



DIVERSITY POLICY

1. Background

Lucapa Diamond Company Limited (“Lucapa” or “the Company”) is committed to a workplace culture that promotes the engagement of diverse, qualified, capable and motivated staff at all levels of the organisation in order to deliver enhanced corporate performance, reputation and shareholder value for the Lucapa group.

To commit to cultural diversity, and in an effort to attract the most talented people in their respective fields, Lucapa seeks to employ staff locally in the countries in which it operates. Lucapa promotes an environment where staff can enjoy good working relationships with each other and across all levels of the organisation that is free of discrimination.

2. Scope

This policy applies to all Lucapa officers, employees and contractors engaged in activities under Lucapa’s control and at any and all Lucapa locations.

3. Objectives

- To recruit and retain people at every level of the organisation on the basis of their ability and performance regardless of factors such as age, cultural, ethnic or religious background, gender, nationality, physical ability or race.
- Never to accept any type of unlawful bullying, discrimination, harassment, victimisation or vilification anywhere in the Lucapa group.
- *Stephen Wetherall* While retaining a merit based culture for all employees across the organisation, a key focus is to seek and support, where possible, greater gender diversification in our operations and management.
- To support staff in their professional development and life balance, and promotion within the organisation.
- Regularly, to review pay equity to address any anomalies and any gender gaps.
- To undertake and monitor all diversity initiatives and measure their progress and effectiveness at least annually.
- To review this policy regularly and update it as required.

4. Responsibilities

Lucapa’s Board is ultimately responsible for diversity at both Board and staff level.

Authorised on behalf of the Lucapa Board of Directors.

Stephen Wetherall
Chief Executive Officer & Managing Director

Dated: 29 March 2023
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Prepared by:	Company Secretary	Review Date:	29/03/2025
Approved by:	Board of Directors	Approver’s Signature:	Stephen Wetherall

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