



Addendum to the Supply Chain Policy:

Considerations:

H.D. DIAM BV considers its obligations towards COP7 as a process, which may need continuous monitoring over a longer period to achieve the best possible results, commensurate with the company's downstream position and size in the supply-chain.

The latter implies that information on supply-chains – especially beyond the first direct suppliers identifiable by H.D. DIAM BV - depends highly on the gracious cooperation of its suppliers. Considering the confidential nature of much of the information required from suppliers, some resistance to complete information-disclosure may be expected and must be incorporated in the process.

As such, we will strive to document the process to the best of our abilities and communicate whenever appropriate on progress.

Procedures:

In order to achieve full compliance with RJC COP 7, the following procedures will apply:

0) On a regular basis (at the minimum as part of the RJC recertification process) H.D. DIAM BV will review its Diamond Supply Chain Mapping to identify overall potential risks in its supply pipeline. Supporting the company's supply chain assessment may be findings from the yearly Human Rights Due Diligence exercise, KYC information, certified status of suppliers with credible standard organisations like RJC/DTC or similar and reports from credible human rights organisations.

The main determining factor for action based on our Supply Chain Due Diligence will however be the supplier's own assessment of his supply chain compliance obtained through the procedure detailed below.

1) H.D. DIAM BV will send a letter to all existing suppliers informing them about the Company's Supply Chain Policy under COP7. The letter is a clear invitation for cooperation to fulfil company's obligations.

2) The letter will contain the following 2 attachments:

- The Company's Supply Chain Policy
- The Company's information Form for Suppliers

Suppliers are kindly requested to fill in the Information form and to return it, signed and dated to DHARMESH PATEL;

3) If needed, the Company will follow up with a personal phone-call to check if the requirements are clear and to see how we can be of any assistance.

In any case, and within a period of 6 months after sending the policy and the Information request form, H.D. DIAM BV will put its best endeavours in obtaining a clear and timely answer from its suppliers.

4) After reception of the information questionnaire(s), H.D. DIAM BV will analyse the results and determine whether there are any issues in its supply-chain, and will take appropriate action, specifically when a 'red-flag' situation arises. (see point 5).

Appropriate action includes immediate disengagement as expressly specified under points 4 and 6 of our Policy; direct engagement with suppliers in case we believe we can be part of solving a supply chain risk or mitigation if possible. However, we believe that each specific situation (including red flag situations) will need specific monitoring and specific care, therefore there is no pre-determined list of outcomes for each situation.



5) 'Red Flag' situations may arise when we think suppliers (directly or indirectly) may have supplied us with diamonds from 'CAHRA's' as defined in the OECD Guidelines on Conflict Affected and High-Risk Areas.

In the absence of any clear, definite and regularly updated guidelines from either supranational or national instances (UN, EU, US) or sector-related instances who have the authority to deal with this issue (WDC, AWDC, WFDB), we define CAHRA's as those diamond-related countries and/or regions which are on the 'black list' of the Kimberley Process, in the actual case this concerns only certain regions from CAR (Central African Republic).

The company will align its criteria for defining CAHRA's if and when credible instances provide the necessary guidance.

6) For new suppliers, H.D. DIAM BV will implement step 1 to 4 at the start of the relationship, and will monitor the outcome as part of its global process.

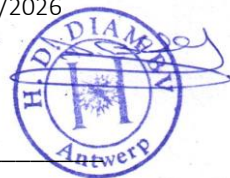
7) H.D. DIAM BV will keep records on each supplier with regards to COP7 and do regular checks on whether suppliers comply on an ongoing basis, a 3-yearly review will be installed as part of the RJC recertification process.

8) All elements gathered from the above will be summarised in a Supply Chain Risk Assessment document with following information and the influence of information on eventual rating:

- Name of Supplier
- Country of Supplier
- Country Rating (CPI, Transparency International, ratings below 30 to be examined).
- KYC information (received or not)
- RJC Member or assimilated information (RJC Members/DTC Sightholders automatically rated low)
- Supply Chain Due Diligence Form Sent/Received (if not received automatically rated medium)
- Red Flags on SCDD received (if yes, medium to high risk rating depending on severity of Red Flag). Engagement to follow in case of red flags or immediate disengagement.
- Final risk assessment
- Next steps/remarks (useful for continuous follow-up).

9) In its contacts with its customers, H.D. DIAM BV will also inform them about its Supply Chain Policy and the customer's ability to raise questions and grievances on this subject. A Grievance mechanism and form is already installed and will be reviewed on a yearly basis.

Antwerp, Belgium, 21/9/2026



Dharmesh Patel, Director
H.D. DIAM BV