



LUCARA  
DIAMOND

## Provenance Claim

A “provenance claim” is a documented claim, made using descriptions or symbols, that relates to gold, silver, PGM, diamonds or coloured gemstones that are offered for sale (whether as stand-alone materials or set in jewellery). Provenance claims are typically made about a product’s origin, verification of source, traceability of material, and certification of material or suppliers. *Source – [Responsible Jewellery Council](#).*

## Lucara’s Provenance Claim

Lucara Diamond Corp. sources 100% of its diamonds using modern conventional open pit mining methods. All of the Company’s sourced diamonds are natural, untreated, and originate from the Karowe Diamond Mine located in the Boteti District in Botswana. The mine is owned and operated by Lucara Botswana, Lucara’s indirect, wholly-owned subsidiary, which enables Lucara to guarantee the origin of all the diamonds it recovers and sells. Lucara sells responsibly and ethically mined diamonds and operates transparently and in accordance with international best practices, including the Responsible Jewellery Council’s Code of Practices (2019), the Kimberley Process, the IFC Performance Standards, the Equator Principles, and the World Bank Group’s Environmental, Health and Safety Guidelines for Mining (2007).

## The Importance of Providing Provenance

Concerned with ethical and environmental issues, consumers are increasingly asking about the source of diamonds, coloured gemstones, gold, and other precious metals. Audited provenance claims provide assurance to clients, customers and stakeholders that the claims made are valid, truthful and that the products are the result of ethical and environmentally responsible activities throughout the supply chain.

Lucara is a certified member of the Responsible Jewellery Council, and as such is subject to independent external audits, including the provenance claim. As noted in Provision 14, the Responsible Jewellery Council requires that members shall:

- Have systems to ensure that the provenance claims are truthful and substantiated by evidence.
- Do training to ensure that employees who are responsible for implementing the claims and responding to product enquiries, understand the claims and can explain them accurately.
- Make further information available to customers who ask about a provenance claim.
- Have a complaints or grievance mechanism appropriate to the nature, scale and impact of the business to allow interested parties to voice concerns.

## Grievance Mechanism

Lucara has developed a grievance mechanism that is appropriate to the nature, scale and impact of the business, to allow interested parties to voice concerns about the veracity of Lucara’s Provenance Claim.

Upon receiving a grievance, Lucara will ensure that all details are documented in the Grievance Log, review the grievance mechanism with the complainant, determine how the complainant would like to proceed and establish their desired outcome.

The grievance will be reviewed internally at the executive level to decide how it should be handled and by whom. A review of the grievance will seek all relevant information, identify if any actions are required,



**LUCARA**  
DIAMOND

and if so, what those actions are. Lucara's executive will report any provenance grievances received to Lucara's Board of Directors on a quarterly basis.

Once the grievance has been addressed and resolved, a member of the executive team will advise the complainant of any decisions or outcomes, and will seek satisfactory closure. This will be documented in the Grievance Log.

Concerns can be raised by concerned parties anonymously by sending an email to the Chair of the Audit Committee at [ethicscomplaint@lucaradiamond.com](mailto:ethicscomplaint@lucaradiamond.com), or by posting the complaint or concern to the Attention of the Chair of the Audit Committee, Lucara Diamond Corp., Suite 2800, Four Bentall Centre, 1055 Dunsmuir Street, PO Box 49225, Vancouver, B.C., Canada, V7X 1L2.