

Responsible Jewellery Council Policy & Management Systems

0. PREAMBLE

H.D. Diam BV is a diamond trading company, operating from Antwerp, Belgium. H.D. Diam BV is a Certified Member of the Responsible Jewellery Council (RJC). The RJC is a standards-setting organisation that has been established to advance responsible ethical, human rights, social and environmental practices throughout the diamond, gold and platinum group metals jewellery supply chain. To that end, the RJC has developed a benchmark standard for the jewellery supply chain and credible mechanisms for verifying responsible business practices through third party auditing.

1. PURPOSE

The purpose of this policy is to ensure that H.D. Diam BV (and its various subsidiaries and entities, if applicable) demonstrates its commitment to the RJC Standards and to describe the management systems that will allow to maintain compliance with this policy.

2. POLICY:

As a Certified RJC Member, we commit to operating our business in accordance with the RJC Code of Practices, the specified standard being COP 2024. We commit to integrating ethical, human rights, product-related and social and environmental considerations into our day-to-day operations, business planning activities and decision-making processes.

This overarching policy will be supported by multiple, issue-specific policies to comply with different RJC Provisions, each of which can be found back in the Company's RJC document library.

3. SYSTEMS AND PROCEDURES

- Company specific policies and procedures on all COP Standards 1 to 30 will be reviewed on a yearly basis or when the need arises. Policies will be endorsed/signed by the management director and dated, the date of the policy meaning 'effective from' status. Changes in policy will be communicated to relevant personnel.
- The most relevant policies (COP2, COP6, COP7 and COP30) will be publicly available on the company's website, other policies may be available to various stakeholders upon specific request.
- An overarching Complaint & Grievance Policy with associated procedures will allow all stakeholders to express grievances and concerns, which will be dealt with as described under COP 2.6. of the COP 2024 Standard.

- H.D.Diam BV shall monitor and review the performance of the management systems and the complaints and grievance mechanism to determine if the system outcomes are successful. Where gaps are identified, corrective actions will be implemented.
- To this end, an annual review will be conducted to assess the ongoing suitability and adequacy of the company's business practices in achieving the policy, to identify any gaps and remediate accordingly.

4. RESPONSIBILITY FOR THE POLICY:

The authority and responsibility for this policy and company's compliance with all applicable requirements of the COP standard rests with the Managing Director of H.D.Diam BV.

Appropriate training on this policy and associated procedures will be foreseen for each relevant member of the staff of H.D.Diam BV, and records will be maintained covering all applicable requirements of the COP Standard, to be retained for a minimum of 5 years.

5. REPORTING & COMMUNICATION REQUIREMENTS:

Breaches of this policy will be reported to the CEO and will be part of the yearly review system.

Antwerp, (effective) March 16th, 2026



Mr. Dharmesh Patel,
CEO/Director H.D.Diam BV