

Discrimination / Discipline

Submittance of complaints — Policy

Policy statement

- o GLD Diamonds Ltd. Considers its employees as the main asset of the organization and recognizes that the employees are a main source of information with regard to deviation of company and legal standards.
- o Subsequently GLD Diamonds Ltd. Declares that it encourages employees to submit complaints of any kind as it is Company's belief that satisfied employees care about their employer and complaints made by employees, whether against a colleague, a superior, a client or a supplier, are considered improvement opportunities.
- o GLD Diamonds Ltd. Is aware of the fact that complaining against a colleague is sometimes considered as an act of unloyalty within the employee's environment and will therefore provide procedures for these complaints to be submitted in confidence.

Management and control

- The management of GLD Diamonds Ltd. Takes full responsibility for this policy and for its distribution and implementation throughout the organization.
- The management of GLD Diamonds Ltd. Will nominate a "person of confidence". This person will be accessible to all employees and record their complaints in full confidence.
- The person will periodically report to the management of GLD Diamonds Ltd. With regard to the nature of complaints and solutions provided. Though still without any reference to personal details of employees involved.
- The nomination of the "person of confidence" will be published by o GLD Diamonds Ltd. And all employees will be made aware of his existence and of confidential ways of accessing him.

Note: this policy is signed and filed in official GLD Diamonds Ltd. Records after being communicated to all employees and is part of a set of policies presented to new employees.

Haim Giladi

Non-discrimination — Policy

Policy statement

- GLD Diamonds Ltd. is committed to a non-discrimination philosophy and declares to actively prevent any discrimination based on race, national origin, religion, age, disability, physical appearance, gender, marital/parental status, sexual orientation, HIV status, migrant status, membership of worker representative bodies or political affiliation
- GLD Diamonds Ltd. is committed to avoid denial of rights to employees based on their religious affiliation, nationality, origin, age, state of health and family status.

Management and control

- o The management of GLD Diamonds Ltd. takes full responsibility for this policy and for its distribution and implementation throughout the organization.
- o The management of GLD Diamonds Ltd. prohibits any harassment, either physical or verbal, of employees.
- o The management of GLD Diamonds Ltd. prohibits actions that might harm the positive atmosphere at the company.
- o The management prohibits any kind of behaviour that might be interpreted as sexually offending oriented.
- o The management states that it has nominated a "person of confidence". This person is accessible to all employees in order to record their complaints in full confidence.
- o The management states that any breach in aforementioned might lead to disciplinary measures, depending on the circumstances.

Implementation and continuous improvement

The management of GLD Diamonds Ltd. is committed to the development, implementation (communicating to and educating employees) and continuous improvement of non-discrimination relevant procedures.

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Haim Giladi

Disciplinary Appeal Procedure

Appeals are for correcting errors in decision making. An Appellant cannot challenge a decision simply because he or she disagrees with it; allowing an Appellant to appeal a decision on its merits simply because he/she doesn't like the outcome does a great disservice to those who made the decision in the first place.

The Appeal Procedure outlines the internal process approved by the Management. While the Management have the authority to make decisions according to the power invested in them from the governing documents of the company, there is also a requirement to ensure that employees have a process to appeal decisions within a final framework of operation.

Any appeal should be submitted in writing to the General Manager within 7 days of disciplinary action being taken.

The employee may appeal on the grounds that: -

- (a) there was a material procedural irregularity which rendered the process leading to unfair decision;
- (b) that the penalty imposed was too severe as being disproportionate to the charge; or
- (c) that material of which the employee could not reasonably have been expected to be aware at the time of the original decision casts substantial doubt upon the correctness of that decision.

The appellant (or representative) will put their case in the presence of the General Manager. They may call witnesses and produce documentary evidence.

Both the General Manager and the Appellant (or representative) will then have the opportunity to sum up their case.

Haim Giladi