

FISCHLER DIAMONDS

FISCHLER DIAMONDS NV Supply chain policy

1. FISCHLER DIAMONDS NV is a diamond trading company. This policy confirms FISCHLER DIAMONDS NV's commitment to respect human rights, avoid contributing to the finance of conflict and comply with all relevant UN sanctions, resolutions and laws.

2. FISCHLER DIAMONDS NV is a Certified Member of the Responsible Jewellery Council (RJC). As such, we commit to proving, through independent third-party verification, that we:

- a. respect human rights according to the Universal Declaration of Human Rights and International Labour Organization Declaration on Fundamental Principles and Rights at Work (See COP 6);
- b. do not engage in or tolerate bribery, corruption, money laundering or finance of terrorism (See COP 12);
- c. support transparency of government payments and rights-compatible security forces in the extractives industry;
- d. do not provide direct or indirect support to illegal armed groups (See COP 29);
- e. enable stakeholders to voice concerns about the jewellery supply chain; and
- f. are implementing the OECD five-step framework as a management process for risk-based due diligence for responsible supply chains of minerals from conflict-affected and high-risk areas (See COP 7).
This process will be led by the Company's CEO, who will provide the necessary resources and manpower to create sustainable management systems that will allow the Company to implement the OECD framework in a time-frame consistent with the RJC timelines foreseen for the COP7 standard.

3. We also commit to using our influence to prevent abuses by others. We will inform our suppliers of the existing policy in a structured way and attract their attention specifically to article # 5 & 7 of this policy, which may imply direct termination of our commercial relationships with them.

We will also inform our customers of our policy and ask them to be vigilant and to report any possible abuses they might come across in the supply chain where we might be concerned.

4. **Regarding serious abuses associated with the extraction, transport or trade of minerals:** We will neither tolerate nor profit from, contribute to, assist or facilitate the commission of:

- a. torture, cruel, inhuman and degrading treatment;
- b. forced or compulsory labour (See COP 20);
- c. the worst forms of child labour (See COP 19);
- d. human rights violations and abuses (See COP 6); or
- e. war crimes, violations of international humanitarian law, crimes against humanity or genocide (See COP 29).

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5. We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are committing abuses described in paragraph 4 or are sourcing from, or linked to, any party committing these abuses.

6. **Regarding direct or indirect support to non-state armed groups:** We only buy or sell products that are fully compliant with the Kimberley Process Certification Scheme and, as such, will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring diamonds from, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates who illegally:

- a. control mine sites, transportation routes, points where diamonds are traded and upstream actors in the supply chain; or
- b. tax or extort money or diamonds at mine sites, along transportation routes or at points where diamonds are traded, or from intermediaries, export companies or international traders.

7. We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are sourcing from, or are linked to, any party providing direct or indirect support to non-state armed groups as described in paragraph 6.

8. **Regarding public or private security forces:** We affirm that the role of public or private security forces is to provide security to workers, facilities, equipment and property in accordance with the rule of law, including law that guarantees human rights. We will not provide direct or indirect support to public or private security forces that commit abuses described in paragraph 4 or that act illegally as described in paragraph 6.

9. **Regarding bribery and fraudulent misrepresentation of the origin of minerals:** We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of minerals, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of minerals.

10. **Regarding money laundering:** We will support and contribute to efforts to eliminate money laundering where we identify a reasonable risk resulting from, or connected to, the extraction, trade, handling, transport or export of minerals.

Addendum: Supply Chain Procedures.

Antwerp, December 15th 2021



Michel Fischler,
Managing Director FISCHLER DIAMONDS NV

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FISCHLER DIAMONDS NV Supply Chain Due Diligence Reporting

Preamble:

FISCHLER DIAMONDS NV has aligned its Supply Chain Due Diligence communication and reporting on RJC's Guidance for this subject (p. 65 of RJC COP 2019 Guidance Document, table 7.5.). As a result, this document recaps the reporting requirements for Tier 2 and downstream companies (FISCHLER DIAMONDS NV's position in the diamond supply chain).

Reporting:

1. Management Systems:

FISCHLER DIAMONDS NV has created a Supply Chain Policy document which will also be made available on the company's website. The Management responsibility for the due diligence programme has been assigned to FISCHLER DIAMONDS NV's Managing Director, and adequate record-keeping systems and processes for information collection have been installed as per the Company's procedures for this subject.

2. Risk Assessment:

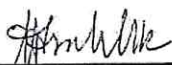
In preparation of its RJC Audit, FISCHLER DIAMONDS NV has engaged with all its suppliers by sending them its Supply Chain Policy and a Due Diligence Questionnaire, both accompanied by an explanatory letter on RJC's COP 7 and the Company's obligations in this respect. To date, the majority of suppliers have sent this questionnaire back, and the Company strives for 100% completion of supplier-response.

To date, no risks (neither actual or potential) have been identified, but the Company will strive to obtain more detailed information (whether in a formal or in an informal way) from their suppliers.

3. Response:

To date, no specific risks have been identified in our supply chain, as such, no specific extra steps needed to be undertaken by the Company to manage risks, monitor and track performance of risk mitigation or to follow up any specific risk-areas.

Antwerp, December 15th 2021



Michel Fischler,
Managing Director FISCHLER DIAMONDS NV

RJC Management Review Meeting

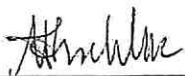
An annual management review meeting has been conducted at FISCHLER DIAMONDS NV on December 15th, 2021

The following points were reviewed:

1. There are no changes observed in the section 'General Requirements'.
2. All our Business Partners are screened with regards to AML legislation, Human Rights due diligence and Bribery issues and no major risks have been assessed.
3. We have implemented a Human Rights Due Diligence review and no adverse Human Rights impacts have been observed for the past year.
4. We have started to roll out our implementation of the COP7 standard in line with our policy and procedures.
5. No direct sourcing from artisanal and small-scale mining has occurred in the past year.
6. The security in our offices has been maintained at a satisfactory level and no security breaches have been observed.
7. We have completed out a process to obtain written assurances from all our suppliers concerning provenance claims.
8. No violations to labour rights and working conditions have been observed.
9. There have been no Health & Safety occurrences in the period under review.
10. No breach of product integrity has been observed and all procedures have been followed

No new risks have been identified.

Antwerp, December 15th 2021



Michel Fischler,
Managing Director FISCHLER DIAMONDS NV