

BUILDING FOREVER

OUR JOURNEY

A smiling woman with dark skin, wearing a white hairnet and a white short-sleeved button-down shirt. The shirt has a logo on the left chest that says "De Beers Bakery" and "EST. 1904". She is standing in front of a large stack of round, golden-brown bread rolls. The background is a plain, light-colored wall.

**GRI AND ASSURANCE
SUPPLEMENT 2018**

DE BEERS GROUP

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BUILDING FOREVER

OUR JOURNEY (APRIL 2019)

GRI INDEX

INTRODUCTION

Our 2018 sustainability performance and data disclosure has been prepared in accordance with the Global Reporting Initiative (GRI) Standards: core option. We referred to the principles set out in GRI Standard 101: Foundation 2018 to define the report's content and to guide our efforts in providing information that is accurate, comprehensive and balanced.

This GRI index directs readers to content on the De Beers Group website and in our **Building Forever: Our Journey, Volume 2 (April 2019)** printed publication. Together, these sources provide full disclosure on our sustainability approach and performance in 2018.

We engaged **Bureau Veritas** to undertake an independent, third-party assurance on information disclosed across both our online and printed report. This covered all qualitative information and quantitative performance data for the calendar year 2018 (January 1st to December 31st) with one exception (see assurance statement on page 4 for further information).

Bureau Veritas has confirmed that our report meets the requirements of GRI Standards: core option. Their full assurance statement is provided on pages 4 and 5.

INDEPENDENT ASSURANCE STATEMENT



TO: THE STAKEHOLDERS OF DE BEERS GROUP

Introduction and objectives of work

Bureau Veritas UK Ltd. ('Bureau Veritas') has been engaged by De Beers Group ('De Beers') to provide independent assurance over the sustainability information reported in the printed version of De Beers Group's sustainability disclosure: 'Building Forever: Our Journey, Volume 2', and the accompanying online disclosure '<https://www.debeersgroup.com/building-forever/our-impact>' including the GRI Index, also available for download at www.debeersgroup.com Index ("the Report"). This Assurance Statement applies to the related information included within the scope of work described below.

Scope of work

The scope of our work was limited to assurance over the data and information included within the De Beers' "Building Forever: Our Journey, Volume 2", content under the online section "building-forever/our-impact" as set out at <https://www.debeersgroup.com/building-forever/our-impact> and the GRI index 2018 for the period of the 1st of January to the 31st of December 2018 (the "Selected Information").

Limitations and exclusions

Excluded from the scope of our work is verification of any information relating to:

- Data and information related to "Zimele" reported in the sections "Progress in 2018/2019 -Zimele goes from strength to strength", "Enterprise development" and data related to "Zimele" disclosed in the section "Data centre";
- Activities outside the defined verification period;
- Positional statements (expressions of opinion, belief, aim or future intention by De Beers) and statements of future commitment;
- Financial data included in the Report which are audited by an external financial auditor, including but not limited to any statements relating to production, tax, sales, and financial investments; and
- Other information included in the Report other than scope defined above.

This limited assurance engagement relies on a risk based selected sample of sustainability data and the associated limitations that this entails. This independent statement should not be relied upon to detect all errors, omissions or misstatements that may exist.

Responsibilities

The preparation and presentation of the Selected Information in the Report are the sole responsibility of the management of De Beers.

Bureau Veritas was not involved in the drafting of the Report. Our responsibilities were to:

- Obtain limited assurance about whether the Selected Information has been prepared in accordance with internationally acceptable definitions of the relevant indicators;
- Form an independent conclusion based on the assurance procedures performed and evidence obtained; and
- Report our conclusions and detailed findings and recommendations to De Beers' management.

Assessment standard

We performed our work in accordance with the requirements of the International Standard on Assurance Engagements ('ISAE') 3000 Revised, Assurance Engagements Other than Audits or Reviews of Historical Financial Information (effective for assurance reports dated on or after December 15, 2015).

Our conclusions are for 'limited' assurance as set out in ISAE 3000.

Summary of work performed

As part of its independent verification, Bureau Veritas undertook the following activities:

1. Conducted interviews at De Beers' Head Offices in London, United Kingdom, Johannesburg, South Africa and via teleconference with relevant personnel of De Beers responsible for collating the Selected Information;
2. Examined the data collection and consolidation processes used to compile the Selected Information, including assessing assumptions made, and the data scope and reporting boundaries;
3. Reviewed a sample of the Selected Information against the corresponding source documentation provided by De Beers. However, the review of source documentation for data already assured through Anglo American's (De Beers' parent company) reporting cycle has not been repeated in our sampling activities;
4. Assessed the disclosure and presentation of the Selected Information in the Report to ensure consistency with assured information.

Details of our analysis were provided to De Beers in an internal report to management.

Conclusion

On the basis of our methodology and the activities described above, nothing has come to our attention to indicate that the Selected Information is not fairly stated in all material respects. It is our opinion that De Beers has established appropriate systems for the collection, aggregation and analysis of sustainability data.

Statement of independence, integrity and competence

Bureau Veritas is an independent professional services company that specialises in quality, environmental, health, safety and social accountability with over 185 years history. Its assurance team has extensive experience in conducting verification over environmental, social, ethical and health and safety information, systems and processes.

Bureau Veritas operates a certified¹ Quality Management System which complies with the requirements of ISO 9001:2008, and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Bureau Veritas has implemented and applies a Code of Ethics, which meets the requirements of the International Federation of Inspections Agencies (IFIA)², across the business to ensure that its employees maintain integrity, objectivity, professional competence and due care, confidentiality, professional behaviour and high ethical standards in their day-to-day business activities.

The assurance team for this work conducted the verification independently and is not involved in any other Bureau Veritas projects with De Beers.

Bureau Veritas UK Ltd.

London
18 April 2019

¹ Certificate of Registration FS 34143 issued by BSI Assurance UK Limited

² International Federation of Inspection Agencies – Compliance Code – Third Edition

SUMMARY REPORT FOR DE BEERS GROUP 2018 CYCLE



ROLE OF SGS IN THE BEST PRACTICE PRINCIPLES PROGRAMME

Appointment of SGS

SGS has been the verification partner for the De Beers Best Practice Principles (BPPs) Assurance Programme since July 2003. After involvement in the development of the programme and initial pilots, SGS has verified compliance against the BPP requirements since they came into full force in 2005. The programme now covers 2805 entities in 78 countries encompassing a range of activities and sizes.

SGS is the world's leading independent verification and certification organisation with no commercial interests in the diamond industry. SGS continues to maintain a vigilant system to ensure that no conflicts of interest arise through the provision of additional services to Sightholders, Accredited Buyers, Forevermark Diamantaires, Beneficiation Programme Members or the De Beers Group. This has been supplemented by further safeguards since SGS gained accreditation as a Certification Body for the Responsible Jewellery Council which also has requirements in this regard.

Scope of work and evolution of programme

The 2018 BPP cycle ran from 01 April 2018 to 31 March 2019. For 2018, this coincided with the recertification of De Beers Group to the Responsible Jewellery Council (RJC) Code of Practices Standard 2013. The programme itself remains fully aligned with this RJC Standard. In some cases, the BPP requirements are set at a higher level and this has not been compromised. The BPP requirements continue to be the leading benchmark across industry, continually raising the bar of ethical and best practice.

The requirement for the De Beers Group entities in respect of the implementation and communication of their Code of Conduct was further emphasised in this cycle. In addition, all participants were required to review their performance in respect of gender equality as well as indicators of forced labour, such as ensuring the absence of agency and related fees. A requirement was also added for the entity's senior management to provide a commitment that their first party assessments were completed in the spirit of the BPPs.

The five Beneficiation Project Members were again required to submit workbooks and this year full visits were made to all of these. The visits were made in a collaborative spirit, with the objective to support as well as assess. Two of the Members were able to achieve full compliance. For the other three Members, 8 Major Infringements were raised between them including in relation to the appointment of an AML/CFT Compliance Officer and in the case of one of the companies, lacking

fire safety procedures and health & safety equipment. Beneficiation Project Members are being assisted by De Beers to ensure these infringements are closed out to bring them in line with the compliance standards.

As in previous years, the online BPP SMART System provides opportunities to leverage areas of commonality. All participants were able to select an "auto-complete" option to carry forward their responses from the previous cycle if no changes have occurred. Further, participants who are already certified to the RJC Code of Practices can upload their RJC certificates to the online system. This facilitates a shorter first party assessment workbook being available to recognise their RJC certification. However, the third-party verification visits continue to assess compliance across all relevant aspects of the BPP Requirements through a risk-based approach, ensuring a deeper verification is undertaken. In addition, Sightholders and Accredited Buyers may elect to integrate RJC certification visits into their BPP programme to streamline their approach to these programmes and avoid audit duplication. In 2018, 50 combined BPP/RJC visits were undertaken covering 34 Sightholders/Accredited Buyers who had elected to become certified, or to renew their certification, or extend the scope for additional entities or to include provenance claims.

The scope of work undertaken by SGS as the BPP verifier for the 2018 cycle comprised the following:

- Desktop review of a sample of the workbooks submitted by Sightholders and Accredited Buyers for their owned operations and contractor (Tier B) sites and by the De Beers Group of Companies. This process verifies that all required 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.
- Verification visits on up to 10% of each Sightholder or Accredited Buyer's declared eligible entities including substantial Tier B entities to independently assess their performance against the BPP requirements through first-hand evaluation of evidence of compliance with the issues concerned.
- Additional visits to a sample of non-substantial Tier B contractors who were declared as manufacturing melee diamonds (0.01 cts and below) to conduct a limited scope visit covering the Melee Assurance Protocol and key Health & Safety and Labour Standards topics.

- Ratings for findings are recommended by the local auditor, but final decisions on the ratings of each finding are made by joint agreement with SGS Central and De Beers teams.
- Provision of information relating to the compliance status of Sightholders' and Accredited Buyers' entities and details of any significant issues. This information is provided in accordance with the confidentiality requirements imposed by the Ombudsman.
- Ongoing support in explaining local legislative requirements and common issues and challenges.
- Provision of information relating to the compliance status of Sightholders' and Accredited Buyers' entities and details of any significant issues. This information is provided in accordance with the confidentiality requirements imposed by the Ombudsman.
- Ongoing support in explaining local legislative requirements and common issues and challenges.

Verification methodology

The verification process is undertaken in 3 stages:

- In the country of operation, the desktop review of workbooks is undertaken by qualified auditors who also meet the requirements of the RJC certification programme. These are experienced Social Auditors, cross-trained in environmental management and the business elements applicable to companies involved in diamonds and gold and trained on the requirements of the Best Practice Principles.
- Local reviews are then submitted to a central review point and subsequently cross-checked to ensure consistency by country and requirement.
- A sample of up to 10% of each Group's entities is selected centrally for onsite verification visits to check the effectiveness of the first party assessments and to evaluate at first hand the situation on the ground.

De Beers Group facilities

For the De Beers Group, the requirement for the submission of self-evaluations was completed to the agreed deadlines and 52 workbooks were submitted for eligible facilities. 15 workbook reviews were conducted during the cycle. These have been rated in accordance with the BPP programme requirements and no Material, Major or Minor Infringements were raised. 27 Improvement Opportunities were self-declared across a number of topics in the Business Practices and Employment sections.

Seven onsite verification visits were undertaken at De Beers Group entities as part of their recertification against the RJC 2013 Code of Practices standard. The entities selected for visits included 3 Mining entities and 2 Sales operations

as well as a range of other activities. No Material, Major or Minor Infringements were raised and this resulted in a further 3-year certification being recommended. 18 Improvement Recommendations were raised across all the visits to highlight areas where these entities could seek to further improve their performance.

There are no open infringements from previous cycles and the BPP team and De Beers Group entities have been open to all improvement recommendations and responsive to all information requests.

Sightholders and Accredited Buyers

All entities that are owned or under the management control of Sightholders, Accredited Buyers and Forevermark Diamantaires are required to participate in the full BPP Programme. In addition, substantial contractors - those that derive more than 75% of their revenue from a Sightholder or Accredited Buyer - are required to participate in the Contractor BPP Programme; and all non-substantial contractors must be disclosed on the BPP SMART System.

In addition, Sightholders and Accredited Buyers are required to declare all owned entities and contractors who are manufacturing melee diamonds to enable reviews to be undertaken to cover the BPP Melee Assurance Protocol requirements,

2805 eligible entities were declared, and workbooks were submitted within agreed timescales. Where entities are co-located or part of a retail brand, merged workbooks may be submitted and this resulted in 765 individual workbooks. Of these, 221 workbooks were reviewed for this cycle and rated in accordance with the BPP programme requirements.

In addition, 113 onsite verification visits were completed based on the sampling rules defined above. This included the audits undertaken at the non-substantial contractor sites involved in manufacturing melee diamonds.

OVERALL SUMMARY

De Beers Group:

Policies and procedures are now embedded into normal operations for De Beers' facilities and there is a commitment to continuous improvement against both the BPP and RJC requirements.

No Material Breaches or Major Infringements were identified during first or third party assessments and a 3-year recertification recommendation was made to the RJC resulting in a renewed certificate with validity from 13 October 2018 to 13 October 2021. 45 Improvement Opportunities were raised where entities could seek to go further in the spirit of continuous improvement.

In addition, the following provenance claims were assessed and verified by SGS during the 2018 BPP cycle and as part of the RJC certification process, and found to be compliant against the BPP requirements and RJC standards:

“De Beers Global Sightholder Sales, Namibia Diamond Trading Company and De Beers Sightholder Sales South Africa only sell rough diamonds that originate from De Beers’ owned and joint venture operations in Botswana, Canada, Namibia and South Africa from mines that are certified against the Responsible Jewellery Council standards and compliant with the Best Practice Principles.”

“Diamonds sold by De Beers Auction Sales are sourced from De Beers wholly-owned and joint-venture operations and/or approved third party producers/suppliers in line with the De Beers Responsible Sourcing Policy and the DBAS Third Party Supply Operating Model.”

“A Forevermark diamond is sourced only from a handful of carefully selected mines, ensuring that every diamond bearing the Forevermark inscription is responsibly sourced. The Forevermark responsible sourcing standards apply throughout the entire journey of a Forevermark diamond, and include a track and trace process through the bespoke Forevermark Pipeline Integrity Standard, to ensure that Forevermark diamonds are responsibly manufactured.”

Sightholders and Accredited Buyers:

Sightholders and Accredited Buyers had a more mixed performance. A total of 156 infringements were raised during the cycle of which 33 were Major Infringements with 3 raised against Business Principles and 30 against Social Requirements. In addition, 326 Improvement Opportunities were identified. These are intended to help Sightholders and Accredited Buyers towards continuous improvement, or highlight 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.

The number of infringements varies in each cycle depending on the mix of entities selected for visits as part of the sampling process. The Major Infringements in the Social requirements are still largely being found in the areas of Health & Safety (especially fire safety) and discrepancies in documentation (relating to working hours and wages). A few country specific infringements also arise due to local legislative requirements. Environmental issues account for a smaller number of findings due to the lower environmental impact of Sightholder entities.

Sightholders and Accredited Buyers have been asked to provide Corrective Action Plans and evidence of closure for all infringements, in accordance with the usual protocol, and these are reviewed by the local SGS offices. For Major Infringements, the local SGS offices actively follow-up with Sightholders and Accredited Buyers to ensure that these are completed both effectively and efficiently. For Minor Infringements, SGS reviews evidence as it is submitted by Sightholders or Accredited Buyers.

Recommendations and future developments

For the 2019 cycle the programme will include enhanced requirements on human rights and sourcing from artisanal and small-scale mining operations to better reflect changing international standards within these areas. There will also be a continuation on the requirement for Sightholders and Accredited Buyers to take more responsibility for a thorough completion of the first party workbooks and infringements will be raised where there is evidence of delays in responding to the queries in the desk-top review process or where infringements from previous cycles are not being addressed.

As in previous cycles, Sightholders and Accredited Buyers will be able to opt in for combined BPP/RJC verification with the possibility of this leading to a recommendation for RJC Certification. The RJC have launched a review of the Code of Practices Standard and any agreed changes will be aligned with the BPP requirements for future cycles.

In addition, De Beers has committed to supporting women and girls across its business (including its value chain), brand and its communities, and as part of this initiative, the BPP requirements will elevate the focus on gender diversity and inclusion within its standards.

A number of De Beers Group entities, Sightholders and Accredited Buyers provided responses to the voluntary section, Corporate Social Investment and Business Impact, which seeks to encourage participants in the BPP Programme to highlight any case studies of their projects and programmes that support the United Nations Sustainable Development Goals. This will continue in 2019 with further participation expected.



Effie Marinos
SGS United Kingdom Ltd
15 March 2019

www.uk.sgs.com

DE BEERS GROUP 2018 GRI INDEX

KEY

Under GRI Topic Specific Disclosures, the GRI topic name has been written IN CAPITALS with the related De Beers Group material impact in brackets next to it.

There are a few material impacts for which there are no corresponding GRI topics. These are labelled 'Custom' topics and have been included for completeness, as per GRI Standards guidelines.

GRI 102: GENERAL DISCLOSURES 2018

All disclosures have been assured by **Bureau Veritas** - see their statement on pages 4 and 5.

Disclosure No.	Disclosure Title	Reference, answer, additional information or reason for omission
ORGANISATIONAL PROFILE		
102-1	Name of the organization	De Beers Group
102-2	Activities, brands, products, and services	Building Forever Our Journey, April 2019 (Volume 2) - De Beers Group at a Glance (fold out cover) About De Beers Group
102-3	Location of headquarters	London, United Kingdom
102-4	Location of operations	About De Beers Group
102-5	Ownership and legal form	Group structure
102-6	Markets served	About De Beers Group
102-7	Scale of the organization	Building Forever Our Journey, April 2019 (Volume 2) - De Beers Group at a Glance (fold out cover) Group structure Financial results Production reports Financial and operational review of 2018 – see Our Progress: Financial performance and operational update Local Sightholders in 2018 (graph)
102-8	Information on employees and other workers	Total workforce in 2018 All workforce-related data for 2018 (various graphs)
Disclosure No.	Disclosure Title	Reference, answer, additional information or reason for omission
102-9	Supply chain	As an international mining company, De Beers Group has a large and complex supply chain supporting our varied operations. In 2018, our Group-wide procurement spend was just over US\$2 billion with nearly 10,000 suppliers and over 250,000 individual purchase order lines. Examples of key products and services supplied are: contracted maintenance, fuels, earthmoving machinery, drilling and cutting machinery, pumps, and lubricants. Our supply function employs 402 people globally. Through our inclusive procurement policy we support local businesses from the countries and communities where we operate. See Economic impact on producer countries

Disclosure No.	Disclosure Title	Reference, answer, additional information or reason for omission
102-10	Significant changes to the organization and its supply chain	<p>There were no new mine openings in 2018, however the following events were significant:</p> <ul style="list-style-type: none"> • In July 2018, De Beers Group announced the decision to proceed with the closure and rehabilitation of Voorspoed Mine in South Africa. The mine went into care and maintenance in the fourth quarter of 2018 and will move into full closure planning in 2019. • Victor Mine in Canada completed mining activities in the first quarter of 2019 and will continue processing the mined ore until May 2019. • Snap Lake Mine, in Canada, continued to be on care and maintenance in 2018 and will move into full closure planning in 2019. • De Beers Canada acquired Peregrine Diamonds Ltd, which includes the Chidliak diamond resource in Canada's Nunavut Territory and other properties elsewhere in Nunavut and the Northwest Territories, in September 2019. • De Beers Group launched Lightbox Jewelry™, a laboratory-grown diamond fashion jewellery brand, in the US and began selling in September 2018.
102-11	Precautionary Principle or approach	The De Beers Group Environmental Policy states our commitment to adopting a precautionary approach to environmental challenges.
102-12	External initiatives	<p>We participate in many external initiatives including:</p> <ul style="list-style-type: none"> • United Nations Sustainable Development Goals; • United Nations Global Compact; • United Nations Women Programme; • United Nations CEO Water Mandate; • Kimberley Process and System of Warranties; • Extractive Industries Transparency Initiative; • Responsible Jewellery Council; • Diamond Development Initiative; • Voluntary Principles on Security and Human Rights; • United Nations Guiding Principles on Human Rights and Business; • Convention on Biological Biodiversity's Business and Biodiversity pledge.
102-13	Membership of associations	<p>We are members of a number of industry associations including:</p> <ul style="list-style-type: none"> • Diamond Producers Association; • International Council of Mining and Metals; • World Diamond Council.
STRATEGY		
102-14	Statement from senior decision-maker	Building Forever Our Journey, April 2019 (Volume 2) - Page 3
ETHICS AND INTEGRITY		
102-16	Values, principles, standards, and norms of behavior	<p>Vision and values</p> <p>De Beers Group Code of Conduct</p> <p>Principles and policies</p>
102-17	Mechanisms for advice and concerns about ethics	<p>Anglo American confidential whistleblowing service</p> <p>Business integrity</p>

Disclosure No.	Disclosure Title	Reference, answer, additional information or reason for omission
GOVERNANCE		
102-18	Governance structure	Leadership team Sustainability governance structure
STAKEHOLDER ENGAGEMENT		
102-40	A list of stakeholder groups engaged by the organisation	Our stakeholders
102-41	Percentage of total employees covered by collective bargaining agreements	Industrial relations
102-42	Identifying and selecting stakeholders	Our stakeholders
102-43	Approach to stakeholder engagement	Our stakeholders
102-44	Key topics and concerns raised	Our impacts
REPORTING PRACTICE		
102-45	Entities included in the consolidated financial statements	All entities within De Beers Group are included in the 2018 consolidated financial statements. Debswana and Namdeb are independently managed companies but these are included due to the strategic and operational alignment of activities across the business. <i>Please note that 2017 financial figures included De Beers Jewellers (DBJ) only from the date that the company was acquired by De Beers Group (March 2017).</i>
102-46	Defining report content and topic Boundaries	Defining our impacts
102-47	List of material topics	Our impacts
102-48	Restatements of information	No restatements of information or data other than where noted (online or in the printed report) in the form of a footnote.
102-49	Changes in reporting (in the list of material topics and boundaries)	No significant changes were made to material topics or topic boundaries.
102-50	Reporting period	Quantitative performance data in both the online and print report refers to the calendar year 2018 (1 January to 31 December). Qualitative information in both the online and print report covers events from the calendar year 2018 and from the first quarter of 2019.
102-51	Date of most recent previous report	November 2018.
102-52	Reporting cycle	Reporting on our progress
102-53	Contact point for questions regarding the report	Email: buildingforever@debeersgroup.com
102-54	Claims of reporting in accordance with the GRI Standards	This report has been prepared in accordance with the GRI Standards: core option.
102-55	GRI content index	http://www.debeersgroup.com/ourjourney
102-56	External assurance	http://www.debeersgroup.com/ourjourney

GRI TOPIC SPECIFIC DISCLOSURES 2018

ECONOMIC (200)

GRI Standard	Disclosure No.	Disclosure Title	Reference, answer, additional information or reason for omission
ECONOMIC PERFORMANCE (Economic impact on producer countries; Partnerships)			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Anglo American Annual Report 2018, pages 54 - 56 Partnerships Economic impact on producer countries Transparency
GRI 201: Economic Performance 2018	201-1	Direct economic value generated and distributed	Payments to stakeholders (graph)
	201-4	Financial assistance received from government	No significant financial assistance was received from governments in 2018.
MARKET PRESENCE (Economic impact on producer countries; Employee attraction, development and diversity)			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Economic impact on producer countries Employee attraction, development and diversity
GRI 202: Market Presence 2018	202-2	Proportion of senior management hired from the local community	Locally and historically disadvantaged employees in management (graph)
	MMG4-EC6	In significant locations of operation, report proportion of the facility's total workforce from the local community	Workforce based in Africa (graph)

GRI Standard	Disclosure No.	Disclosure Title	Reference, answer, additional information or reason for omission
INDIRECT ECONOMIC IMPACTS (Economic impact on producer countries; Community development for producer countries)			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Economic impact on producer countries Community development
GRI 202: Indirect Economic Impacts 2018	203-1	Infrastructure investments and services supported	Financial and operational review of 2018 – see Our Progress: Financial performance and operational update
	203-2	Significant indirect economic impacts	Building Forever Our Journey, April 2019 (Volume 2) - Pages 4 - 9 Economic impact on producer countries Community development Partnerships
PROCUREMENT PRACTICES (Economic impact on producer countries)			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Economic impact on producer countries
GRI 204: Procurement Practices 2018	204-1	Proportion of spending on local suppliers	Inclusive procurement as a proportion of total spend (graph)
ANTI-CORRUPTION (Business integrity)			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Business integrity De Beers Group Code of Conduct Anglo American Business Integrity Policy

GRI Standard	Disclosure No.	Disclosure Title	Reference, answer, additional information or reason for omission
GRI 205: Anti-corruption 2018	205-1	Operations assessed for risks related to corruption	Business integrity Business integrity self-assessments (graph)
	205-2	Communication and training about anti-corruption policies and procedures	Business integrity
ANTI-COMPETITIVE BEHAVIOUR (Business integrity)			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Business integrity De Beers Group Code of Conduct Anglo American Business Integrity Policy
GRI 204: Anti-competitive behaviour 2018	206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Business integrity
Partnerships (De Beers Group custom topic)			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Building Forever Our Journey, April 2019 (Volume 2) - Page 6 (UN Women Partnership) Partnerships
Consumer demand for diamonds (De Beers Group custom topic)			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Consumer demand for diamonds Building Forever Our Journey, April 2019 (Volume 2) - Pages 22 - 27
Transparency (De Beers Group custom topic)			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Transparency

ENVIRONMENTAL (300)

GRI Standard	Disclosure No.	Disclosure Title	Reference, answer, additional information or reason for omission
ENERGY (Energy security)			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Energy security Environment overview De Beers Group Environmental Policy
GRI 302: Energy 2018	302-1	Energy consumption within the organization	Direct and indirect energy use (graph)
	302-4	Reduction of energy consumption	Energy security
WATER (Water availability and quality)			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Water availability and quality Environment overview De Beers Group Environmental Policy
GRI 303: Water 2018	303-1	Water withdrawal by source	Water withdrawal by source (graph)
BIODIVERSITY (Biodiversity and conservation)			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Building Forever Our Journey, April 2019 (Volume 2) - Page 11 Biodiversity and conservation Building Forever: Protecting the natural world Environment overview De Beers Group Environmental Policy
GRI 304: Biodiversity 2018	304-2	Significant impacts of activities, products, and services on biodiversity	Biodiversity and conservation
	304-3	Habitats protected or restored	Building Forever Our Journey, April 2019 (Volume 2) - Pages 10 - 15 Table 1 (below): Closure and rehabilitation status across De Beers Group, 2018. Biodiversity and conservation

GRI Standard	Disclosure No.	Disclosure Title	Reference, answer, additional information or reason for omission
GRI G4: Mining and metals sector supplement	MM1	Amount of land (owned or leased, and managed for production activities or extractive use) disturbed or rehabilitated	Table 1 (below): Closure and rehabilitation status across De Beers Group, 2018. Land conserved versus land altered (graph) Biodiversity and conservation
	MM2	The number and percentage of total sites identified as requiring biodiversity management plans according to stated criteria, and the number (percentage) of those sites with plans in place	Biodiversity plans (graph)
EMISSIONS (Climate change)			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Building Forever Our Journey, April 2019 (Volume 2) - Page 11 Climate change Environment overview De Beers Group Environmental Policy
GRI 305: Emissions 2018	305-1	Direct (Scope 1) GHG emissions	CO2 equivalent emissions graph Climate change
	305-2	Energy indirect (Scope 2) GHG emissions	CO2 equivalent emissions (graph) Climate change The GHG Protocol Scope 2 guidance revision to location-based and market-based reporting is not current practice in Anglo American plc, and therefore in De Beers Group. Our reporting is based on only location-based emissions equivalents but we are currently assessing the change.
	305-7	Nitrogen oxides (NOX), sulfur oxides (SOX), and other significant air emissions	Sulphur dioxide and nitrogen dioxide emissions (graph)
EFFLUENTS AND WASTE (Waste management and pollution prevention)			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Waste management and pollution prevention Environment overview De Beers Group Environmental Policy

GRI Standard	Disclosure No.	Disclosure Title	Reference, answer, additional information or reason for omission
GRI 306: Effluents and waste 2018	306-2	Waste by type and disposal method	Waste (various graphs)
	306-3	Significant spills	No significant spills occurred in 2018. Environmental incidents by severity and by type (graphs)
	MMG4-MM8	Total amounts of overburden, rock, tailings and sludges and their associated risks	Waste management and pollution prevention
ENVIRONMENTAL COMPLIANCE			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Environment overview Table 2 (below): Environmental management activities across the mining lifecycle, 2018. De Beers Group Environmental Policy
GRI 307: Environmental compliance 2018	307-1	Non-compliance with environmental laws and regulations	The De Beers Group of Companies was not subject to any significant fines or non-monetary sanctions for non-compliance with environmental laws and regulations in 2018. For information on the ongoing legal case between environmental group the Wildlands League and De Beers Canada regarding mercury monitoring near victor mine, see Water Availability and Quality
	Custom	Compliance with De Beers Group's environmental management standards	Compliance with De Beers Group's Environmental Management Standards (graph)

GRI Standard	Disclosure No.	Disclosure Title	Reference, answer, additional information or reason for omission
SUPPLIER ENVIRONMENTAL ASSESSMENT (Diamond Pipeline Integrity)			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Building Forever Our Journey, April 2019 (Volume 2) - Page 24 Diamond pipeline integrity
GRI 308: Supplier Environmental Assessment 2018	308-1	New suppliers that were screened using environmental criteria	All of De Beers Group's Sightholders, Accredited Buyers and substantial contractors abide by De Beers Group's Best Practice Principles Assurance Programme (BPP), through participation in the associated BPP assurance process. The BPP programme includes requirements around good environmental practices. Diamond pipeline integrity
CLOSURE PLANNING (Sector specific topic) (Mine closure and asset transfer)			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Building Forever Our Journey, April 2019 (Volume 2) - Pages 14 and 15 Mine closure
GRI G4: Mining and metals sector supplement	MM10	Number and percentage of operations with closure plans	Mine closure

Table 1: CLOSURE AND REHABILITATION STATUS ACROSS DE BEERS GROUP, 2018

SOUTH AFRICA
<p>The Oaks, Limpopo Province The Oaks open-pit mine ceased production in 2008. Active restoration has been concluded and a project to review open-pit closure criteria globally was conducted to inform the final closure arrangements. Water quality sampling, as well as vegetation monitoring is ongoing. Discussions and agreements with the Department of Mineral Resources are ongoing as to achievement of agreed closure criteria, in line with legislation.</p> <p>Namaqualand, Northern Cape Province The sale of Namaqualand Mines was completed in 2014. De Beers Consolidated Mines retained the rehabilitation liabilities in the Buffels Marine Right with an altered land footprint of 3,652 ha. Rehabilitation of the areas disturbed by many decades of mining remains ongoing. All land reclamation and profiling work was completed in 2015 with around 35 million cubic metres of earth having been reclaimed over a period of eight years. The mine lies in the Succulent Karoo Biome so restoration of biodiversity is important. Various areas across the landscape have been subject to active ecological intervention in the form of netting, seeding and transplanting, and these are being monitored. The severe drought conditions experienced throughout the region persisted during 2018, further exacerbating the negative impact on ecological interventions. During 2018, work continued on a number of general clean-up projects. The Environmental Authorisation application required to commence the demolition of redundant infrastructure was approved in mid-December 2018.</p> <p>Kimberley Exploration, Northern Cape Province As part of decommissioning of the Exploration Geology Pit in Kimberley, which ceased operations in 2005, water monitoring, vegetation assessments and removal of any alien invader plants continue according to the comprehensive five-year closure plan in line with legal requirements.</p> <p>Voorspoed Mine, Free State Province The Board of De Beers Consolidated Mines (DBCM) announced the closure of Voorspoed Mine in July 2018. Production ceased in Q4 2018 and execution of the closure and rehabilitation programme commenced in Q1 2019. The rehabilitation programme is underpinned by the following specific objectives:</p> <ul style="list-style-type: none"> • Restore as much as possible of the mining area to a condition consistent with the pre-determined post closure land use objectives; • Ensure that the area is left in a condition which poses an acceptable level of risk to public health and safety; and • Reduce as far as is practicably possible the need for post closure intervention, either in the form of monitoring or on-going remedial work.
NAMIBIA
<p>As part of the comprehensive Namdeb Legacy Rehabilitation Project, the status is as follows:</p> <ul style="list-style-type: none"> • A dedicated resource was assigned to be part of the integrated closure planning project for Namdeb of which biophysical closure forms an integral part. • Namdeb is in the process of updating and reviewing its biophysical rehabilitation plan. The deliverables in the plan are also aligned to Anglo American (AA) requirements. Site visits and discussions on the domain approach with the consultant took place. • A site visit is envisaged with AA Principal Rehabilitation in the first week of April 2019 to ensure the 5-year rehabilitation plan is aligned with Group requirements. • More than 134 000 tons of scrap steel has been removed as part of the Scrap Removal Joint Venture since the inception of the project in 2008. • The demolition project is still continuing. 2019 will include a review of the current demolition project to ensure it is optimised and to also plan for activities beyond 2019 and within the current life of mine (LOM) plan. • Biophysical closure cost provisioning is cash flowed as part of LOM planning. • Closure cost provisioning continues to be annually audited by an external party. • Concurrent rehabilitation (backfilling and revegetation) forms part of the Sendelingsdrif and Obib mines. The activities are tracked via the multidisciplinary Rehabilitation Task Team.

Table 1 Continued

BOTSWANA
<p>Exploration – Lobatse Sample Treatment Centre</p> <p>In terms of the closure process, the rehabilitation and monitoring programme, including public review and stakeholder engagement processes, has been completed in full compliance with the government approved Preliminary Environmental Impact Assessment. The final report was submitted to government in April 2016; followed by a site verification visit in August 2017. Government has approved the closure and a process is currently underway with Anglo American, which owns the property, for a decision on future use or sale.</p>
CANADA
<p>Snap Lake</p> <p>Detailed closure planning for the Snap Lake Mine site was completed in 2018. Final detailed designs for all facilities were developed and a Final Closure and Reclamation Plan (FCRP), which meets the Anglo American Closure Toolbox requirements, was completed. The FCRP addresses closure of the mineral residue facility, demolition of site infrastructure, revegetation of the project area and water treatment. A land use permit amendment and water licence renewal application were submitted, along with the FCRP, to the regulator in March of 2019. A one-year long process of review is expected prior to receipt of the approvals necessary to demolish and rehabilitate the site. The mine site will remain in extended care and maintenance until plans are approved for closure.</p> <p>Victor</p> <p>Victor Mine completed several important studies related to water quality, landform, and pit re-filling in 2018. These studies confirmed the current design for the closing mineral residue facilities and managing site water into closure. The Final Closure and Reclamation Plan (FCRP) was submitted to the Provincial Regulators in Q2 2018. Following receipt of stakeholder review comments, the FCRP was revised and re-submitted in Q1 of 2019. De Beers anticipates approval of the FCRP in Q2 of 2019. An additional landfill will be required to support demolition. An application for a demolition landfill was prepared and submitted in 2018. Approval of the demolition landfill is expected in Q2 2019. De Beers stopped mining ore from the pit in March of 2019, 11 years to the day from the start of mining in 2008. Stockpiled ore will be processed in the Plant until May at which point the Plant will be de-commissioned and prepared for demolition. Reclamation of the Victor mine site will continue throughout 2019 with soil placement, seeding and planting.</p>

Table 2: ENVIRONMENTAL MANAGEMENT ACTIVITIES ACROSS THE MINING LIFECYCLE, 2018

Phase	Activity	Objective	2017 Action/Key Projects
Conceptual	Environmental and social screening	To establish if the proposed project has the potential to generate significant or unacceptable environmental or social impacts	<ul style="list-style-type: none"> • Lethakane Underground • Orapa Underground • Jwaneng Underground • Venetia Stormwater Control
Pre-feasibility	Scoping	To gather and evaluate information and undertake specialist studies for the Environmental and Social Impact Assessment (ESIA)	<ul style="list-style-type: none"> • Orapa Cut 3 • Orapa Process Plant Optimisation
Feasibility	Environmental and Social Impact Assessment and Environmental and Social Management Plan (ESMP) or Environmental Management Plan (EMP)	To identify, qualify and quantify project impacts on the biophysical, socio-economic, heritage, aesthetic and cultural environments. To document and detail future monitoring and management requirements outlined in the ESIA and develop closure plans in line with the life of mine	<ul style="list-style-type: none"> • Jwaneng Cut 9 • Additional Mining Vessel 3 • Coral Sea Process Plant De-bottlenecking
Construction or commissioning		To ensure inclusion of all requirements of the EMP for the operational phase, for smooth transition to the operational phase	<ul style="list-style-type: none"> • Lethakane Tailing Mineral Resource Treatment Plant • Orapa Fines Residue Disposal • Venetia Underground
Operations	Environmental management systems (EMS)	To ensure ISO 14001 compliant EMS are in place at all diamond mining operations, to guide the management of our operational environmental impacts and promote continual improvement in environmental performance and implementation of concurrent rehabilitation	All mines and key facilities are ISO 14001 certified and by September 2018 all certified sites transitioned to the 2015 version of the standard.
Closure/disposal	Closure plans/liabilities	To have a closure plan for each mine that has the appropriate level of detail applicable to the remaining life of mine and ensure adequate financial provision for outstanding environmental liabilities. To implement a final closure plan once production ceases.	Closure and rehabilitation of various sites (see details in table 1)

SOCIAL (400)

GRI Standard	Disclosure No.	Disclosure Title	Reference, answer, additional information or reason for omission
EMPLOYMENT			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Employee attraction, development and diversity
GRI 401: Employment 2018	401-1	New employee hires and employee turnover	Employee turnover (various graphs) Employee attraction, development and diversity
LABOUR/MANAGEMENT RELATIONS (Industrial relations)			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Industrial relations
GRI 402: Labour/ Management relations 2018	402-1	Minimal notice periods regarding operational changes.	We do not have an overarching policy at Group level on notice periods regarding operational changes. Business units in each of our diamond-producing countries have their own tailored policies.
OCCUPATIONAL HEALTH AND SAFETY (Safety; Health and Wellness)			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Building Forever Our Journey, April 2019 (Volume 2) - Page 20 Health and wellbeing Safety De Beers Group Occupational Health Policy De Beers Group Safety Policy
	403-3	Workers with high incidence or high risk of diseases related to their occupation	Occupational Health and Employee health and wellbeing (various graphs) Health and wellbeing

GRI Standard	Disclosure No.	Disclosure Title	Reference, answer, additional information or reason for omission
TRAINING AND EDUCATION (Employee attraction, development and diversity)			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Employee attraction, development and diversity
GRI 404: Training and Education 2018	404-1	Average hours of training per year per employee	Employee attraction, development and diversity
	404-3	Percentage of employees receiving regular performance and career development reviews	Across De Beers Group, 100 per cent of employees within the non-unionised workforce are included in a performance management system where objectives are set, development is discussed, and feedback is provided. Employees in the unionised workforce negotiate as a group and do not take part in these reviews..
DIVERSITY AND EQUAL OPPORTUNITY (Employee attraction, development and diversity; Standing with women and girls)			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Building Forever Our Journey, April 2019 (Volume 2) - Pages 17-19 Employee attraction, development and diversity Standing with women and girls Building Forever: Standing with women and girls De Beers Group Employee Human Rights Policy
GRI 405: Diversity and Equal Opportunity 2018	405-1	Diversity of governance bodies and employees	Diversity and inclusion (various graphs) Employee attraction, development and diversity Standing with women and girls Leadership team
NON-DISCRIMINATION (Human Rights)			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Human rights De Beers Group Employee Human Rights Policy
GRI 406: Non-discrimination 2018	406-1	Incidents of discrimination and corrective actions taken	Seven incidents of discrimination were reported across the Group during 2018. Five cases were investigated and corrective actions were taken and completed. A further two have been investigated and are still in progress.

GRI Standard	Disclosure No.	Disclosure Title	Reference, answer, additional information or reason for omission
FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING (Human rights; Industrial relations)			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Human rights De Beers Group Employee Human Rights Policy
GRI 407: Freedom of association and collective bargaining 2018	407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	Industrial relations
CHILD LABOUR (Human rights)			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Human rights De Beers Group Employee Human Rights Policy
GRI 408: Child Labour 2018	408-1	Operations and suppliers at significant risk for incidents of child labor	Human rights
FORCED OR COMPULSORY LABOUR (Human rights)			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Human rights De Beers Group Employee Human Rights Policy
GRI 409: Forced or compulsory labour 2018	409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labour.	Human rights
SECURITY PRACTICES (Human rights)			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Human rights De Beers Group Security Forces and Human Rights Policy
GRI 410: Security practices 2018	410-1	Security personnel trained in human rights policies or procedures	Human rights

GRI Standard	Disclosure No.	Disclosure Title	Reference, answer, additional information or reason for omission
RIGHTS OF INDIGENOUS PEOPLES (Indigenous communities)			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Indigenous communities De Beers Group Social Performance Policy
GRI 411: Rights of indigenous peoples 2018	411-1	Incidents of violations involving rights of indigenous peoples	Indigenous communities
GRI G4 Mining and metals sector supplement	MM5	Total number of operations taking place in or adjacent to Indigenous Peoples' territories, and number and percentage of operations or sites where there are formal agreements with Indigenous Peoples' communities	Indigenous communities
HUMAN RIGHTS ASSESSMENT (Diamond pipeline integrity; Human rights)			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Human rights Diamond pipeline integrity De Beers Group Modern Slavery Act statement
GRI 412: Human rights assessment 2018	421-1	Operations that have been subject to human rights reviews or impact assessments	Human rights Diamond pipeline integrity De Beers Group 2017 Modern Slavery Act statement
	412-2	Employee training on human rights policies or procedures	Human rights
	412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	Human rights

GRI Standard	Disclosure No.	Disclosure Title	Reference, answer, additional information or reason for omission
LOCAL COMMUNITIES (Community development for producer countries)			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Building Forever Our Journey, April 2019 (Volume 2) - Pages 4-7 Community development De Beers Group Social Performance Policy
GRI 412: Local communities 2018	413-1	Operations with local community engagement, impact assessments, and development programs	Community development
	413-2	Operations with significant actual and potential negative impacts on local communities	Community development
SUPPLIER SOCIAL ASSESSMENT (Diamond pipeline integrity)			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Building Forever Our Journey, April 2019 (Volume 2) - Page 24 Diamond pipeline integrity De Beers Group 2017 Modern Slavery Act statement
GRI 414: Supplier Social Assessment 2018	414-1	New suppliers that were screened using social criteria	All of De Beers Group Sightholders, Accredited Buyers and substantial contractors abide by the De Beers Group's Best Practice Principles Assurance Programme (BPP), through participation in the associated BPP assurance process. The BPP programme includes requirements around human rights, labour rights, and transparent product disclosure. Diamond pipeline integrity
PUBLIC POLICY			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Principles and policies De Beers Group Code of Conduct
GRI 415: Public Policy 2018	415-1	Political contributions	No political contributions were made in 2018.

GRI Standard	Disclosure No.	Disclosure Title	Reference, answer, additional information or reason for omission
MARKETING AND LABELLING (Conflict diamonds)			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Building Forever Our Journey, April 2019 (Volume 2) - Pages 22 -27 Conflict diamonds
GRI 417: Marketing and Labeling 2018	417-1	Requirements for product and service information and labeling	Building Forever Our Journey, April 2019 (Volume 2) - Pages 22 - 27 Conflict diamonds Diamond pipeline integrity
	417-2	Incidents of non-compliance concerning product and service information and labeling	Conflict diamonds
	417-3	Incidents of non-compliance concerning marketing communications	There were no incidents of non-compliance with regulations and/or voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship in 2018.
CUSTOMER PRIVACY			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Business integrity De Beers Group Code of Conduct
GRI 418: Customer Privacy 2018	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	There were no substantiated complaints regarding breaches of customer privacy in 2018, either from outside parties or from regulatory bodies.
SOCIOECONOMIC COMPLIANCE			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Business integrity De Beers Group Social Performance Policy Anglo American Business Integrity Policy
GRI 419: Socioeconomic compliance 2018	419-1	Non-compliance with laws and regulations in the social and economic area	De Beers Group was not subject to any significant fines or non-monetary sanctions for non-compliance with economic or social laws and regulations in 2018.

GRI Standard	Disclosure No.	Disclosure Title	Reference, answer, additional information or reason for omission
ARTISINAL AND SMALL SCALE MINING (Sector specific topic) (Informal mining)			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Building Forever Our Journey, April 2019 (Volume 2) - Page 9 Informal mining De Beers Group Social Performance Policy
GRI G4: Mining and metals sector supplement	MM8	Number and percentage of company operating sites where artisanal and small-scale mining (ASM) takes place on, or adjacent to, the site; the associated risks and the actions taken to manage and mitigate these risks	Informal mining
LAND ACCESS AND RESETTLEMENT (Sector specific topic)			
GRI 103: Management Approach 2018	103-1/2/3	Explanation of the material topic and its boundary; Components of the management approach; Evaluation of the management approach.	Land access and resettlement Community development De Beers Group Social Performance Policy
GRI G4: Mining and metals sector supplement	MM6	Number and description of significant disputes relating to land use, customary rights of local communities and Indigenous Peoples	Land access and resettlement
	MM7	The extent to which grievance mechanisms were used to resolve disputes relating to land use, customary rights of local communities and Indigenous Peoples, and the outcomes	Land access and resettlement

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