



ALROSA ALLIANCE

Guidelines on Responsible Business Practices

Third Edition

APPROVED

By the resolution of the
Executive Committee of

ALROSA PJSC

30 January 2020

(Resolution N° 01/285-ПР-П)



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ABOUT ALROSA ALLIANCE LOGO

The ALROSA ALLIANCE Logo is a set of combined word/graphical trade marks registered by PJSC ALROSA, as designated in the ALROSA ALLIANCE Accreditation Logo Usage Guidelines (hereinafter “the Brand book”).

These Guidelines on Responsible Business Practices form an integral part of the ALROSA ALLIANCE Logo license agreement open for signing by long-term buyers of rough diamonds produced by PJSC ALROSA to endorse their status of a reliable buyer of industrial and non-industrial rough diamonds and strengthen supplier-consumer confidence.

ALROSA ALLIANCE Logo licensees should satisfy the requirements for responsible business conduct contained herein.

Any failure to comply with these requirements for responsible business conduct will be regarded as a cause for terminating the ALROSA ALLIANCE Logo license agreement.

A long-term supply contract with PJSC ALROSA is not only a guarantee of consistent access to the source of high-quality rough diamonds produced and supplied in full compliance with the requirements of the Kimberley Process (KP), the System of Warranties of the World Diamond Council (WDC) and the Responsible Jewellery Council Code of Practices (RJC COP). As the mining sector’s largest public company, PJSC ALROSA pursues a very careful approach to selecting its long-term clientele. The ALROSA ALLIANCE Logo is the hallmark confirming that a PJSC ALROSA client is a reliable partner who honours their obligations.

Long-term clients of PJSC ALROSA may use the ALROSA ALLIANCE Logo in their business related to supplying rough diamonds, manufacturing polished diamonds and/or diamond jewellery to signal to their clients and suppliers adherence to high business ethics standards, expertise and experience that are integral elements of the PJSC ALROSA long-term client status.

Clients who may be entitled to use the ALROSA ALLIANCE Logo must meet the following criteria:

- Maintain best standards of business practice and corporate ethics;
- Show a high level of professionalism and production efficiency;
- Have the ability to add value to diamond products;
- Have a distribution network with a broad geographical exposure;
- Adhere to responsible trading practices on the diamond market;
- Satisfy the requirements and criteria set forth in the Regulations on the Procedure and Terms of Sales of Natural Rough Diamonds by PJSC ALROSA.

Any incompliance with the requirements for responsible business practices contained in these Guidelines may be deemed a ground for forfeiture of a right to use the ALROSA ALLIANCE Logo.

GENERAL PROVISIONS

To enhance the credibility of the ALROSA ALLIANCE Logo, and also as part of developing its corporate business standards and adherence to best practices in the diamond industry PJSC ALROSA has developed and adopted the ALROSA ALLIANCE Guidelines on Responsible Business Practices (hereinafter “the Guidelines”).

PJSC ALROSA seeks to create a sustainable future through maintaining a responsible balance between commercial and public interests. PJSC ALROSA is irrevocably committed to continuous development of the regions where its production facilities are located by creating jobs and improving living standards for local communities, generating tax revenues for budgets at different levels, building social infrastructure and protecting the environment, including contributing to the achievement of the UN Sustainable Development Goals.

Taking into account the need to represent the interests of the global diamond industry at large in the best possible manner, and with regard to the importance of building and strengthening end consumers’ confidence in diamonds, PJSC ALROSA attaches special attention to client selection, seeking to enter into commercial relationships only with clients who are capable of demonstrating proper legal compliance, ensuring financial sustainability, and meeting the highest business ethical and reputation standards.

These Guidelines are based on the experience of the implementation of the world’s best business practices, internationally-accepted corporate governance and industry-self regulation standards and key international instruments that stipulate financial transparency, respect of human rights, security, social and economic development, and protection of the environment. These Guidelines are based on key documents of the United Nations Organisation (UN), laws of the Russian Federation, and the best industry initiatives for implementing responsible business practices.

These Guidelines are meant to be used by PJSC ALROSA, Members and other diamond industry stakeholders as a guidance to ensure compliance with high business standards, corporate ethics and governance throughout the entire diamond supply chain.

By providing and using the ALROSA ALLIANCE Logo, the ALROSA ALLIANCE Members declare their adherence to the “ALROSA ALLIANCE Guidelines on Responsible Business Practices” and commitment to the implementation of these Guidelines in their business activities and in the process of interaction with their clients and partners from mine to retail.

PJSC ALROSA reserves the right to amend these Guidelines if need be.

TERMS AND DEFINITIONS

ALROSA ALLIANCE Guidelines on Responsible Business Practices (Guidelines)	a set of fundamental ideas and guiding principles underpinning business practices of ALROSA ALLIANCE Members
ALROSA ALLIANCE Logo	trademarks registered by PJSC ALROSA that are a combination of word and graphical signs, as described in the ALROSA ALLIANCE Accreditation Logo Usage Guidelines (Brand book); brings together clients who meet high ethical standards of business conduct, and have profound understanding of the diamond market, and indicates their status as a reliable buyer of the rough
ALROSA ALLIANCE Member (Member)	PJSC ALROSA and companies using the ALROSA ALLIANCE Logo under the license agreement that are PJSC ALROSA long-term clients who meet best business standards and have profound understanding of the diamond market
Applicable law	relevant international and/or national law applicable to a company using the ALROSA ALLIANCE Logo
Authorities	any central and local authorities, including legislative, executive (e.g., government departments, agencies and ministries) and judicial bodies of the government
Bribe	something valuable, such as any material recompense or property benefits, received by an official in return for any action or omission to act for the benefit of the giver that such an official could undertake or undertook to perform in his official capacity
Business activities relating to products not covered by the Guidelines	activities including, but not limited to, the creation, manufacturing, polishing, processing, and/or trading (sale and purchase) of products not covered by the Guidelines and/or jewellery incorporating products not covered by the Guidelines
Business partner	a legal entity established under applicable law that already has or is negotiating to have a contractual business relationship with an ALROSA ALLIANCE Member with regard to buying or selling diamonds and/or diamond jewellery
Charity activities	voluntary activities of an organization donating (i.e., giving free of charge or providing on preferential terms) assets, including money, carrying out work, providing services or other support to individuals or legal entities
Composite (assembled) stones	stones constructed of two or more parts

Composite diamond (diamond doublet)	stone in which all parts are composed of diamonds. Composite stone where some but not all the parts are diamonds shall be described by the words "doublet" (two parts) or "triplet" (three parts) or "composite" (two or more parts), and these words shall be immediately combined with the correct names of the components of the assembled product, the named of which shall be mentioned from the upper part downwards and (e.g. doublet whose upper portion is diamond and whose lower portion is synthetic diamond is called diamond/synthetic diamond doublet).
Conflict diamonds	rough diamonds used by rebel movements or their allies to finance conflict aimed at undermining legitimate governments, as described in relevant United Nations Security Council (UNSC) resolutions insofar as they remain in effect, or in other similar UNSC resolutions which may be adopted in the future, and as understood and recognized in the United Nations General Assembly (UNGA) Resolution 55/56, or in other similar UNGA resolutions which may be adopted in future
Corruption	any abuse of office, bribe-giving, bribe-taking, abuse of authority, commercial bribery or any illegal use by an officer or an employee of their official position in an organization contrary to legitimate interests of that organization with the purpose of reaping benefits in the form of money, valuables or other assets, or monetizable services, other property interests either for themselves or any third parties, or illegal provision of such benefits to the designated officer or an employee by other individuals, or committing such actions on behalf of or in the interests of a legal entity
Diamond	a precious stone of natural mineral origin consisting of carbon crystallized at cubic syngony, with a Mohs' scale hardness of 10, a specific gravity of +/- 3.52 g/cm ³ and a refractive index of 2.42; in nature diamonds come in an array of different colors
Diamond pipeline	diamond value chain from mining to retail
Discrimination	any distinction, exclusion, restriction or preference based on race, colour, sex, language, religion, political or other views, ethnic or social origin which has the purpose and/or effect of nullifying or impairing the recognition, enjoyment or exercise, on an equal footing, of human rights and fundamental freedoms
Facilitation payment	payment made in order to receive preferential service that the recipient of such a payment is expected to provide in all circumstances
Global Reporting Initiative's (GRI) Sustainability Reporting Standards	generally accepted international standards for non-financial corporate reporting on sustainable development issues, including the economic, environmental and social impacts from day-to-day operations of an organisation. The system of standards includes generalised and thematic standards, as well as industry-specific schedules
Human rights	rights inherent to all human beings, whatever their nationality, place of residence, sex, ethnic origin, colour, religion, language, or any other status. Human beings are all equally entitled to their human rights without discrimination. These rights are all interrelated, interdependent and indivisible.

Imitation/Simulant	any object or product used to simulate a diamond, but with unlike physical properties
Industrial diamonds	unworked or sawn, cleaved or bruted natural diamonds, as well as diamond powder and diamond dust, that may be used for the manufacturing of diamond instruments or other products of industrial and technical application
International Bill of Human Rights	an aggregate of international legal norms and regulations on human rights set forth in the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Covenant on Civil and Political Rights and its two Optional Protocols
Key individuals	individuals that by means of ownership or operational role are able to exercise influence on the Member's decisions
Long-term client	a client who is a party to a rough diamond supply contract with PJSC ALROSA
Non-financial report	any form of reporting documentation reflecting non-financial indicators of the organization's activities for the reporting period, a tool for analyzing and assessing the organization's activities in the economic, social and environmental fields, as well as a method of informing stakeholders about the results achieved. It can be prepared in accordance with such generally recognized international standards and guidelines as the GRI Reporting System, the International Integrated Reporting Standard and others.
Non-industrial diamonds	unworked or simply sawn, cleaved or bruted natural diamonds that may be used for the manufacturing of polished diamonds
Officer	<ol style="list-style-type: none"> a. a person, on a permanent or a temporary basis, or under a special authority, performing executive, or administrative functions in: <ul style="list-style-type: none"> • a government body, or armed forces or military formations; • a political party (except rank-and-file members); • an international public organization (e.g., IMF, UN, World Bank, etc.); b. a person performing functions of a representative of the above bodies, formations and organizations; c. a candidate for a position of authority in the above bodies, formations and organizations who has been officially nominated for this position of authority, of which an official announcement has been made.
Polished diamond	a diamond that has been specially shaped by processing so as to bring out the natural diamond brilliance at its best
Precious stones (also gemstones)	natural diamonds, emeralds, rubies, sapphires, alexandrites, and natural pearls, both in the rough form (as they are found in nature) and manufactured into polished. Artificial materials with characteristics (properties) of a precious stone do not constitute a precious stone.
Products not covered by the Guidelines	synthetic diamonds; composite (assembled) stones, where one or more parts is not a natural diamond; treated diamonds

Related parties	individuals and entities that have an ability to influence the activities of the Member
Stakeholders	individuals or legal entities or groups of persons (employees, clients, representatives of business, civil society, state authorities, local communities, trade unions, etc.) to a certain extent involved into the activities of the organisation affecting the business results of the organisation and/or affected by it
Sustainable development	<p>“the kind of development that meets the needs of the present without compromising the ability of future generations to meet their own needs”. A concept developed by UN that recognizes the role of business in ensuring sustainable development of society.</p> <p>(World Commission on Environment and Development (WCED) Report “Our common future” (UN, 1987)).</p>
Sustainable Development Goals (SDGs)	<p>a collection of 17 sustainable development goals and their 169 respective targets aimed at addressing the causes of global problems and covering three main aspects of sustainable development - economic growth, social integration and protection of environment - to be attained by 2030.</p> <p>(Document “Transforming our world: the 2030 Agenda for Sustainable Development” adopted by the UNGA Resolution of September 25, 2015).</p>
Synthetic diamond (synthetics)	a laboratory-grown material that has essentially the same chemical composition, crystal structure and physical properties as a diamond, the process of crystallization or recrystallization of which was either in part or in full performed artificially by man
Third parties	any individuals who are not employed by ALROSA ALLIANCE Members using the ALROSA ALLIANCE Logo, and legal entities that are not ALROSA ALLIANCE Members
Treated diamond	a natural diamond that has been subjected to any treatment process that constitutes an interference and/or change of the diamond’s natural appearance with the purpose of changing its original properties, other than by generally accepted diamond cutting and polishing methods and techniques
Worker	an individual who is employed by an ALROSA ALLIANCE Member

ABBREVIATIONS

GRI	Global Reporting Initiative
WDC	World Diamond Council
UNGA	United Nations General Assembly
EU	European Union
KP	Kimberley Process
ILO	International Labour Organisation
IUCN	The World Conservation Union
UN	United Nations Organisation
OECD	Organisation for Economic Co-operation and Development
UNSC	United Nations Security Council
RJC	Responsible Jewellery Council
KPCS	Kimberley Process Certification Scheme
FATF	Financial Action Task Force on Money Laundering
SDGs	United Nations Sustainable Development Goals

1. KIMBERLEY PROCESS AND THE WDC SYSTEM OF WARRANTIES

Members regard the Kimberley Process Certification Scheme and the WDC System of Warranties as a fundamental basis for the world diamond trade and a key instrument in barring diamonds from conflict areas

- 1.1. Members fully share the objectives and principles of the Kimberley Process (KP) permanently operating intergovernmental forum aimed to prevent entering of conflict diamonds to legal supply chains. When trading in rough and polished diamonds they are guided by legal norms on the implementation of the Kimberley Process Certification Scheme (KPCS) and KP industry self-regulation recommendations.
- 1.2. When trading rough and polished diamonds and diamond jewellery, Members shall fully comply with the provisions of the WDC System of Warranties, which expands the scope of the KPCS beyond export and import of rough diamonds and covers internal trade, including all segments of the diamond pipeline from mining to retail trading, and which of the utmost importance spreads the sector self-regulation to other sectors, including requirements on human rights, countering corruption, money laundering and financing of terrorism.

2. PRINCIPLES OF RESPONSIBLE BUSINESS

Members agree that conducting business responsibly and adhering to international principles and standards of business conduct lie in the core of their operations and are crucial to ensure socio-economic well-being of local communities and diamond industry as a whole.

2.1. Ethical Values and Legal Compliance

- 2.1.1. The basic principle of the Members' business is to ensure full compliance with applicable national law of the country where they conduct business. In case the national laws and regulations are insufficient or not applicable to the Member's operations, the Member shall follow applicable international laws, regulations, standards and guidelines, including UN and ILO declarations and conventions, as well as the Guidelines.
- 2.1.2. At the same time laws and market drivers cannot serve as the only business guidance for the Members. Members should operate relying on fundamental principles of responsible business policies and behavior, respect for human dignity and for the interests of other diamond industry players in the spirit of lawful and honest competition, transparency in commercial dealings, with adherence to all ethical and moral rules of conduct in accordance with specific local traditions and business culture.
- 2.1.3. Ethical conduct of business is vital for the successful development of the whole diamond industry. By adhering to ethical principles, Members contribute to value growth, promote the trust of business partners, ensure long-term competitive advantages for the industry for the good of the entire diamond pipeline. Under no circumstances will Members develop their business or work under conditions where breach of these Guidelines is possible.
- 2.1.4. All Members and their business partners are encouraged to implement and develop internal corporate mechanisms of the Guidance implementation.
- 2.1.5. For the purpose of demonstrating best practices in relation to the implementation of the Guidelines it is recommended to the Members to undertake an assessment of the effectiveness of their company mechanisms to implement the Guidelines, also through obtaining RJC certification.
- 2.1.6. Members are encouraged to comply the following key guiding principles in their diamond operations, including:
 - a. To work according to applicable laws of the countries of operations. Ensure the balance of interests of business, workers, local communities in operation areas and society at large during the process of interaction with the government and non-governmental organizations of those countries. To show responsibility in rational use of production resources, implementation of innovative technologies, creation of favorable working conditions;
 - b. To counter financial offences and infliction of financial losses on business partners, government and society. To bear with absolute honesty all the undertaken business and social obligations;
 - c. To keep business records in a way to provide full reflection of the real essence of signed deals, not to deliberately misinform, not to support any third parties in their violation of applicable laws by means of willful non-disclosure, issuance of fake documents or in any other way;
 - d. To uphold and develop multilateral trade relations, adhere to the principle of reconciliation of commercial interests and fair competition with other market players;

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- e. In the process of fixing contracts not to accept as business partners entities that conduct activities that are unlawful or questionable from the point of view of law, morality or business ethics, and entities with dubious records on the diamond market which can potentially endanger the good business reputation;
 - f. Not to trade rough diamonds from conflict areas as such trade may support military conflict and violation of human rights;
 - g. Not to conduct undisclosed and willfully undeclared trade in treated diamonds, synthetics and simulants;
 - h. Not to conduct trade with deliberate misrepresentation of information about grading characteristics of diamonds, including color, clarity, carat weight, cut and origin;
 - i. To protect the rights of owners and shareholders;
 - j. To protect human and workers' rights.

2.2. Countering Bribery and Corruption

- 2.2.1. In the process of conducting business, implementation of projects and interaction with the government, officials, politicians, investors, clients and business partners and other third parties Members adhere to the principle of zero-tolerance towards all forms of bribery and corruption.
- 2.2.2. Zero-tolerance approach underpins the Members work in rejection of direct or indirect, personal or via mediation involvement in any corruption activity, disregarding the responsible business practices.
- 2.2.3. In line with zero-tolerance to corruption and with respect towards applicable anti-corruption law Members are not to allow activities directly or indirectly aimed at:
 - a. Promising, offering or giving;
 - b. Extorting, asking for, giving consent to or acceptingof any payments in any form, including money, gifts, hospitality, other valuables, property, property rights or other material or intangible benefits transferred to or taken from any party, including officials, with the aim of influencing their actions/inactions or decisions on giving any advantages or other preferences.
- 2.2.4. Members and their workers refrain from any participation in corruption even in case of extortion and/or pressure and threats from the outside.
- 2.2.5. Members specifically reflect their negative approach towards facilitation payments that are not foreseen by applicable law, i.e. provision of payments, property, property rights, services and other material or intangible benefits aimed at securing or speeding up the implementation of standard execution of lawful procedures or actions.
- 2.2.6. Main information and data on charity and sponsorship activities of the Members is subject to public disclosure by any acceptable means.
- 2.2.7. Members do not finance political parties and movements, including their representatives.
- 2.2.8. Public relations activities of the Members may be directed at the improvement of their image and business reputation.
- 2.2.9. Members should not allow the payment of press publications and/or broadcasting of information aimed at the improvement of personal image of third parties for the purpose of subsequent decision making in favor of one of the Members.
- 2.2.10. Members are encouraged to implement effective methods of countering bribery and corruption, including as follows:

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- a. Formation of an appropriate culture of anticorruption and ethical business practices, informing all new coming and acting workers on the regulations of the applicable anticorruption law and existing internal anticorruption principles and orders;
 - b. Development and implementation of policies and procedures aimed at preventing bribery and corruption in any operations of Members' business units, subsidiaries and affiliates, and stakeholder engagement;
 - c. Ongoing monitoring of the effectiveness of the implemented procedures of control and anticorruption activities, evaluation of their sufficiency, adequacy and applicability, and their improvement according to detected shortcomings of control and/or in line with the changes in the applicable anticorruption law and/or international regulations. Conduct of due diligence if needed;
 - d. Implementation of grievance mechanism on anti-corruption and bribery, regular collection and analysis of received information;
 - e. choosing business partners considering their compliance with the requirements of the applicable law;
 - f. Initiating internal investigations on each case of corruption in accordance with the requirements of the applicable law and internal regulations within the framework of zero-tolerance towards corruption;
 - g. Ensuring of inevitability of punishment. Persons deemed guilty of breaking the anti-bribery and anti-corruption principles can be held accountable in the following forms: disciplinary liability, administrative liability, civil liability and criminal liability according to the applicable law.

2.2.11. Members' charity and sponsorship activities should comply with the following criteria:

- a. To be conducted according to the applicable law and internal corporate principles and regulations;
- b. To have positive influence on the Members' reputation and produce a tangible effect in achieving socially viable goals;
- c. Not to aim at influencing the decision-making process by governments, officials and other parties which can be connected with securing or developing of Member business or gaining any commercial and/or competitive advantages, and not to constitute a reward (including a hidden reward) to the mentioned parties.

2.3. Financial Transparency

- 2.3.1. Aiming at building trust-based relations among partners through the entire diamonds and diamond jewelry supply chain Members acknowledge the need for unconditional respect for the principles of transparency in their financial policies. Members recognize the necessity of execution of applicable national and international law in countering money laundering and financing terrorism, smuggling of diamonds, and tax evasion.
- 2.3.2. Members' conduct is judged by the whole of international community. Any misbehavior of any Member jeopardizes the reputation of ALROSA ALLIANCE Logo, affects the business value of other Members and entails common reputation risks. In the light of the above mentioned, Members acknowledge the need for extra cautious approach in choosing their business partners.
- 2.3.3. Independent financial audit conducted in accordance with the international reporting standards is acknowledged by the Members as the most appropriate method of confirming their own financial and business good standing.
- 2.3.4. Members are to provide financial transparency of their business by observing applicable national law and international regulations, including but not limited to:

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- a. 40 Recommendations of FATF, adopted in 1990 and revised in 2012;
 - b. Convention of Council of Europe "On Laundering, Search, Seizure and Confiscation of the Proceeds from Crime" adopted in 1990.
- 2.3.5. Within the scope of their actions to provide financial transparency of their business Members can conduct complex legal and financial due diligence of business partners on adherence to applicable law.

2.4. Responsible Supply Chains and Information Disclosure

- 2.4.1. The establishment of a responsible diamond supply chain from mine to retail is an important element in ensuring transparency of the diamond industry as a whole and individual business of every member of the diamond pipeline. Responsible supply chain is based on the principle of unconditional disclosure of information on a conflict-free source and quality characteristics of diamond goods at every stage of change of ownership with the aim of promoting consumer confidence in diamonds.
- 2.4.2. In order to ensure transparency of the diamond supply chain and to ban diamonds from conflict-affected areas in it Members encouraged to follow the provisions of OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas;
- 2.4.3. In their business transactions related to sale and purchase of diamonds and diamond jewelry the Members are encouraged to declare in writing, and without any equivocation, either in a sales agreement, or on invoices, that the diamonds were purchased from legal sources not involved in financing conflicts, in compliance with the UN resolutions and international regulations, and that the diamonds are of natural origin and characteristics.
- 2.4.4. Members are encouraged to declare the country of origin of the rough diamonds sourced from ALROSA, highlighting the exclusively natural and non-conflict origin of these goods, and also the fact that they have been produced responsibly and in adherence to best business standards.

2.5. Advocacy for and promotion of natural diamonds

- 2.5.1. Members may only use ALLROSA ALLIANCE Logo for entities that are exclusively natural diamond businesses, i.e. any entity that has both natural diamond business activities and business activities relating to products not covered by the Guidelines is prohibited from using ALROSA ALLIANCE Logo in any capacity.
- 2.5.2. Members should set up distinct independent trading and sales/marketing entities for business activities relating to products not covered by the Guidelines, with separate systems, processes and workforces. Key individuals of a Member should not take positions of Key individuals in such a distinct entity. The name of such a distinct entity should not be neither the same as the name of the Member nor similar to the name of the Member.
- 2.5.3. In case the Members and/or their Key individuals and/or their Related Parties and/or individuals/entities in relation to which Members are Related Parties have an intent to start business activities relating to products not covered by the Guidelines, they shall give a prior notice to PJSC ALROSA. PJSC ALROSA reserves the right to terminate the ALROSA ALLIANCE Logo License Agreement.
- 2.5.4. Members shall take steps to ensure that diamonds, products not covered by the Guidelines and imitations of diamonds are segregated down the Member's value chain as far as the ultimate consumer.
- 2.5.5. Members shall have and implement demonstrably robust segregation policies and procedures in storage, cutting, polishing, manufacturing, processing, packaging and transport, striving for complete segregation of diamonds and products not covered by the Guidelines as well as imitations of diamonds in separate sites to eliminate the risk of mixing and contamination of products.

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- 2.5.6. Members shall implement robust, risk-based testing protocols that identify, assess and mitigate risks of mixing and contamination of natural diamonds and products not covered by the Guidelines as well as imitations of diamonds.
 - 2.5.7. Prior to the completion of each transaction relating to products not covered by the Guidelines or imitations of diamonds Members shall ensure that full disclosure, with complete and unambiguous information, is provided to the counterparty or consumer (as applicable), so that they are fully informed about their purchase.
 - 2.5.8. Members shall comply with applicable disclosure, labelling, advertising and marketing laws, regulations and best practice standards.
 - 2.5.9. When disclosing information on diamond products, products not covered by the Guidelines and imitations of diamonds Members must use in relation thereto the terms, definitions and classification set forth in, but not limited to:
 - a. ISO 18323:2015 Standard "Jewellery – Consumer Confidence in the Diamond Industry";
 - b. CIBJO Diamond Blue Book;
 - c. Diamond Terminology Guideline supported by the Diamond Producers Association.
 - 2.5.10. Members shall under no circumstances mislead the buyer or withhold information about the origin and quality characteristics of products not covered by the Guidelines and imitations of diamonds.
 - 2.5.11. The term "diamond" may only be used in relation to products not covered by the Guidelines and imitations of diamonds if it is directly preceded by the information on man-made origin of such a stone, or about the treatments it has been exposed to, or its other significant features in a form described in these Guidelines.
 - 2.5.12. Definitions "real", "genuine", "precious", "natural", "authentic" may not be used to describe products not covered by the Guidelines or imitations of the diamonds.

Diamonds

- 2.5.13. Members shall under no circumstances mislead the buyer and withhold information about the origin and quality characteristics of diamonds and diamond jewellery.
- 2.5.14. Certified information (specification) on a polished diamond should reflect its main characteristics – carat weight, color, clarity and cut, graded according to applicable international or national system of classification.

Synthetic diamonds

- 2.5.15. Information on the partially or entirely synthetic origin of a product is subject to unconditional disclosure and must be incorporated in all documents accompanying a sale or purchase of the stone. The descriptive attributes "synthetic", "laboratory-grown" or "laboratory-created" must always immediately precede the word "diamond" in their unabbreviated forms.
- 2.5.16. It is unacceptable to use in sales documents in relation to synthetic diamonds the definitions "cultured", "grown/created", "man-made", "enhanced" or other terms misleading or concealing the synthetic origin of the products.
- 2.5.17. Members must provide the appropriate training to relevant personnel on operational, commercial and reputational impacts of synthetic diamonds.
- 2.5.18. Members and their Key Individuals must not make any false, misleading or unsubstantiated claims regarding the enduring value of synthetic diamonds, claims on benefits to the environment or ethical claims of synthetic diamonds over natural diamonds at business-to-business and/or business-to-consumer level.
- 2.5.19. Members and their Key Individuals must not use terminology stating or implying that synthetic diamonds have the identical inherent value characteristics as natural diamonds at business-to-business and/or business-to-consumer level.

2.5.20. As a manufactured product, synthetic diamond specification shall include information on (a) country of origin (where synthetic diamond was created); (b) country of manufacture into polished synthetic diamond/made to jewellery; and (c) the manufacturer.

2.5.21. Synthetic diamond specification must not use generally accepted grading language without modifiers and clear qualification it is laboratory-grown.

Treated Diamonds

2.5.22. Information on diamond treatments including the methods of treatment is subject to unconditional disclosure and must be incorporated in all sale and purchase documents. The attribute "treated" (or the description of a treatment method) must always immediately precede the word "diamond" and clearly state its treated characteristics. At the same time, the use of the descriptive expression "natural treated" is unacceptable.

2.5.23. Treatment means any process of interference to transform the original characteristics of a natural diamond, including the change of its natural appearance or properties, other than by generally accepted practices and methods of diamond cutting and polishing. Treatment includes but not limited to the following methods:

- a. Change of colour including by means of:
 - i. Irradiation combined with heat treatment;
 - ii. Heat treatment in vacuum;
 - iii. Heat treatment under pressure;
 - iv. Coloured diamond coating;
- b. Laser drilling;
- c. Radioactive irradiation;
- d. Fracture filling;
- e. Special materials coating.

2.5.24. The use in sales documents of descriptive expressions "enhanced", "improved", "ennobled" and other terms reflecting value judgment of the results of treatment of a natural diamond is unacceptable.

Composite (assembled) stones

2.5.25. Information about composite (assembled) stones is subject to unconditional disclosure. The use of term "diamond" in relation to such stones is unacceptable.

2.5.26. It is unacceptable to use terms and definitions misleading as to composite (assembled) stones and/or concealing information about their parts.

Imitations of diamonds

2.5.27. Information on imitations of diamonds is subject to unconditional disclosure with a direct reference that the stone is not a diamond.

2.5.28. When any artificial product is used to imitate a diamond it shall be described by its proper name ("glass", "plastic", "synthetic corundum", "cubic zirconia" etc.), or by the name "imitation of diamond" or "diamond simulant", and the description shall be immediately apparent and unambiguous.

2.5.29. A stone of natural origin other than diamond whose colour, cut and appearance might be misrepresented as a diamond shall always be referred to by its mineral name, and not described as "imitation of diamond".

3. SOCIAL RESPONSIBILITY

Members assume responsibility for their social obligations and strive to contribute to sustainable development of the regions of operations and well-being of local communities. Members acknowledge that workers are their most important asset and strive to secure their well-being, professional and personal fulfillment, which contributes to sustainable development of the entire diamond industry.

3.1. Human Rights

- 3.1.1. Members are committed to respect all internationally recognized human rights and freedoms and strive to conduct their business in compliance with the applicable international and national laws and regulations, as well as UN Guiding Principles on Business and Human Rights based on the International Bill of Human Rights (including the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights and the International Covenant on Civil and Political Rights with its two Optional Protocols) and the ILO Declaration on Fundamental Principles and Rights at Work.
- 3.1.2. To uphold their obligations in respecting human rights Members develop and implement internal policies on securing and protecting human rights in accordance with these Guidelines taking into account the scale of their business, geographical and industry specifics and firmly follow these policies in their daily work.
- 3.1.3. To detect, prevent and mitigate any potential adverse impacts on human rights Members make appropriate compensations and assess the effectiveness of adopted measures in accordance with applicable law and internal regulations.
- 3.1.4. Members inform the employees, business partners and other stakeholders on their human rights policy and other relevant documents on human rights respect and protection.

3.2. Countering discrimination

- 3.2.1. Members declare their unacceptance of any forms of discrimination. Members strive to ensure their workers equal employment opportunities regardless of gender, race, nationality, spoken language, descent, material, social and formal position, age, place of residence, religion, political views, membership or non-membership in any associations, and other circumstances not connected with professional merits of the worker.

3.3. Countering forced labor

- 3.3.1. Members conduct their business in compliance with the Universal Declaration of Human Rights and the ILO Convention No. 29 on forced and compulsory labor and other international principles and applicable laws that prohibit the use of forced labor.
- 3.3.2. Members do not engage in or support the use of forced labour. As well, Members take appropriate measures to detect and prevent the use of forced labour in their supply chain.

3.4. Countering child Labor

- 3.4.1. Members shall fully comply in their activities with the provisions of the ILO Convention N° 138 On Minimum Age, and also shall be guided by ILO Recommendations and other international agreements, and shall not engage in/or support child labor.
- 3.4.2. The minimum age for admission to employment, as defined by the ILO Minimum Age Convention, shall be equal to or exceed the age of the completion of compulsory schooling and, in any case, shall not be under 15. Members from countries with developing economies and education systems that, subject to consultations with interested employer and worker

organizations, allow for the minimal age for admission to employment at 14, shall, on a voluntary basis, undertake their best efforts to raise the minimum age for admission to employment to 15.

- 3.4.3. Members shall comply fully with the provisions of the ILO Convention on the prohibition and elimination of worst forms of child labor.

3.5. Labor Rights and Employment

- 3.5.1. Provision of better working conditions is an integral principle of Members' business. Security of labor rights of workers is acknowledged as an important feature of development of the entire diamond industry and its human capital in conditions of ever increasing competition for skilled labor on the international labor market. All Members declare their aspiration to fully observe their obligations with regards to labor rights of workers, including within the framework of establishing, executing and terminating of labor relations according to applicable law, and clear understanding of employment conditions by the worker.

- 3.5.2. Members ensure timely and full payment of fair wages to their workers not lower than the minimum wage established by national legislation.

- 3.5.3. Members comply with the requirements of applicable national law on working hours, rest periods, weekends and non-working holidays, paid annual leave.

- 3.5.4. Members recognize the right of workers to collective bargaining in accordance with the applicable law. Their efforts in building relations with workers organizations/labor unions shall be focused on:

- a. Interaction with workers organizations/labor unions with respect to providing safe and adequate working conditions and decent pay, taking into account workers organizations/labor union recommendations;
- b. Collective bargaining with respect to worker recreation and health improvement opportunities, and other issues, related to provision of worker benefits;
- c. Negotiating and signing collective agreements;
- d. Creating a system of employer-worker relations that would as much as possible contribute to sustained and productive operation, successful long-term development, strengthening of international prestige and business reputation of the diamond industry;
- e. Improving the living standards of workers and their families;
- f. Translating into practice of social partnership principles and employer-worker mutual responsibilities.

- 3.5.5. Members strive to foster principles of social partnership and implement voluntary corporate initiatives aimed at skills development and improvement of social status of workers, including skills development and professional training programs, encouragement and provision of opportunities for workers to receive additional education.

Within the scope of own development plans (if any) the Members widely support the implementation of additional measures on promoting social security of workers based on principles of equality and universal availability.

- 3.5.6. Members support in every possible way the building and developing of corporate relationships between Members and their workers, including as follows:

- a. Creating a sustainable corporate culture and a system of company values, acknowledging willingness at all times to adhere to high standards of business conduct;
- b. Establishing standards of corporate conduct regulating internal relationships, employer-worker relationships, relationships with business partners, government bodies, general public;
- c. Developing of a unified corporate culture based on high ethical standards, building confidence, encouraging mutual respect and human decency;

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- d. Defining general principles for preventing a possible conflict of interests;
 - e. Building the workers' awareness of their personal responsibility for meeting the Guidelines in their day to day relations with business partners;
 - f. Maintaining and strengthening investors' confidence in Members, fostering the reputation of the latter as open, honest and trustworthy representatives of the diamond community;
 - g. Introducing and developing a unified system of internal communications;
 - h. Adopting a Company Code of Business Ethics and the system for its implementation.

3.6. Health and Safety

- 3.6.1. Members shall provide healthy and safe working conditions for their workers and implement measures on preventing risk of accidents and professional diseases.
- 3.6.2. In their actions to steadily decrease operational risks to the level of international health and safety standards Members shall be guided by the following principles:
 - a. Priority of workers' life and health over production;
 - b. Incentive for the management to provide healthy and safe working conditions;
 - c. Motivation of workers for responsible behavior at production facilities.
- 3.6.3. Health and safety policy is aimed at:
 - a. Safe production through operation risks management, unconditional compliance with the applicable international and national laws and other requirements;
 - b. Steady improvement of the health and safety management system;
 - c. Development of corporate strategy, business plans and investment projects with the account of due health and safety level;
 - d. Continuous increase of workers competence and awareness of health and safety requirements;
 - e. Assignment of personal responsibility and offering incentives for workers in the sphere of health and safety;
 - f. Promoting dialogue with all interested parties and provision of Members' open and publicly available data on health and safety.
- 3.6.4. Members agree that main factors that determine production safety are as follows:
 - a. Compliance of technologies and development solutions applied by them with the requirements of production safety;
 - b. Fault-free operating conditions of facilities, equipment, technical devices applied at hazardous production facilities;
 - c. Careful development of documentation and accurate record-keeping in accordance with prescribed safety requirements and other regulations;
 - d. Due preparation and performance of hazardous operations;
 - e. Healthy and safe working conditions at workplace;
 - f. Staffing of hazardous production facilities with qualified personnel, regular training and safety certification;
 - g. Maintaining effective technological and labor discipline, proper fulfillment by workers of their duties to provide safe operation of hazardous facilities;
 - h. Workers' preparedness for fault isolation and accident elimination;

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- i. Ensuring and maintaining operational control over observation of safety rules at hazardous facilities.
- 3.6.5. Members are encouraged at their own expense to timely provide workers with working clothes and footwear and other personal protection equipment as prescribed by applicable law and regulations, as well as their storage, cleaning, drying, repair and change.
- 3.6.6. In accordance with applicable law, Members are encouraged to allocate funds to conduct regular medical examinations of their workers who handle hazardous substances or work in hazardous conditions, at duly licensed and certified medical and preventive treatment institutions.
- 3.6.7. Members shall conduct preventive checks, analysis and evaluation of their health and safety management system to assess its efficiency as well as investigate accidents, breakdowns and other incidents to reveal their causes to prevent them in future.
- 3.6.8. Members implement programs in the sphere of environmental safety aimed at reducing negative impact of production on the environment, protecting health and well-being of workers and the population in the areas where they conduct their business.
- 3.6.9. To provide environmental safety Members:
- a. Monitor the state of environment and health of population in the areas of their activities;
 - b. Introduce advanced technologies and equipment reducing the negative impact on environment from emissions, faulting, wastes;
 - c. Carry out land rehabilitation and improvement of the territories of production facilities and adjacent settlements.
- 3.7. Support of Local Communities**
- 3.7.1. Members develop and implement comprehensive programs to support local communities and indigenous people, including:
- a. Improvement of social infrastructure;
 - b. Promotion of programs for development of science, education, culture, sports and medicine;
 - c. Carrying out actions to reduce negative impact on environment and protect it;
 - d. Performance of charity and sponsorship activities.

4. ENVIRONMENT

Members take decisive actions aimed at reducing negative impact on the environment, rational use of mineral resources, environment and biodiversity protection, which contribute to the sustainable development and well-being of the local communities.

- 4.1. Members shall comply with the applicable national law on environmental protection; as well, they also consider relevant international law, standards and regulations.
- 4.2. Members develop environmental policies and relevant programs of their implementation.
- 4.3. To prevent and minimize negative impact on the environment and to manage environmental risks Members implement and improve environmental management systems based on the following fundamental principles:
 - a. Minimizing negative environmental impact by implementing management and technological solutions, taking into account significant environmental aspects;
 - b. Exercising control over the use of natural resources within the scope of Members' business, and promoting initiatives for their efficient use;
 - c. Monitoring wastes and exhausts generated in their business processes, applying the principles of reduce, recover, re-use and recycle to reduce their environmental impact in accordance with the applicable law, or where applicable law does not exist, guided by prevailing international standards;
 - d. Maintaining the inventory of hazardous substances at facilities, introducing a ban on the manufacture, trade and/or use of chemicals and hazardous substances which are a subject to international bans, using of technically and economically viable alternatives to hazardous substances in their activities;
 - e. Continuous improvement of the environmental management system;
 - f. Introduction of advanced technologies providing high level of environmental safety in all spheres of activities;
 - g. Raising environmental awareness among workers and involvement of workers in activities aimed at reduction of environmental risks;
 - h. Ensuring of transparency and accessibility of environmental information, informing stakeholders on their environmental activities;
 - i. Conducting environmental monitoring and regular environmental audit to evaluate the effectiveness of the environmental policy;
 - j. Conservation of biodiversity in the territories where production facilities are located, protection of endangered species of animals and plants included in the International Union for Conservation of Nature Red List of Threatened Species.

5. NON-FINANCIAL REPORTING

Disclosure of information on sustainability and responsible business practices is a significant factor in building stakeholder trust.

- 5.1. As one of the largest diamond mining companies, PJSC ALROSA is committed to ensure maximum transparency for the stakeholders and consistently implement leading international standards and practices in the field of information transparency.

As part of its commitments, PJSC ALROSA annually publishes sustainability reports with key results and achievements in economic, environmental and social aspects prepared in accordance with the requirements of the Global Reporting Initiative (GRI) Standards.

As well, PJSC ALROSA annually assesses its contribution to the achievement of the UN Sustainable Development Goals and discloses information on the key achievements.
- 5.2. PJSC ALROSA encourages Members to disclose information on the key results of sustainable development activities (including corporate governance, responsible business practices, social aspects and environmental protection) and their contribution to the achievement of the UN Sustainable Development Goals, and publish non-financial reports.
- 5.3. In order to ensure information transparency and enhance the stakeholders' confidence PJSC ALROSA encourages Members to conduct the independent external assurance of their annual non-financial reports.
- 5.4. PJSC ALROSA welcomes the certified membership of Members in the Responsible Jewellery Council, which as well will be considered as the confirmation of compliance with the number of provisions of these Guidelines and ensuring of independent external assurance of their implementation.

6. REFERENCES

ALROSA ALLIANCE Guidelines on Responsible Business Practices are based on provisions of the key documents, including but not limited to:

INTERNATIONAL ACTS

United Nations

- United Nations Millennium Declaration (2000)
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- United Nations Sustainable Development Goals. Transforming our world: the 2030 Agenda for Sustainable Development (2015)
https://www.un.org/ga/search/view_doc.asp?symbol=A/RES/70/1&Lang=E
- International Bill of Human Rights
<https://www.ohchr.org/Documents/Publications/FactSheet2Rev.1en.pdf>
- Universal Declaration of Human Rights (UDHR) (1948)
<https://www.un.org/en/universal-declaration-human-rights/>
- International Covenant on Civil and Political Rights (1966)
<https://www.ohchr.org/EN/ProfessionalInterest/Pages/CCPR.aspx>
- International Covenant on Economic, Social and Cultural Rights
<https://www.ohchr.org/EN/ProfessionalInterest/Pages/CESCR.aspx>
- International Convention on the Elimination of All Forms of Racial Discrimination (1963)
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- Declaration on the Elimination of All Forms of Intolerance and of Discrimination Based on Religion or Belief (1981)
<https://www.ohchr.org/EN/ProfessionalInterest/Pages/ReligionOrBelief.aspx>
- United Nations Declaration against Corruption and Bribery in International Commercial Transactions (1996)
<https://www.unodc.org/pdf/crime/commissions/11comm/6e.pdf>
- Rio Declaration On Environment And Development (1992)
https://legal.un.org/avl/pdf/ha/dunche/rio_ph_e.pdf
- United Nations Conference on Sustainable Development (UNCSD) (2002)
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- International Convention on the Elimination of All Forms of Racial Discrimination (1965)
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- United Nations Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (commonly known as the United Nations Convention against Torture (UNCAT)) (1984)
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- Convention on the Rights of the Child (1989)
<https://www.ohchr.org/EN/ProfessionalInterest/Pages/CRC.aspx>
- United Nations Convention against Corruption (2003)
https://www.unodc.org/documents/dohadeclaration/JI/UNCAC/UNCAC_-_English.pdf

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- Convention on the Rights of Persons with Disabilities (2006)
<https://www.ohchr.org/EN/HRBodies/CRPD/Pages/ConventionRightsPersonsWithDisabilities.aspx>
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 - UN Global Compact (2004)
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 - UN Global Plan of Action to Combat Trafficking in Persons (2010)
<https://www.un.org/pga/72/event-latest/global-plan-of-action-to-combat-trafficking-in-persons/>
 - United Nations Office on Drugs and Crime (UNODC) Global Programme against Money-Laundering, Proceeds of Crime and the Financing of Terrorism (1997)
<https://www.unodc.org/>

International Labour Organisation

- ILO Convention No. 29 on Forced Labour Convention (1930)
https://www.un.org/ruleoflaw/files/ILO_Convention_29.pdf
- ILO Convention No. 87 on Freedom of Association and Protection of the Right to Organise Convention (1948)
https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C087
- ILO Convention on Right to Organise and Collective Bargaining Convention (1949)
https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C098
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https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_INSTRUMENT_ID:312256:NO
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- ILO Convention No. 142 on Human Resources Development Convention (1975)
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- ILO Convention No. 159 on Vocational Rehabilitation and Employment (Disabled Persons) Convention (1983)
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- ILO Worst Forms of Child Labour Convention No. 182 (1999)
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European Union

- Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime (1990)

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- Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism (2005)
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- DIRECTIVE 2001/97/EC of the European Parliament and of the Council amending Council Directive 91/308/EEC on prevention of the use of the financial system for the purpose of money laundering (2001)
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Other documents

- 40 FATF (Financial Action Task Force) Recommendations (as revised in 2012)
<http://www.fatf-gafi.org/publications/fatfrecommendations/documents/fatf-recommendations.html>
- OECD Guidelines for Multinational Enterprises (2011)
<http://www.oecd.org/daf/inv/mne/48004323.pdf>
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
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- World Diamond Council System of Warranties Guidelines (2018)
<https://www.worlddiamondcouncil.org/introduction-system-of-warranties/>
- RJC Code of Practices (2019)
<https://www.responsiblejewellery.com/files/RJC-COP-December-2019.pdf>

RUSSIAN ACTS

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<http://www.constitution.ru/en/10003000-01.htm>
- Federal Law No. 197-FZ "Labor Code of the Russian Federation (2001)
<https://www.ilo.org/dyn/natlex/docs/WEBTEXT/60535/65252/>
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<https://www.bsigroup.com/en-GB/ohsas-18001-occupational-health-and-safety/Introduction-to-BS-OHSAS-18001/>
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<https://www.iucnredlist.org/>

PJSC ALROSA DOCUMENTS

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- Code of Corporate Governance
<http://www.alrosa.ru/wp-content/uploads/2017/12/Code-of-Corporate-Governance-of-PJSC-ALROSA.pdf>
- Code of Corporate Ethics
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- Communications Policy
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<http://www.alrosa.ru/wp-content/uploads/2016/08/Соц-пол-2016-m.pdf>
- Occupational Health and Safety Policy
<http://www.alrosa.ru/wp-content/uploads/2018/04/Политика-АК-АЛРОСА-в-области-охраны-труда-и-промышленной-безопасности.pdf>
- Policy on Countering Bribery and Corruption
<http://www.alrosa.ru/wp-content/uploads/2018/01/Policy-on-Countering-Bribery-and-Corruption-of-PJSC-ALROSA.pdf>
- Regulations on the procedure and terms of sales of natural rough diamonds
<http://sales.alrosa.info/rough-diamonds/auctions/regulations/>
- Social and Environmental reports
<http://eng.alrosa.ru/documents/social-reports/>

DISCLAIMER

In accordance with the national law and international obligations of the Russian Federation PJSC ALROSA regards the Guidelines to be an important mechanism for:

- Implementing best practices of responsible business conduct;
- Enhancing trust in relations with long-term customers, eliminating any unfair practices, including those related to disclosure of information for the purposes of rough diamond purchase and sale transactions.

In their activities, Members are to be fully compliant with applicable national and international laws. Adherence to the Guidelines shall not be regarded as a ground for non-compliance with national laws or norms of international law referred to or mentioned in these Guidelines. By introducing the ALROSA ALLIANCE Guidelines on Responsible Business Practices PJSC ALROSA shall not bear responsibility for any action of long-term clients or other entities or individuals that leads to a breach of the regulations or laws on which these Guidelines are based.

PJSC ALROSA shall not be responsible for the completeness and accuracy of information contained in third party documents and sources, as well as on websites referenced herein.

Should you have any further queries, please contact PJSC ALROSA. You will find the contact details at:

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