HOUSSAM BV
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CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

Version 1.0 · 23 October 2026

1. PURPOSE AND SCOPE

Houssam BV is a Belgian diamond trading company based in Antwerp. This Corporate Social Responsibility (CSR) Policy sets out how Houssam BV conducts its business responsibly towards people, its business partners, society and the environment.

This Policy applies to all activities of Houssam BV, to its director and to any person acting on its behalf. Houssam BV also expects its suppliers, clients and service providers to uphold standards equivalent to those set out in this Policy, and where it becomes aware of a serious breach of these standards, it takes appropriate measures, up to the suspension or termination of the relationship.

2. OUR STANDARDS

Houssam BV has built its policies and business practices on internationally recognised standards for responsible business, including the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and the principles of the Responsible Jewellery Council (RJC) Code of Practices.

Houssam BV further respects the United Nations Guiding Principles on Business and Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, the Kimberley Process Certification Scheme (KPCS), the World Diamond Council (WDC) System of Warranties, and all applicable Belgian and European Union laws and regulations, including those on the prevention of money laundering and terrorist financing and on international sanctions.

3. HUMAN RIGHTS AND LABOUR

Houssam BV respects human rights and does not tolerate, in its own operations or in its supply chain, child labour, forced or compulsory labour, human trafficking, or any form of discrimination, harassment or abuse.

Where Houssam BV employs staff, it shall ensure fair and respectful treatment, safe working conditions, fair remuneration and working hours in accordance with Belgian law, and freedom of association.

4. RESPONSIBLE SOURCING AND SUPPLY CHAIN DUE DILIGENCE

Houssam BV sources diamonds only from legitimate sources and applies risk-based due diligence to its supply chain. In particular, Houssam BV:

(a) ensures that every natural diamond it trades is covered by the Kimberley Process Certification Scheme, where applicable, and by the WDC System of Warranties;

(b) does not trade in conflict diamonds, nor in diamonds whose sale contributes to serious human rights abuses, to the financing of armed groups, or to money laundering or terrorist financing;

(c) does not purchase, sell or facilitate trade in diamonds originating from, or exported from, any country or party subject to applicable sanctions, including diamonds of Russian origin, whether directly or through third countries;

(d) identifies and verifies every supplier and client before entering into a business relationship, and screens them against applicable sanctions lists, in accordance with its Anti-Money Laundering Policy;

(e) suspends or ends a business relationship where a serious risk of non-compliance with this Policy is identified and cannot be mitigated.

5. PRODUCT INTEGRITY AND DISCLOSURE

Houssam BV fully and accurately discloses the nature of every diamond it sells. Laboratory-grown (synthetic) diamonds and treated diamonds are always clearly identified as such, are never mixed with natural diamonds, and are invoiced separately, in accordance with applicable diamond nomenclature standards. Every diamond is examined by a certified diamond grader, using professional gemmological instruments and advanced diamond verification technology, and, where required, by independent, internationally recognised gemmological laboratories.

6. BUSINESS ETHICS AND INTEGRITY

Houssam BV conducts its business with honesty and integrity. It does not offer, give, request or accept bribes or any other improper advantage. It complies with anti-money laundering, counter-terrorist financing and sanctions legislation, competes fairly, keeps accurate business records, and protects the confidentiality of its business partners' information and the personal data entrusted to it, in accordance with its Privacy & Cookie Policy.

7. HEALTH, SAFETY AND SECURITY

Houssam BV protects the health and safety of every person involved in its activities. Diamonds are stored and transported securely, and shipments are made through licensed and secure logistics providers.

8. ENVIRONMENT

As an office-based trading company, Houssam BV has a limited environmental footprint. It nevertheless seeks to reduce its impact, in particular by favouring digital records over paper, by consolidating shipments where possible, and by disposing of waste responsibly.

9. GRIEVANCES AND REPORTING CONCERNS

Any person, inside or outside Houssam BV, may raise a concern about a possible breach of this Policy, including concerns relating to the supply chain or to the disclosure of diamonds, by writing to compliance@houssamdiamonds.com. Every concern is treated confidentially and examined promptly. Houssam BV does not tolerate any retaliation against a person who raises a concern in good faith, even if the concern later proves to be unfounded. Concerns are handled in accordance with the Whistleblowing and Grievance Policy of Houssam BV.

10. RESPONSIBILITY, REVIEW AND COMMUNICATION

The Managing Director of Houssam BV is responsible for the implementation of this Policy. This Policy is reviewed at least once a year, and whenever the activities of Houssam BV or the applicable standards change materially. It is published on the website of Houssam BV and communicated to its business partners upon request.

Approved by: Houssam Aldeen Najjar · Founder & Managing Director · Antwerp, 23 October 2026