the Criminal Code. In addition to the above, **LOM** provides safe and fair working conditions for all its employees and ensures that no child labour is employed, in line with minimum age laws, within the countries that it operates. **LOM** expects the same standards from all of its contractors, suppliers and other business partners and as part of its contracting processes, include specific prohibitions against the use of forced, compulsory or trafficked labour or anyone held in slavery or servitude, whether adults or children and we expect that our suppliers will hold their own suppliers to the same standards. Pursuant to section 54 of the Modern Slavery Act 2015, the Board of each subsidiary company making up the **LOM** Group commits to annually, setting out the steps it has taken during that particular financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains or within its own business.

### 3. **COMPLIANCE WITH THIS POLICY**

Anyone working on **LOM's** behalf or its subsidiaries in any capacity, including employees at all levels, directors, officers, agents, contractors, external consultants, third party representatives and suppliers must read, understand and comply with this **Policy**.

The prevention, detection and reporting of modern slavery in any part of **LOM's** businesses and supply chains is the responsibility of all those working for it or under its control. Those working on **LOM's** behalf are required to avoid any activity that might lead to, or suggest, a breach of this **Policy**.

**You** must notify an Executive Director of **LOM** or **LOM's** legal counsel as soon as possible if **You** believe or suspect that a conflict with this **Policy** has occurred or may occur in the future. Staff are encouraged to raise concerns about any modern slavery likely in any parts of **LOM's** supply chains in any supplier tier at the earliest possible stage.

### 4. **REPORTING**

Internal reporting is critical to the **LOM's** success and it is both expected and valued. **You** are required to be proactive and promptly report any suspected violations of the **Policy** or any illegal or unethical behaviour that **You** become aware of. Complaints will be kept confidential and will be dealt with appropriately. **You** will not experience retribution or retaliation for a complaint made in "good faith".

If a member of staff believes that a breach of this **Policy** has occurred or is likely to occur, they must notify

their manager or Executive Director of **LOM** and/or **LOM**'s legal counsel as soon as possible. If the staff member is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of **LOM**'s supply chains constitutes any of the various forms of modern slavery, it should be raised with their manager or Executive Director of **LOM** and/or **LOM**'s Legal Department.

**LOM** aims to encourage openness and will support anyone who raises genuine concerns in good faith under this **Policy**, even if they turn out to be mistaken. **LOM** is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of its business or in any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If any staff member believes that they have suffered any such treatment, they should inform an Executive Director of **LOM** and/or **LOM**'s legal counsel immediately.

## 5. **COMMUNICATION AND AWARENESS OF THIS POLICY**

Training on this **Policy** and on the risk our business faces from modern slavery in its supply chains will be provided as necessary.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## 6. **BREACHES OF THIS POLICY**

Any employee who breaches this **Policy** by engaging in or conspires to engage in any modern slavery conduct or human trafficking will face disciplinary action. This could, in the most severe circumstances include immediate dismissal for misconduct or gross misconduct and if warranted legal proceedings may be brought against **You**.

**LOM** may terminate its relationship with other individuals and organisations working on its behalf or engaged by it if they breach this **Policy**.

## 7. **KEY CONTACTS**

If **You** have any questions about this **Policy**, please contact the appropriate person from **Your** region:

Australia – Mark Clements [mclements@lucapa.com.au](mailto:mclements@lucapa.com.au)

Lesotho – Stian van Blerk [svanblerk@mothae.com](mailto:svanblerk@mothae.com)

Angola – Pieter von Wielligh [vonwiellighp@gmail.com](mailto:vonwiellighp@gmail.com)

or any member of **LOM**'s Board or **LOM**'s legal counsel.

Approved by the Lucapa Diamond Company Limited Board on 12 March 2018.