

**FIRESTONE DIAMONDS LIMITED
("COMPANY")**

HUMAN RIGHTS POLICY

CONTENTS

CLAUSE

1.	Introduction	1
2.	Policy statement.....	1
3.	Human Rights Commitment	1
4.	Who must comply with this policy?	2
5.	Training and communication	3
6.	Disputes and Grievances	3
7.	Who is responsible for the policy?	3
8.	Monitoring and review	3

1. INTRODUCTION

- 1.1 Firestone Diamonds Limited is a responsible, independent mining company and consistent supplier of rough diamonds to the international market through its majority-owned subsidiary, Liqhobong Mining Development Co. (Pty) Ltd. The Company together with all its subsidiaries is hereinafter referred to as the **“Firestone Group.”**
- 1.2 The Firestone Group is committed to the responsible development and operation of its assets for the benefit of all of its stakeholders and conducts its business in a manner that respects the human rights and dignity of all people.
- 1.3 Respect for the human rights of all individuals within any area that the Firestone Group has an impact on is a fundamental component of its commitment to ethical business conduct and corporate social responsibility.
- 1.4 The development of this policy was guided by the following:
 - (a) The Universal Declaration of Human Rights;
 - (b) UN Guiding Principles on Business and Human Rights;
 - (c) The Voluntary Principles on Security and Human Rights;
 - (d) ILO Declaration on Fundamental Principles and Rights at work;
 - (e) UN Corporate Responsibility to Respect Human Rights: An Interpretive Guide; and
 - (f) All of the applicable laws on human rights in the countries where we operate.

2. POLICY STATEMENT

The Company has zero tolerance for human rights violations, is committed to the avoidance of any human rights infringements, and addresses any adverse human rights impacts where they may be attributable to its operations.

3. HUMAN RIGHTS COMMITMENTS

- 3.1 The Firestone Group will:
 - (a) Avoid causing or contributing to any adverse impact on human rights through its business activities, and will address such impacts promptly should they occur;
 - (b) Seek to prevent or mitigate any adverse impact on human rights that may be linked to its operations, even if it has not actively contributed to those impacts;
 - (c) Integrate its commitment to human rights into all relevant policies and procedures of the Firestone Group;
 - (d) Ensure the delivery of training on human rights for all employees and contractors of the Firestone Group as part of its induction process and

deliver ongoing training to achieve an informed workplace culture where human rights are prioritised and respected at its operations;

- (e) Ensure that it establishes and promotes accessible mechanisms for stakeholders to report, raise concerns, and seek remedy for any human rights infringement;
- (f) Develop, or participate in, effective mechanisms for fielding and addressing grievances from individuals & communities who may be adversely impacted by the Firestone Group's operations;
- (g) Implement a human rights due diligence process to identify, prevent, mitigate, monitor, and manage potential human rights risks and impacts to uphold its commitment to avoid causing or contributing to adverse human rights impacts; to address impacts when or if they may occur; and to seek to prevent or mitigate adverse human rights impacts that may be directly linked to its operations;
- (h) Ensure the effective implementation of supply chain policies that clearly communicate the Firestone Group's expectation of its contractors and suppliers to respect human rights, and to submit to its human rights due diligence processes.

3.2 The Company respects the rights and dignity of its employees and contractors and is committed to the principles of equal opportunity and fair employment for all and will not tolerate any form of discrimination or harassment, and opposes any form of forced, compulsory, or child labour. The Company respects its employee's rights to freedom of association and effective engagement in collective bargaining processes.

3.3 The Company is committed to the health, safety, and well-being of all people involved in the business operations of the Firestone Group and will prioritize initiatives to foster a safe, just, and favorable workplace culture for all employees and contractors.

3.4 The Company respects the customs, values, traditions, and cultures of the communities surrounding its operations and will deal respectfully with issues of access to land and will mitigate any environmental impacts including access to clean water, and avoid damaging as far as possible the right to livelihoods.

3.5 The Company will ensure the protection of persons and assets in a responsible manner, aligned with any applicable laws, and is committed to the implementation of the Voluntary Principles on Security and Human Rights which provide a framework to maintain the safety and security of its operational activities based on respect for human rights. The Company will require its private security contractors to respect human rights and the responsible use of force.

4. WHO MUST COMPLY WITH THIS POLICY?

This policy applies to:

4.1 Any entity within the Firestone Group;

- 4.2 Any joint venture controlled by an entity in the Group; and
- 4.3 All employees, contractors, officers, and directors of the Firestone Group.

5. TRAINING AND COMMUNICATION

- 5.1 Training on this policy will form part of the Firestone Group's induction process for all new employees and contractors. All existing employees and contractors will receive regular, relevant training on adherence to this policy.
- 5.2 This Policy will be posted on the Company's website and be publicly available.
- 5.3 The Company's zero-tolerance approach to any human rights infringements must be communicated to all suppliers, contractors, and business partners at the outset of its business relationship with them and as appropriate thereafter.

6. DISPUTES AND GRIEVANCES

- 6.1 The Company's approach to resolving any dispute or grievance concerning any adverse impact on human rights is based on respect, engagement, and dialogue with stakeholders and communities that may be affected by the Firestone Group's operations.
- 6.2 Any employee or contractor is encouraged to refer to the Company's Whistleblower Policy and the reporting mechanisms implemented to give effect to that Policy, to report an infringement of human rights to the Company.

7. WHO IS RESPONSIBLE FOR THE POLICY?

- 7.1 The Board of the Company has overall responsibility for ensuring this policy complies with its legal and ethical obligations, that all those under its control comply with it, and will monitor and report on alleged violations of human rights.
- 7.2 Management of the Firestone Group is responsible for ensuring adherence to the principles of human rights and the implementation of all of these principles in all Firestone Group policies and procedures.

8. MONITORING AND REVIEW

- 8.1 The Board of the Company will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy, and effectiveness.
- 8.2 All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected human rights infringements.

Adopted at the board meeting of the Company on 30 May 2023