

# GEMFIELDS

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## Product Integrity & Stewardship Policy

We commit to:

- Driving standards and supporting and implementing any procedures and processes agreed together by the coloured gemstone sector, government and civil society representatives aimed at furthering the professionalisation, transparency and traceability of coloured gemstones
- Distinctly and separately label the source of both rough gemstones produced by our mining operations and traded gemstones and ensure that all necessary or required certifications, warranties, audits and laboratory reports accompany the sale of those gemstones
- Disclosing the characteristics and any treatments of rough gemstones produced by our mining operations to auction participants and ensure that we do not willingly mislead through false marketing or communication of our product
- Never alter rough gemstones produced by our mining operations with the excessive use of common industry treatments, auctioning treated rough stones with full disclosure and never knowingly trading in gemstones that are treated without our knowledge or that are falsely labelled or disclosed to us by the seller
- Working with auction participants to raise awareness of our policies and standards and aim to trade in finished gemstones with companies that agree with our policies and share the same values and aspirations around product stewardship
- Conducting third party spot-check audits to ensure that direct suppliers of cut and polished stones are adhering to our policies and standards
- Reserve the right to suspend any supplier suspected or found to be in breach of our policies, especially where deliberate falsification or miss-selling is concerned
- Never knowingly trading in gemstones that have originated from sources involved in conflict, human rights abuses, fraud, money laundering or the funding of terrorism, and ensure that our sales or purchase documentation disclose this commitment by us and in signed agreement with a seller
- Suspend any supplier suspected of being involved in the trade of coloured gemstones linked directly to conflict, human rights abuses, fraud, money laundering or the funding of terrorism until we have received assurances that no such activities are taking place, or that if such activities were taking place without the suppliers' knowledge that a commitment has been made to implement systematic improvements
- Proactively understand the site-specific dynamics of illicit and unlicensed mining on our concessions in order to minimise commercial risk



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Ian Harebottle  
CEO



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Clive Newall  
Chair, HSEC Committee