



LUCARA
DIAMOND

Human Rights Policy

Our Code of Business Conduct and Ethics states that the “Company respects each individual's human rights and shall seek to foster respect and equality for all. Individuals shall not be discriminated against on the basis of factors unrelated to their ability to perform their job.”

Our Commitment

We are committed to meeting our responsibility to respect human rights and labour standards as defined by the UN Guiding Principles on Business and Human Rights. Our commitment is based on the Kimberley Process, the Code of Practices (2019) of the Responsible Jewellery Council, and other relevant standards. We actively participate in the United Nations Global Compact and have adopted several Sustainable Development Goals.

Our principle is that where national law and international human rights standards differ, we will follow the higher standard; where they are in conflict, we will adhere to national law, while seeking ways to respect international human rights to the greatest extent possible.

This policy applies to Lucara Diamond Corp. and all our subsidiaries. Contractors and suppliers are required to uphold these principles.

Stakeholder Engagement

Our core values guide our engagement activities. We are committed to respecting and listening to our people, our communities, local governments, to delivering on our promises and commitments, and to communicating with openness, honesty and transparency.

We engage in the communities on a regular basis, meeting with the people, including indigenous peoples as well as other vulnerable and disadvantaged groups, allowing us to learn about expectations and concerns, be accountable about our operations and social investments, and identify opportunities for improvement.

Diversity and Inclusion

We believe that strength comes from diversity and are proud to be an equal opportunity employer. We are committed to building a culture of inclusivity where we welcome and recognize the unique contributions of each of our employees.

Freedom of Association and Collective Bargaining, Force and Child Labour

Throughout our business practices, we uphold the freedom of association, the elimination of forced or compulsory labour, the effective abolition of child labour, and the elimination of discrimination in respect of employment and occupation.

Safe and Healthy Workplace

Health and safety are among our core values, and part of our working culture. We are committed to creating a healthy and safe working environment for all employees, contractors and visitors, and to complying with applicable safety and health laws and regulations.

Workplace Security

We are committed to providing workplaces that are free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for employees are provided, as needed, and are maintained with respect for employee privacy and dignity.



Reporting

If any violation of this policy is observed, whether committed by Company employees or by others associated with the Company, it is to be reported to an immediate supervisor, or an officer of the Company, as appropriate. If it is determined that there is a violation, the employee, supervisor or officer, as applicable, shall advise the Chair of the Safety, Health, Environment & Community Relations (“SHECR”) Committee in writing.

To report a matter in a confidential or anonymous basis, an individual may:

- Test In confidence, send an email to the attention of the Chair of the SHECR Committee at: ethicscomplaint@lucaradiamond.com; or
- Anonymously, post the complaint or concern to the Attention of the Chair of the SHECR Committee, Lucara Diamond Corp., Suite 502, 1250 Homer Street, Vancouver, BC, Canada V6B 2Y5

Following the receipt of any reports submitted hereunder, the Chair of the SHECR Committee will investigate each matter so reported and report to the Board which will take corrective disciplinary actions, if appropriate, up to and including termination of employment.

There will be no reprisals against employees, officers and directors for good faith reporting of compliance concerns or violations.

Reports received by the Chair of the SHECR Committee will be retained for a period of seven years.

Public Reporting

We report to the public on our human rights-related commitments, efforts and statements, consistent with this Human Rights Policy, as part of our annual Sustainability Report.

Our Governance

This policy is overseen by Lucara Diamond Corp.’s Chief Executive Officer with support from the Executive team. This ensures that every part of our business is clear about the responsibility to respect human rights and to remedy any violations. Board-level oversight is provided by the SHECR Committee of Lucara Diamond Corp.

Approved by the Board of Directors of Lucara Diamond Corp. on February 22, 2021