

## **Petra Diamonds Limited**

### **Modern Slavery Act Transparency Statement**

### **for the financial year ended 30 June 2025**

This statement is made by Petra Diamonds Limited (**Petra**) pursuant to section 54 of the UK Modern Slavery Act, 2015 (the **Act**) and has been approved by Petra's Board of Directors.

In accordance with guidance published by the UK Government, Petra publishes this statement on behalf of each of its subsidiaries which may be subject to the Act (hereinafter referred to as the **Group**).

This statement sets out the steps that have been taken by Petra and the Group to prevent occurrences of slavery or human trafficking in its businesses in the financial year ended 30 June 2025 (**FY 2025** or **the Year**).

#### **Petra's commitment**

Petra is committed to ethical and responsible business practices with all our stakeholders. We monitor and manage each step in our diamond mining process and modern slavery; human trafficking and human rights abuses are not tolerated in our business.

#### **About Petra and its workforce**

Petra is an independent diamond mining group, supplying gem quality rough diamonds to the international market. The Group's portfolio currently consists of interests in two underground mines in South Africa (the Cullinan and Finsch Mines) after the sale of its mine in Tanzania (Williamson). Petra also has diamond marketing offices in Johannesburg and Antwerp; its South African head office is in Johannesburg and its group management office in London.

As at 30 June 2025, Petra and its subsidiaries had 4034 staff (consisting of 1911 permanent employees and 2132 contractors), with the majority of our people based at mining operations in South Africa. None of our employees or contractors are engaged on a seasonal basis.

#### **Our supply chain**

Petra sources the majority of the goods and services for our operations from South Africa, where they are located. Where goods or technology are supplied by international companies, these will, as far as possible, be procured through a locally registered supplier in our host country. We view targeted local procurement, which is a legislative requirement, as a powerful lever for local economic development and community empowerment and preference is given to suppliers near our mines as and where possible.

We recognise that the risk of human rights violations, modern slavery and human trafficking are more acute in sectors where supply chains are labour intensive and in jurisdictions with a high level of adverse socio-economic conditions. In light of this, and given the complexity of our activities, Petra's governance and risk management processes and systems are purposefully tailored to assess and mitigate the risk of modern slavery and human trafficking within our business.

#### **Governance, policies and standards**

Petra has the following policies relating to safeguarding against human right violations, human trafficking and modern slavery risk:

- our Code of Ethical Conduct (the **Code**) affirms Petra's commitment to operating legally and ethically, in a manner which is free from human rights violations. The Code makes it clear that we shall not tolerate child, forced or bonded labour in any of our operations or by any suppliers working for us. The Code is available on Petra's website (see <https://www.petradiamonds.com/wp-content/uploads/Petra-Diamonds-Code-of-Conduct-reduced.pdf>);
- the Code requires that appropriate risk-based due diligence is completed in relation to our suppliers, consistent with the terms set out in Petra's Ethics and Compliance Due Diligence Policy and Supplier

Compliance Due Diligence Procedure. Under the Code, all staff are required to ensure that appropriate risk-based due diligence has been considered in the selection of suppliers; and

- Petra's Human Rights Policy Statement sets out our commitment to upholding human rights standards. This includes, but is not limited to, being guided by the UN Universal Declaration of Human Rights, the Voluntary Principles on Security and Human Rights (**VPSHR**) and the UN Guiding Principles on Business and Human Rights. Petra has also developed and adopted a Respecting Human Rights Defenders Procedure which reiterates our commitment to respecting the rights of human rights defenders or anyone raising concerns about our activities.
- To reinforce compliance with the Code, management employees are required to undergo an annual certification process, which confirms their understanding and compliance with the Code. Other employees receive training on the Code which forms part of their annual refresher training.

Under the Code, and in accordance with Petra's Whistleblowing Policy, all employees have a duty to speak up if they see behaviour or conduct in contravention of the Code and to do this either through their line managers, Petra's Risk, Assurance and Compliance team or Petra's independent and confidential whistleblowing hotline. In addition, under the Code, those members of staff who manage a contract or relationship with our suppliers are required to, amongst other things:

- proactively monitor performance and delivery of, and compliance with, the contractual terms (which include an undertaking not to violate human rights;
- encourage suppliers and other business partners to raise any ethical challenges or concerns and ensure they are fully supported in resolving these; and
- immediately report any activity or behaviours which breaches applicable law or the Code.

Petra's whistleblowing hotline is managed by Deloitte, an independent, external third party which provides a secure speaking up service, with the confidentiality of the whistleblower being maintained and Petra being unable to influence or amend any concerns which are reported. The hotline is available 24 hours a day, seven days a week and concerns can be raised by telephone, SMS (short message service) or email. The hotline and tip-off service can also be utilised by any member of the public to report their concerns, including, for example, the staff of Petra's suppliers. To further support this, purchase orders issued for Petra's South African operations contain details of Petra's whistleblowing hotline.

## Supplier due diligence

Petra seeks to mitigate slavery, human trafficking and human rights abuse risks relating to our suppliers through conducting annual workshops with our suppliers at our operations and due diligence processes undertaken by our Supply Chain function, with support and advice from our Risk, Assurance and Compliance function.

Petra has adopted and implemented an Ethics and Compliance Due Diligence Policy and Supplier Compliance Due Diligence Procedure which requires that an initial risk assessment be undertaken to determine the risk level associated with each new supplier. The outcome of this risk assessment determines the level of due diligence that is then undertaken in respect of such supplier, with medium and higher risk suppliers being issued with detailed questionnaires. For higher risk suppliers, enhanced due diligence reports may also be commissioned from independent specialist providers. Due diligence is undertaken and recorded through an online automated workflow management platform which is designed to improve efficiency and reduce the burden for Petra's business and its suppliers. Once suppliers have been entered onto the online platform, they are subject to continuous automated background screening by the platform which highlights, amongst other things, adverse media reports which can include allegations of modern slavery, child labour or indentured labour relating to the supplier in question, including criminal cases where individuals or companies are convicted or found guilty of modern slavery breaches and pending modern slavery criminal or civil cases.

## Undertakings provided by suppliers

Petra's 'General Terms and Conditions of Contract' (the **Supplier GTCs**) require suppliers to:

- undertake not to use “...forced, bonded, indentured or voluntary prison labour nor child labour...”;
- “...respect those human rights which are within its sphere of influence...”;
- comply with all applicable labour laws, as well as “...best practice relating to the avoidance of...modern slavery...in all jurisdictions to which it is subject and any related rules or regulations”; and
- comply at all times and act in a manner consistent with all applicable laws, regulations and/or principles.

In the event of a breach by a supplier of the above clauses of Petra’s GTCs, Petra has the right to terminate its contract with immediate effect, with no further liability whatsoever. Petra also has the right to request further information from suppliers under Petra’s GTCs to ascertain whether they are in compliance with these obligations.

In addition, suppliers are also explicitly required, under Petra’s GTCs, to comply with the Code and if they breach this undertaking and fail to cure the breach this also gives Petra a termination right.

## Developments in FY 2025 and next steps

### Embedding third party due diligence procedures

As previously reported, Petra adopted its Ethics and Compliance Due Diligence Policy and Supplier Compliance Due Diligence Procedure in FY 2023. During FY 2025, Petra continued to implement and embed its Ethics and Compliance Due Diligence Policy and Supplier Compliance Due Diligence Procedure.

### Supply chain review and project

During FY 2025, Petra implemented a cloud-based Supply Chain management system to help streamline and automate procurement, invoicing and payment processes. One of the key features of this system is the ability of suppliers to upload key documentation to satisfy Petra’s ‘Know Your Customer’ protocols.

In order to drive further cost savings, increase efficiency and enhance collaboration, Petra has also revisited its Supply Chain operating model and transitioned to an outsourced model with a seasoned and leading service provider in this area. The project is in its infancy stages however is envisaged for implementation within the short term, targeting completion prior CY 2025.

### Annual Code certification; supplier workshops

Workshops targeting key suppliers were recently concluded at operations raising awareness with the provisions of the Code and to reiterate Petra’s compliance expectations. Workshops for management-level are due to be held in FY 2026, followed by annual certifications.

**Vivek Gadodia**



**Juan Kemp**



**Joint Chief Executive Officers  
Petra Diamonds Limited  
15 October 2025**

*This statement has been considered and approved by Petra’s Board of Directors.*