



7 April 2021

Petra Diamonds Board Members
Petra Diamonds Limited
1st Floor, 52-53 Conduit Street
London
W1S 2YX
United Kingdom

Via Email

Dear Board Member,

Re: Human rights concerns at the Williamson Diamond Mine

In your capacity as a member of the board of Petra Diamonds, we are writing regarding the public statement that Petra Diamonds is due to issue shortly about the human rights situation at the company's Williamson Mine in Tanzania. On 30 March, the company [said](#) its statement would be published around the end of April 2021. We are reaching out to you ahead of this with our input.

As you may know, RAID has researched and drawn attention to human rights abuses at the Williamson Mine. We published our report [The Deadly Cost of 'Ethical' Diamonds](#) in November 2020 highlighting the abuses since Petra Diamonds took over the mine in 2009. We have [corresponded](#) with Petra Diamonds' chief executive officer, Richard Duffy, met with members of the senior management team, and have also [responded publicly](#) to statements made by Petra Diamonds on the human rights situation at the Williamson Mine.

Since publication of our report in November 2020, we have felt it necessary to publish two further human rights updates. On 11 February 2021, we provided [details of new reports](#) we received of assaults, including shootings, by security personnel at the mine between November 2020 and January 2021. Following that, on 25 March 2021, we published [new information](#) on how Zenith Security guards deliberately swapped rubber projectiles with metal shot in their weapons, and had been issued with metal projectiles in contrast to what senior management said was its policy, causing serious harm to local residents shot on the Williamson concession.

While we expect that our reports were not easy reading for you and other board members, we trust that you have been fully informed about these matters and the responses provided by Petra's management to RAID's letters and publications.

In public statements Petra Diamonds said that an investigation by a specialist external adviser in conjunction with the company's lawyers was underway (as well as referring to an investigation by Williamson Diamonds Limited). It said a sub-committee of the Board, comprised of independent Non-Executive Directors, was to "consider the outcome of the investigation and the recommendations to address any findings", which "may include any required remedy or corrective action to be taken as a result of the investigation's conclusions".

Mindful of the role the board is playing in overseeing this investigation, we wanted to reach out to you ahead of the publication of the company's statement to remind you of the recommendations that RAID made in its November 2020 report. We believe that enacting these recommendations is fundamental to any meaningful effort to address the human rights concerns identified. We have attached them again for your ease of reference.

The credibility of Petra Diamonds' forthcoming public statement and its response to the human rights situation at Williamson Mine, in our view, will depend upon full and transparent reporting of the findings of the investigation and independent oversight of how the company is addressing the human rights issues going forward. Simply providing a short summary would fail to provide confidence that Petra Diamonds has fully grasped the extent of the human rights concerns nor would it give confidence that action is being taken to prevent harm in the future.

We hope the Board will support this approach of transparency and independent oversight.

In Petra's forthcoming statement, we believe it is vital that the following information is published (including in Swahili) to inform not only the market, but also, crucially, local communities and other relevant stakeholders:

- a) The investigation results in detail, including how it was conducted and its main findings;
- b) The steps the company has taken, or will take, to ensure accountability, including legal accountability where appropriate, for the harms caused to local residents;
- c) The contract and security arrangements with GardaWorld, the new security provider at the Williamson Mine, withholding only information essential for reasons of commercial confidentiality;
- d) The Memoranda of Understanding with the Tanzanian police in place at the Williamson Mine, including the updated 2019 version and any that preceded it;
- e) The policies governing the use of force;
- f) Procedures for the existing "first tier" grievance mechanism and a commitment to publish a timetable and full details of the "second tier" mechanism envisaged to provide further remedy, including how it will operate.

It will undoubtedly take some time for Petra Diamonds to build up confidence with the local community and other stakeholders that it is fully addressing the human rights issues. In the coming months and years, Petra Diamonds will need to dramatically enhance its reporting on human rights. In this regard, we urge the board to ensure regular public reporting on human rights alongside the company's financial reports. This should include:

- g) On at least a quarterly basis, all deaths (including killings), sexual violence, injuries (including assaults), detentions, and any other human rights abuses at the Williamson Mine at a sufficiently detailed level to allow for independent monitoring and oversight;
- h) Details regarding the operation of the grievance mechanism, including the number of grievances received, what they concerned, and how they were resolved.

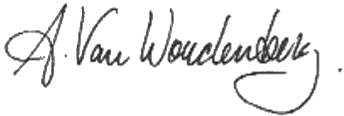
Going forward, we believe independent oversight will be required, including of:

- i) The steps and actions the company is taking to address the human rights issues raised and publicly report on progress;
- j) Investigations into allegations of human rights abuses and processes by which redress is provided, including
 - o grievance mechanisms;
 - o and community-level initiatives to further social investment and improve livelihoods.

This independent oversight should be at arms-length from the company and include adequate and meaningful local community representation, experts in human rights, and respected Tanzanian civil society, amongst others.

Please do not hesitate to contact me if you have any questions or if you or other board members wish to discuss this further.

Yours sincerely,

A handwritten signature in black ink that reads "A. Van Woudenberg". The signature is written in a cursive style with a large, looping initial "A" and a trailing flourish.

Anneke Van Woudenberg
Executive Director

Cc: Richard Duffy, CEO