

ANTI-MONEY LAUNDERING AND COMBATING TERRORIST FINANCING

De Beers Canada* acknowledges its responsibility to prevent money laundering and combat the financing of terrorism. De Beers is committed to complying with guidelines and legislative bodies and to providing full cooperation with authorities related to the prevention of money laundering and combating the financing of terrorism through compliance with all applicable legislation.

Accordingly, De Beers Canada will:

- Develop and maintain guidelines and procedures to become an industry leader in the development, implementation and disclosure of anti money laundering and terrorist financing activities;
- Regularly review and continually improve its guidelines and procedures against money laundering and terrorist financing activities;
- Ensure that all employees who are required to work with money and financial instruments or are employed within the procurement or new mining business development spheres are adequately trained and are aware of the steps to be taken to detect and deter money laundering and terrorist financing activities;
- Implement additional steps including implementation of procedures for detecting and reporting suspicious transactions, appointing compliance officers, and training all employees involved in diamond trading and related activities with respect to the implementation of policy and all related procedures;
- Work in cooperation with all authorities and regulatory bodies as required in preventing and combating money laundering and terrorist financing activities;
- Ensuring that all employees have been made aware of and have been appropriately trained with regards to their responsibilities, and De Beers Canada shall maintain records of their acceptance of such responsibilities; and
- Encourage appropriate steps including whistle blowing where suspicious activities are suspected.

** The term De Beers Canada means De Beers Canada Inc., and includes the Corporate, Exploration and Mining Divisions.*