



**DIAMOND TRADING
COMPANY BOTSWANA**
CODE OF CONDUCT



DTC Botswana
Pride and prosperity through diamonds

OUR VALUES



Put Safety first

We consider all risks to people and the environment before proceeding with any activity.

We address risks before beginning any activity, even if this means stopping a task. Zero harm is always our goal.



Be Passionate

We will Be Passionate by:

- Taking pride in our work and our organisation
- Showing personal dedication and going the extra mile
- Personally contributing to customer service delivery excellence
- Continuously developing our skills and learning more about our product, organisation and industry
- Delivering results of high quality



Pull Together

We will Pull Together by:

- Working together to achieve our common goals
- Actively promoting teamwork
- Collaborating across departments and functions
- Acknowledging every person's diverse background and talents
- Recognising each person's contribution to our success and building one another up



Build Trust

We will Build Trust by:

- Being honest and ethical
- Delivering on our promise
- Being open, fair and consistent
- Encouraging one another to stand up for what we believe is right
- Listening actively to understand one another better



Show We Care

We will Show We Care by:

- Taking responsibility for our impact on others and on the company
- Being sensitive to the need of the people around us and offering support
- Showing respect for one another
- Treating others as we would want them to treat us
- Caring for the environment we live in and depend on



Shape the Future

We will Shape the Future by:

- Learning from our mistakes and continuously improving what we do and how we do it
- Thinking creatively and taking calculated risks
- Delivering effectively and efficiently on demanding targets
- Making tough, consistent and fair decisions
- Rewarding those that deliver well



MESSAGE FROM THE MANAGING DIRECTOR

Dear Colleagues,

As we navigate the intricate facets of our diamond business, I want to take a moment to express my gratitude for your unwavering dedication and hard work. In the world of diamonds, precision and brilliance are paramount and each member of our team plays a crucial role in shaping the success of our company. Your commitment to excellence and your passion for our craft do not go unnoticed.

Being entrusted with our nation's precious resource – rough diamonds, calls on all DTCB's employees and business partners to uphold the highest standards of corporate governance and ethical behaviour. Good and effective corporate governance and a strong ethical culture is the cornerstone of DTCB's values, more importantly the Build Trust value.

Through building trust, we are to ensure that DTCB is never associated with any practice that is contrary to doing what is right. This includes, but is not limited to bribery, corruption and money laundering. This Code of Conduct contains principles of fairness, honesty, integrity and excellence. All DTCB stakeholders (employees, contractors and business partners) are expected to abide by this Code of Conduct. If we uphold the standards of quality and integrity that define our brand, DTCB will become a shining example of corporate governance and excellence.

Yours sincerely,



Sedireng Serumola
Managing Director





TABLE OF CONTENTS

1. OUR SHE CULTURE

Occupational Health and Safety	06
Environment	07

2. PRIORITISING OUR EMPLOYEES IS OF UTMOST IMPORTANCE

Employee Health and Wellness	08
Labor and Human Rights	09
Community Relations	13
Gender Diversity, Inclusion and Fair Treatment	14
Harassment And Bullying	15
Personal Information & Privacy	16

3. ACTING WITH INTEGRITY

Bribery	17
Political Donations	17
Gifts, Entertainment and Hospitality	18
Conflict of Interest	18
Suppliers, Customers and Other Business Partners	20
Fair Competition	20
Money Laundering And The Financing Of Terrorism	21

4. PROTECTION OF OUR ASSETS

Security Services	23
Information Security	24
Asset Care and Use	26
Communicating Externally	27
Intellectual Property	28
Safe to Speak Up	28
Whistleblowing	29

OUR SHE CULTURE

Occupational Health and Safety – Safe Operation

As a business, we are deliberately elevating Sustainability to ensure that we have a Safe and Green Operation. Among the six values that we have, “Put Safety First” is our number one priority. In DTCB, we pride ourselves with putting safety at the forefront of everything that we do as we address risks before we begin an activity.

In DTCB, we emphasise personal safety responsibility and continuously raise awareness to employees, visitors and contractors through our site rules and regulations. We also learn from incidents, to prevent repeat incidents from occurring.



Do's

- Put Safety First in everything that you do.
- Look out for your fellow workers and report any potential safety issues.
- Know and understand the safety requirements associated with the work you are doing.
- Report all safety, health and environmental near hits and incidents to your supervisor.
- Stop any unsafe work, if you think that the work you are doing is unsafe and inform your Line Manager.
- Know what to do during emergencies.



Don'ts

- Do not start work you are not qualified or legally permitted to perform.
- Do not ignore a safety issue, however small it may seem.
- Do not turn a blind eye if safety controls are not in place, are not being followed or do not work.
- Do not ignore safety rules and standards.
- Do not ignore unsafe behaviors, acts or conditions.

Safety Resources:

DTCB SHE Policies
Group Pioneering Brilliant Safety Strategy

Who can I speak to?

Line Manager
Safety and Sustainability Development Section
SHE Representative



Environment

DTCB has taken a decision to elevate sustainability by enhancing the site's eco friendliness, thus we seek to reduce our carbon footprint by incorporating lifecycle planning into our business processes.

To this end, DTCB supports the sustainable utilisation of resources and intends to be a Green Operation in the near future. We will continuously measure and monitor our key sustainability focus areas to improve our environmental stewardship. We intend to use our brand as a prominent vehicle to drive social and environmental change.



Do's

- Consider how your work can contribute to preventing harm to the environment.
- Use resources sparingly and use renewables where possible.
- Reduce waste generated from processes.



Don'ts

- Do not ignore a potential or actual environmental incident.
- Do not undertake work without the necessary environmental evaluations and compliance.
- Do not dispose of waste inappropriately.

SHE Resources:

DTCB SHE Policies
Group Pioneering Brilliant Safety Strategy

Who can I speak to?

SHE Coordinator or Line Manager
Safety and Sustainability Development Section
SHE Representative
DTCB Technical Services



PRIORITISING OUR EMPLOYEES IS OF UTMOST IMPORTANCE

Our people are the core of what we do. We believe that our employees' contributions and hard work are fundamental to the success of our organisation. We are proud of the quality of service they bring to the organisation and the spirit of teamwork they exhibit.



Employee Health and Wellness

Our organisation has a Health and Wellness strategy that presents the vision for the improvement of health status and health care of its population. The strategy has identified four priority areas (health promotion, occupational health, primary health care services and employee assistance programme). The aim of the strategy is to ensure that the health services that are being delivered will provide the greatest benefits in order to achieve health for all.

Health Promotion

Our Health Promotion Programme is driven by several key activities that seek to promote the adoption and maintenance of positive behavior change and healthy lifestyles. As an organisation, we have also taken deliberate action to curb non-communicable diseases through provision of services such as the weight management programme, implementing dietary management guidelines, promotion of physical activity, public health awareness and discouraging behaviors that may fuel onset of such diseases (i.e. diabetes, hypertension, heart related diseases, etc.) The health promotion programme also advocates for the delivery of the Company HIV Strategy by driving key objectives adopted by the World Health Organisation. Our HIV programme is managed as part of the health promotion and it includes early screening and identification of HIV, ensuring employees have access to HIV medication and medication adherence counseling.

Occupational Health

Our Occupational Health Programme deals with the prevention and management of work-related illnesses and injuries. The occupational health services procedure has outlined guidelines to be followed in order to implement the occupational health programme. Key areas of intervention include the fitness for duty evaluation, medical surveillance programme, management of injury on duty, rehabilitation and return to work management and disability evaluation and compensation.

Primary Health Care Services

There is an onsite clinic that is responsible for providing preventative and curative services. The clinic staff also raise awareness through various health education topics including on communicable diseases such as Tuberculosis, adhering to treatment Health care guidelines and continuous improvement in implementing quality health care. The clinic also adheres to a clinical waste management programme.





Do's

- Comply with occupational health service procedure.
- Take personal responsibility for your own health by wearing the necessary Personal Protective Equipment (PPE) and adhering to mandated work processes.
- Take appropriate preventative measures for any infectious diseases prevalent in the area(s) where you are working.
- Proactively identify health risks and report these to your Line Manager.
- Ensure that the correct controls are in place when undertaking daily tasks.



Don'ts

- Do not discriminate against any form of illness.
- Do not fail to adhere to mandatory PPE requirements.
- Do not ignore a failure in controls: take responsibility for reporting them and preventing harm.
- Do not engage in drug abuse, unsafe and unhealthy practices.
- Do not engage in alcohol/ drug abuse, unsafe and unhealthy practices as this may impair the ability to execute your duties safely and efficiently.

Health and Wellness Resources:

Occupational Health Service Procedure
Health and Wellness Policy
DTCB Site Rules

Who can I speak to?

Line Manager
Occupational Health Representative
Employee Assistance Programme Coordinator
Employee Health and Wellness Manager

Labor and Human Rights

We value our employees' input and are building a culture that encourages openness and diverse views. Our employees have a right to question, add value and engage in meaningful discussions through different forums without fear or favor. All these are enshrined in our values, policies and procedures. Our employees are encouraged to speak up against any form of intimidation, discrimination, bullying or anything that infringes their rights.

Our organisation recognises and respects the right to Unionise, wherein employees come together as a powerful, collective voice to communicate with management about their working terms and conditions. This allows the fostering of a strong relationship between management and employee representatives. We recognise that the Bargaining Unit is protected by statutes such as the Trade Disputes Act. Our stakeholders are equally protected and our dealings with them are above reproach.



Gender Based Violence

DTCB is committed to fostering an environment of respect, equality and safety for all employees. Gender-based violence (GBV) in any form whether physical, sexual, psychological or economic undermines the fundamental rights and dignity of employees and is unequivocally condemned under any circumstances by our organisation.

Our Commitment:

- **Zero Tolerance:** We maintain a zero-tolerance policy towards GBV in our workplace and in any activities associated with our organisation. This includes harassment, intimidation and any other forms of violence or discrimination based on gender.
- **Support and Resources:** We are dedicated to providing support to survivors of GBV. This includes offering access to counseling services and safe reporting mechanisms.
- **Awareness and Education:** We will continuously educate our staff, partners and stakeholders on the issues surrounding GBV. Regular training sessions and awareness programs will be conducted to ensure everyone understands the implications of GBV and how to combat it.
- **Policy and Enforcement:** Our organisation has established clear policies and procedures to prevent and address GBV. These policies will be strictly enforced and any reported incidents will be thoroughly investigated and dealt with promptly.
- **Collaboration and Advocacy:** We will collaborate with other organisations, communities and governments to advocate for stronger laws and policies against GBV. Our aim is to contribute to the broader societal effort to eradicate GBV.

Labor and Human Rights Resources:

Conditions of Service
Business Ethics Policy
Collective Labor Agreement





Rights and Obligations of Employees

In terms of the Code, all employees have the following rights and obligations:

- To be well informed regarding ethical conduct and sensitised on DTCB's standards of ethical business conduct.
- To be provided with information (suitable to their job grade) about the details of the procedures and policies affecting their work and to understand and follow them.
- To be aware of and alertness to situations that could encourage or allow participation in illegal, improper, or unethical actions and to seek guidance to avoid potential problems.
- To consider whether the actions of others may be unethical and to report conduct which is, or appears to be, in conflict with the Code.
- Not to accept or offer substantial business courtesies or gifts, either in cash or in kind, in connection with their employment.
- To manage their personal affairs in a manner which does not impair, or appear to impair, the objectivity of any decisions that they make on behalf of the Company.
- To discourage and resist nepotism or favouritism in the workplace.
- To recuse themselves from any official action or decision-making process which may result in personal gain.
- Not to tolerate any form of improper influence, bribery or unethical conduct by suppliers or any other stakeholders and to immediately report such conduct.
- To refrain from undertaking remunerative work without permission outside their official duties which may present conflict of interest with DTCB or using office equipment for any non-company remunerative work.
- To recognise that assets of the Company, including time, materials, equipment and information, are for the sole use of the Company and are not for personal benefit or use, after working hours.
- To perform duties with honesty and integrity and to the best of one's ability.
- To take responsibility and accept accountability for actions and decisions taken (appropriate to their job grade).
- To address any misconceptions or misunderstandings in the workplace, however they arise.
- To actively discourage any form of victimisation, discrimination, or retribution against those who report, have reported, or intend to report breaches of the Code.
- To communicate openly and honestly and act with a commitment to achieve a prudent, fair, transparent and responsible result.
- To preserve the assets, resources and reputation of DTCB and to report any event that may prejudice the Company.
- To honour the confidentiality of all matters, documents and discussions regarding the Company and not use or disclose any official information for personal gain or the gain of others.
- To keep abreast of technical and functional developments and to avail themselves of ongoing training and self-development.
- To participate fully and contribute to the improvement of team spirit.

Obligations of Management

In addition to their rights and responsibilities as employees of the Company, managers have additional responsibilities arising from their seniority and the nature of their managerial and/or supervisory duties, which include:

- To strive to reduce inefficiencies in DTCB and establish standards of efficiency in consultation with other employees of the organisation.
- To introduce and maintain an awareness in the Company by all employees that the resources of the organisation, including time resources, are in limited supply and should not be abused.
- To market the services of DTCB accurately.
- To determine minimum quality standards for the services of the Company and ensure that the services conform to these standards.
- To provide stakeholders with the ready means of lodging complaints about the quality of DTCB's services.
- To furnish to an auditor of DTCB all information and explanations which the Auditors require for the performance of their functions.
- To make a personal commitment to act in accordance with our standards of ethical business conduct, communicating this to subordinates and leading by example.
- To establish a working environment that encourages open communication regarding business ethics issues and concerns.
- To discuss business ethics issues periodically and reviewing standard of conduct during working hours e.g., at team briefings and forums.
- To ensure that appropriate ethics sensitisation and training is provided.
- To become familiar with the resources and processes available to assist in the resolution of questions and concerns about business ethics.
- To be alert to areas of business risk and establishing ways to address potential contraventions of the Code.
- To take responsibility for the conduct of employees to ensure that any misconduct, so serious, recurrent, or widespread that action should already have been taken to prevent it, is dealt with speedily and appropriately.
- To ensure that the Code and its contents, is communicated clearly and distributed to all employees. The Code should be included in the sign-on documentation for new employees.
- To consider whether subordinates are unaware of or have demonstrated insensitivity to the requirements of the Code when delegating discretionary authority.

Who can I speak to?

Line Manager
Head of Department
Employee Relations Manager
Senior Manager Human Resources



Do's

- Adhere to policies, procedures and guidelines.
- Adhere to the DTCB Conditions of Service.



Don'ts

- Do not intimidate, harass, bully, or abuse other employees or stakeholders.



Community Relations

DTC Botswana is committed to effective stakeholder partnerships and contributing to the sustainable development of Botswana. It ensures that its activities minimise, avoid or prevent adverse social impacts and create an environment where stakeholders directly or indirectly affected by its activities can prosper sustainably.

To deliver sustainable socio-economic benefits to communities, DTC Botswana leverages on Corporate Social Investment activities, guided by the company Code of Conduct, Business Ethics and Social Performance Framework. The Social Performance Framework applies to all DTCB employees, contractors and suppliers and accountability for its implementation is multi-disciplinary and cross-functional. Social Performance, Risk, Safety, Health and Environment, Security, Human Resources, Legal and Supply Chain are accountable for implementing aspects of the framework.



Do's

- Follow DTC Botswana's Social Performance terms of reference in identifying Social Performance initiatives.
- Be respectful, open and transparent in all engagements with communities.
- Actively participate in community development programmes.
- Seek advice from the Corporate Affairs and Social Performance section before engaging in Social Performance initiatives.
- Report and investigate stakeholder grievances and other incidents with social consequences.



Don'ts

- Do not make commitments without obtaining approval from relevant authorities/stakeholders.
- Do not engage in initiatives which impact only a small number of people.
- Do not work with unregistered organisations.
- Do not make any donations to political parties or lend any other support.

Community Relations Resources:

SusCom - Terms of Reference

Who can I speak to?

Corporate Affairs Section



Gender Diversity, Inclusion and Fair Treatment

We recognise there is strength in our diversity and create a conducive environment for all employees to feel included to unleash the full potential of our diverse talent. We uphold the highest standards of work ethics. We encourage our employees to acknowledge and embrace unique contributions that we each bring to our organisation (diversity unleashes creativity and innovation). The growth of our organisation is intertwined with the growth of our employees hence opportunities for individual growth are created. We believe in equal opportunities and we ensure that this extends beyond our employees to all the stakeholders that we do business with. We are an employer of choice as we provide a place to grow, build a career that is merit based and free of any bias or victimisation.



Do's

- Report any form of discrimination against self or any person doing business with us.



Don'ts

- Never discriminate others based on their beliefs, religion, place of origin, gender, age or any different attribute that they possess.

Diversity and Inclusion Resources:

Conditions of Service
Business Ethics Policy
Whistle Blowing Policy
Business Integrity Policy

Who can I speak to?

Line Manager
Employee Relations Manager



Harassment And Bullying

Our organisation is against any form of harassment or bullying whether in the workplace or during the course of conducting business with stakeholders. Employees have platforms to speak up when they feel violated or they witness any form of harassment to their person, fellow employees or stakeholders.



Do's

- Report any form of harassment against self or any person doing business with us.



Don'ts

- Do not harass and/or bully others.

Bullying and Harassment Resources:

Sexual Harassment Policy
Business Integrity Policy
Whistle Blowing Policy
Conditions of Service

Who can I speak to?

Line Manager
Employee Relations Manager
Sexual Harassment Advisors



Personal Information & Privacy

We take measures to prevent any personal data breach. DTCB is obliged to record and maintain legally required personal data for the purposes of payroll, retirement and medical benefits. Such information must be treated as confidential and used only for the legitimate purposes of the Company. The disclosure of any employee information (including personal addresses and contact details) to unauthorised persons is a dismissible offence.



Do's

- Process personal data only where we have a lawful reason to do so



Don'ts

- Do not access personal data unless you have the appropriate authorisation.

Our Business shall be conducted in an open, ethical and trustworthy way.



ACTING WITH INTEGRITY

We will cultivate a culture of accountability, ethical, impartial, selflessness, trustworthiness and high integrity.

We will strive to be a highly confident and accountable company and we will ensure that our actions are beyond reproach.

Bribery

Bribery is an improper activity which may relate to DTCB's business (including the activity of employees or third parties working on behalf of DTCB) or with the functions of government or other public bodies.

Our organisation has Zero tolerance for bribery. This includes but not limited to direct or indirect offering, promising, giving, accepting or soliciting of a financial or other advantage that result in an activity being performed improperly (for example, in breach of trust, in bad faith or in a biased manner).

Political Donations

DTCB does not participate directly or indirectly in party politics and does not make payments to political parties, politicians or related organisations. In addition, DTCB does not make donations for political purposes to any politician, political party or related organisation, official of political party candidates for political office under any circumstances either directly or through third parties.



- Report any bribery or bribery related activities or any attempt to influence you improperly.
- Report any improper influence that is witnessed

Do's



- Do not offer or accept bribes or any improper payments (e.g., via a customer, agent, intermediary or supplier).

Don'ts

Political Donations Resources:

Business Integrity Policy
Whistle Blowing Policy
Conditions of Service

Who can I speak to?

Line Manager
Risk, Insurance and Compliance Manager
Tip Off Anonymous Hotline

Gifts, Entertainment and Hospitality

Our Gifts, Entertainment and Hospitality guideline prevents the payment or receipt of inappropriate gifts, entertainment and expenses and reduces the risk of potentially legitimate gifts, entertainment and expenses being construed as being corrupt or improper.

We recognise that fostering good relationships with business partners is important to our continued success. The provision and receipt of modest corporate gifts and entertainment as well as the incurring of expenses, is acceptable in principle.

Individuals may only offer or accept corporate or personal gifts of modest value. In all circumstances, gifts, entertainment and expenditure must be subject to the disclosure process and proposed expenditure. The exceeded specified value is subject to prior approval of the Compliance Committee.



Do's

- Disclose and register receipt of the gifts and entertainment (each and every instance recorded and, where relevant, authorised).



Don'ts

- Do not accept any gifts that creates (or may create) any sense of obligation.
- Do not accept illegal gifts, entertainment and other expenses.

Gifts, Entertainment and Hospitality Resources:

Business Integrity Policy
Gifts, Entertainment and Hospitality Policy

Who can I speak to?

Line Manager
Chief Financial Officer (CFO)
Risk, Insurance and Compliance Manager

Conflict of Interest

In our business conduct, we must not abuse our positions, misuse confidential knowledge for personal or third-party gain. Furthermore, we must not have any direct involvement in any business interest which diverts our attention from or is against our commercial interest or in any way compromises our independence and impartiality.

- We should not have an undisclosed direct or indirect interest in any company or undertaking which our organisation proposes to deal with.
- Disclose and discuss any possible conflict of interest.

Approval from management at an appropriate level is required before doing any of the following:

- Holding a passive investment interest (either directly or indirectly) in any supplier or customer.
- Acting as an officer, director, partner, consultant, representative, agent, adviser or employee of a (potential) supplier, customer, or competitor of the Company.
- Being involved in any capacity in the conduct of any business that is involved in technical areas or product lines that are like those of DTCB should the involvement be for personal gain and enrichment, or
- Being involved in any capacity in the conduct of any business whose customers include the Company, its customers or its suppliers, should this involvement be beyond the primary functions and responsibility of DTCB and result in personal benefit.

DTCB encourages employees to participate in non-profit industrial, professional, civic, or charitable activities and these are generally not viewed as constituting a conflict of interest.

The employee is responsible for declaring the possibility of a conflict of interest.





Do's

- Disclose any conflict and potential conflict of interest as early as possible.
- Raise any suspected conflict of interest.



Don'ts

- Do not make assumptions of conflict of interest.
- Do not hide any actual or possible conflict of interest.

Conflict of Resources:

Business Integrity Policy
Gifts, Entertainment and Hospitality Policy

Who can I speak to?

Line Manager
Chief Financial Officer (CFO)
Any Security Official
Human Resources (HR)
Risk, Insurance and Compliance Manager



Suppliers, Customers and Other Business Partners

Our dealings with customers, suppliers and other business partners are strongly hinged on the values of fairness, accountability and transparency. We follow supply chain policy and procedures to avoid any undue influence in interactions with our business partners. We conduct a thorough due diligence on our suppliers and business partners before dealing with them. This is done to ensure that they are legitimate and compliant with legislation such as Financial Intelligence Act (FIA), principles of safety, human rights and integrity.

We uphold fair business standards and competition to avoid damage to our financial status and image by actions of our suppliers, contractors and business partners.

All our suppliers, customers and business partners must conduct their activities professionally. They must not perform any act which would undermine DTCB's commitment to conduct business in accordance with its policies, procedures, best practice, the Code of Conduct and laws of Botswana.



Do's

- Treat business partner information with strict confidentiality.
- Ensure that supply chain is engaged at initial stage of procurement.
- Declare your interest that could compromise your impartiality in decision making.
- Ensure that all new suppliers are vetted to minimise supply risk.
- Strictly adhere to the DTCB site rules.
- Be fair and transparent in the selection of business partners.



Don'ts

- Do not solicit goods or services from suppliers without following supply chain policies and procedures.
- Do not act in a manner that will compromise your integrity when dealing with suppliers and business partners.
- Do not create any legitimate expectations on the part of the suppliers and business partners.
- Do not use your authority, position and inside information for financial gain.
- Do not unduly influence any contract award decision.

Suppliers Resources:?

Procurement Policy
Procurement Procedures
Contract Management Procedure
Security Policy

Fair Competition

Our organisation subscribes to a free-market economy where the consumer is the ultimate beneficiary. In this economy consumers have the option to switch product or service providers freely and easily. Hence the reason why we strive to ensure that the pool of service providers we choose from maintain a competitive edge, to guarantee that DTC Botswana as a customer, receives the utmost benefits such as superior quality, cutting-edge innovations, affordable prices, readily available and up-to-date information and unparalleled customer service and experience.

DTCB expects its employees to always ensure that, they don't take part in anti-competitive practices. In the same token, our organisation will also conduct business in compliance with applicable competition laws.





Do's

- Familiarise yourself with applicable competition laws, to make compliance easy.
- Contact the Line Manager
- Contact the Risk, Insurance and Compliance Section if in doubt.



Don'ts

- Do not agree to participate in any activity which promotes anti-competition, for example price fixing and fraudulent collusions with suppliers.
- Do not disclose or leak unpublished information for the business.

Anti-Money Laundering (AML), Countering the Financing of Terrorism (CFT), and Combating Proliferation Financing (CPF)

Our company is committed to maintaining the highest standards of integrity and ethical conduct. This section outlines our policies and procedures to combat money laundering, the financing of terrorism, and the proliferation of weapons of mass destruction (WMD).



1. Combating Anti-Money Laundering (AML):

- Conduct thorough due diligence on all clients and transactions.
- Report any suspicious activities to the designated AML Compliance Officer.
- Maintain accurate records of all transactions and client information.
- Participate in regular AML training sessions.

2. Combating Anti-Money Laundering (AML):

- Screen clients and transactions against relevant sanctions lists to identify potential risks.
- Report any transactions or activities that may be linked to terrorism to the designated CFT Compliance Officer.
- Ensure that all financial transactions are transparent and traceable to prevent misuse.
- Engage in ongoing CFT training and awareness programs to enhance vigilance and compliance.

Combating Proliferation Financing (CPF):

- Identify and report any transactions that may be related to the proliferation of weapons of mass destruction (WMDs).
- Conduct enhanced due diligence on high-risk clients and transactions to mitigate potential threats.
- Cooperate fully with regulatory and law enforcement authorities in investigations related to proliferation financing.
- Participate in CPF-specific training and education programs to stay informed about emerging risks and regulatory requirements.

Beyond WMDs: Other Hazardous Chemicals

While WMDs are a significant concern, other chemicals also pose serious risks due to their potential for misuse or accidental release. These chemicals, although not classified as WMDs, can still have severe consequences for example, Industrial Chemicals: Substances like chlorine and ammonia are widely used in industry but can be deadly if released in large quantities. Chlorine gas, for example, was used as a weapon during World War I.



Do's

- Ensure completeness, due diligence and adequate background check for new business partners.
- Raise concerns if you see something that may look like money laundering.
- Ensure that Know Your Customer (KYC) is carried out regularly on all business partners.
- Immediately report any suspicious transactions to the Risk, Insurance and Compliance Manager.



Don'ts

- Take part in or conceal money laundering and terrorism activities.
- Fail to report suspected money laundering.

Who can I speak to?

Chief Financial Officer (CFO)

Risk, Insurance and Compliance Manager



PROTECTION OF OUR ASSETS

Security Services

Mandate/Mission of the Security Services Department

Our mandate is to provide a foundation for DTCB to proactively manage security related threats and risks to ensure the security of employees, business partners, information, reputation, facilities and products without unnecessarily encumbering operations' processing efficiency.

Principles Guiding the Security Services Department

- Upholding human rights and all legal requirements.
- Risk based approach to all security and other related activities.
- Balance between Security Risk Management and integration with Operations and other business areas (where appropriate).
- Outsourcing to be considered only if material advantage is evident.

Objectives of the Security Services Department

- Proactively identify, assess and minimise the level of security threat and risk to DTCB, its employees, business partners, information, reputation, facilities and product.
- Protect DTCB, its employees, business partners, information, reputation, facilities and product within the diamond pipeline.
- Create a conducive environment that assures the upholding of human rights, legal, regulatory and all other statutory requirements.
- Provide assurance to De Beers Global Sightholder Sales and all other internal and external entities through implementation of best practices in governance, risk and compliance.

Adoption Of International Standards

DTCB Security Services Department adopted international standards as initiatives; ISO 31000 in 2017 which focuses on Risk Management and in 2021 DTCB was certified by ISO following the implantation of Security Operations Management System: ISO 18788:2015 (SOMS).

Benefits of SOMS

- International management system for private security operations.
- Provides business and risk management framework for the effective conduct of security operations.
- Clear policies and procedures.
- Imposes a duty to respect, uphold and protect human rights.
- Continuous measurements, monitoring and tests of operational controls for effectiveness.

The DTCB security performance is reviewed annually through a process that measures compliance to standards and effectiveness of implemented security strategies and methods.

Security Services Resources:

Security Policy

Security Services Mandate and Deliverables

Who can I speak to?

Senior Manager - Security Services

Security Section



Do's

- Always be in possession of your security permit to produce it upon demand by a DTCB Security official. A digital permit is an alternate to a physical permit.
- Make security your responsibility.
- Read procedures for awareness and compliance.



Don'ts

- Do not carry any diamond like material
- Do not carry offensive weapons
- No unauthorised photography

Information Security

Our company is required to ensure that the company's information assets are protected. Information security is everyone's responsibility to ensure that our information assets are protected from cyber-security threats. DTCB management is committed to the protection of our information assets and the need for effective Information Security Management. Information security serves to:

- Ensure compliance with legal, regulatory, ethical and contractual requirements especially with regards to information that is classified as highly restricted, confidential, departmental and internal.
- Ensure that information assets are protected from loss or misuse.
- Promote a culture of secure working practices.
- Protect personal data under applicable data protection legislation.

All the departments are requested to ensure that employees, contractors and third parties are made aware of their responsibilities as stipulated in the information security policies, standards, procedures and guidelines.

Information Security Resources:

Information Security Policy
Information Security Procedure
Information Technology User Policy
Information Technology Management Policy
Clean Desk Policy
Data Protection Act 2018 and any applicable privacy legislation

Who can I speak to?

Information guardians
Line Manager
Head of Department
IM (Information Management) Service Desk
IM Governance and Information Security Manager
IM Manager
Any Security Official





Do's

- Ensure adherence to information security policies, standards, procedures and guidelines.
- Always ensure that information that is classified as highly confidential, confidential or official is handled in line with IM policy stipulations.
- Immediately report loss or damage of any hardware and/or software to IM and your Line Manager.
- Ensure that personal and sensitive personal data is kept safe and is collected with the consent of the data subject.
- Ensure that personal and sensitive personal data is handled in accordance with the requirements of the Data Protection Act of 2018 and any applicable privacy regulations.
- On leaving the office, at the end of the day or for any significant period during the day, ensure that desks are kept clean and sensitive documents are locked away in cabinets.
- Access information systems by means of authorised user account and password.
- Keep company assets safe and always secured e.g., laptops in a locked vehicle boot, confidential documents in locked cabinets.



Don'ts

- Share or communicate your systems password.
- Use computers in internet cafes, hotel centers or similar public facilities to access the DTCB company network.
- Install and use any unlicensed software on any company computer.
- Store information that is classified as highly confidential, confidential or official on mobile devices and removable media including laptops, smart phones, iPads and memory sticks, wherever possible.
- Use unauthorised equipment to access company network.
- Open any attachments, links from unknown senders, or if they look suspicious.



Asset Care and Use

DTCB relies on its physical assets to deliver diamond sorting and valuing services to all its stakeholders' expectations. It is therefore imperative that the DTCB Code of Conduct supports the asset care mandate as stipulated in the Asset Management Policy. This code of conduct outlines the behaviors and practices expected of all employees in order to ensure sustainable and efficient use of the company's physical assets.

Asset Care and Use Resources:

Asset Management Policy

FIIX – For Fault Reporting

Who can I speak to?

Section Engineer - Asset Management Engineer



Do's

- Report any unsafe condition associated with any physical asset.
- Report misuse or abuse of physical assets.
- Keep company assets in safe and good condition.



Don'ts

- Do not use any company asset (or part thereof) for any purpose other than the one for which it was originally intended.
- Do not use any company assets for personal purposes.
- Do not remove any asset (or part thereof), movable or fixed, from its designated location without permission from the asset custodian.
- Do not temper with the physical makeup or structure of any asset.
- Do not use any asset that is not in a usable condition to avoid damage to the asset or personal injury.
- Do not operate any piece of equipment or machinery unless you're trained to do so.
- Do not attempt to repair or fix any faulty piece of equipment or machinery unless you're trained to do so.



Communicating Externally

Diamond Trading Company Botswana (DTCB) recognises the important role that the media plays in shaping perceptions of various stakeholders about its reputation. Positive media and stakeholder relations create an engagement environment which builds trust and transparency.

Our communication, both written and verbal, should be clear, accurate, consistent and responsible. It must also comply with laws and regulations. For this reason, only those who have been authorised to do so in advance should talk to the media and make disclosures.

Any employee using social media who chooses to mention anything in connection with DTCB should remember that they are an ambassador for the company and should therefore strive to protect the reputation of DTCB by communicating in line with its values. Should anyone wish to comment in their personal capacity on issues directly relevant to DTCB, they should always use their real name, be transparent about their affiliation to DTCB and make it clear that their opinions are their own and are not made on behalf of DTCB.

The consistency of DTCB's messages to the media and other stakeholders is critical to the continued strength of the company's local, regional and international reputation to ensure a positive impact on the Company's brand equity.



Do's

- Consult early with Corporate Affairs before making any communication that could affect DTCB.
- Provide advance notice to Corporate Affairs of activity likely to cause media and other external stakeholder interest.
- Deliver precise, compelling and progressive communication to key stakeholders.
- Create a climate of openness and transparency with key stakeholders.



Don'ts

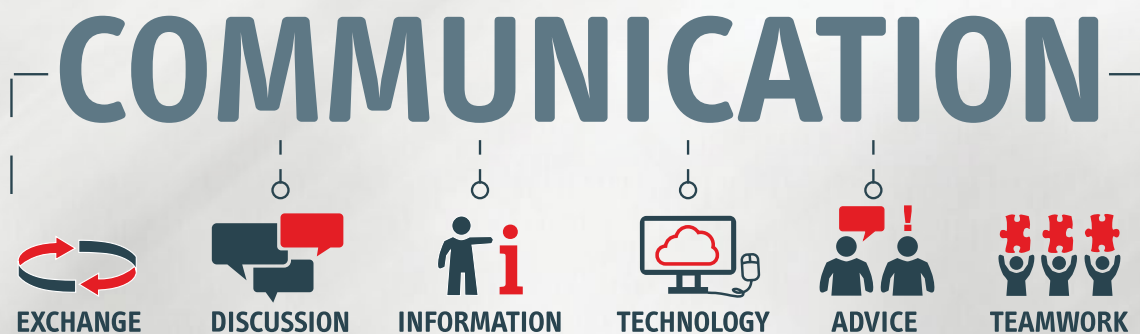
- Do not speak to the media without first consulting with the Corporate Affairs team.
- Do not publicise personal grievances through social media.
- Do not disclose via external communications DTCB'S commercially sensitive information without prior legal approval.

Communicating Externally Resources:

Media Policy

Who can I speak to?

Corporate Affairs



Intellectual Property

Intellectual Property (“IP”) seeks to manage and avoid the commercial exploitation of DTCB’s IP owned by other (“Third Party IP”). IP in the context of diamond mining includes technologies and processes created to extract and sort rough diamonds.

The IP legal protection is provided by legal rights, which are known as Intellectual Property Rights (“IPR”). The DTCB IP applies to all forms of legally recognised IP that are created or devised in the course of employment of DTCB staff and applies to any other IPR assigned to or owned by DTCB or to which DTCB is entitled, (except to the extent DTCB has agreed otherwise). All intellectual property rights created, designed or made during the course of any employee’s work belong to DTCB.



Do's

- Use third parties’ intellectual property with proper diligence and care.
- Any misuse and suspected misuse of DTCB or third party’s IP should be reported.
- Familiarise yourselves with copyright laws.



Don'ts

- Do not violate copyrights (e.g., software and any written material etc.)
- Do not download and/or use unauthorised software, audios, written material etc.
- Do not use any information generated within DTCB for personal gain.

Intellectual Property Resources:

Information Security Policy

Information Security Procedure

Companies and Intellectual Property Authority Act, 2011

Who can I speak to?

Risk, Insurance and Compliance Manager

Line Manager

Safe to Speak Up

We encourage employees and relevant people to report any unethical behavior or activities. Employees/whistleblowers are assured that:

- The information passed on will be treated as confidential and fully investigated.
- Their identity will be secured and protected.
- The information must be disclosed in good faith without malice and not for personal gain.



Whistleblowing

Our Ethics Hotline (0800 700 706) which is managed by an external independent service provider shall be appointed by the response team through the DTCB supply chain policy and shall operate a 24-hour service and reporting can be done anytime and any day of the week including public holidays. The Response Team will ensure that the confidentiality and all that is reported will be investigated. The written and oral evidence provided will be scrutinised for any signs of third-party interference during the investigation.

The role of the independent service provider will be to:

- Receive and record as much information as possible relating to the subject matter of the disclosure.
- Generate reports in the prescribed format on all disclosures over the relevant period.
- Forward the disclosures simultaneously to the members of the Response Team.



Do's

- Disclose any information regarding alleged unlawful or irregular conduct by the organisation.
- Disclose any information regarding alleged unlawful or irregular conduct of its employees or relevant persons doing business with the organisation.
- Disclose any information regarding alleged unlawful or irregular conduct through the whistleblowing hotline or any other available channels.



Don'ts

- Do not use the whistleblowing hotline for personal vendetta.

What Should I do if I am Unsure About Anything?

Always exercise professional skepticism, engage, consult and enquire where need be. Ask your Line Manager, seek clarity from the relevant authority.

Do not assume.



DTC Botswana



Put Safety first



DTC Botswana

Pride and prosperity through diamonds



@DTCBotswana

www.dtcbotswana.com