HOUSSAM BV
Kernenergiestraat 19, 2610 Antwerp, Belgium · VAT BE1023621402 · www.houssamdiamonds.com

HUMAN RIGHTS POLICY

Version 1.0 · 28 October 2026

1. PURPOSE AND SCOPE

Houssam BV is a Belgian diamond trading company based in Antwerp. Houssam BV respects the fundamental rights and freedoms of every person, and is committed to ensuring that its activities neither cause nor contribute to human rights abuses. This Human Rights Policy sets out that commitment and how Houssam BV puts it into practice.

This Policy applies to all activities of Houssam BV, to its director and to any person acting on its behalf. It also sets out what Houssam BV expects of its suppliers, clients and service providers.

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 Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, the Charter of Fundamental Rights of the European Union, and all applicable Belgian and European Union laws.

3. OUR PEOPLE

Houssam BV treats every person with dignity and respect. Where Houssam BV employs staff, it:

(a) never employs any person below the legal minimum working age;

(b) never uses forced, compulsory or bonded labour, and never retains identity documents or wages as a means of control;

(c) does not tolerate discrimination on the basis of age, gender, origin, nationality, religion or belief, disability, sexual orientation or any other protected characteristic, in recruitment, remuneration, training, promotion or dismissal;

(d) provides remuneration, benefits, working hours and rest periods in accordance with Belgian law and the applicable collective agreements;

(e) respects freedom of association and the right to collective bargaining;

(f) provides a safe and healthy workplace, free from violence and harassment, in accordance with its Workplace Violence and Harassment Policy.

4. OUR SUPPLY CHAIN

Houssam BV applies risk-based due diligence to its supply chain, in accordance with its Responsible Sourcing Policy and its Supply Chain Policy. It does not tolerate, nor profit from, contribute to or facilitate, serious human rights abuses, including forced labour, the worst forms of child labour, torture or cruel, inhuman or degrading treatment, widespread sexual violence, war crimes, crimes against humanity or genocide. Where Houssam BV identifies a reasonable risk that a supplier is linked to such abuses, it immediately suspends or discontinues engagement with that supplier.

Houssam BV expects its suppliers to respect human rights in their own operations and supply chains, and its supplier contracts include their undertaking to apply equivalent standards.

5. OUR CLIENTS AND BUSINESS PARTNERS

Houssam BV builds relationships with clients, service providers and business partners that share its commitment to human rights. Where Houssam BV becomes aware that a business partner is involved in a serious breach of human rights, it takes appropriate measures, up to the suspension or termination of the relationship.

6. PRIVACY

Houssam BV respects the right to privacy of every person whose personal data it processes, and processes such data lawfully, securely and only for legitimate purposes, in accordance with its Privacy & Cookie Policy.

7. RAISING CONCERNS

Any person, inside or outside Houssam BV, may raise a concern about a possible human rights abuse linked to its activities or its supply chain by writing to compliance@houssamdiamonds.com. Every concern is treated confidentially and examined promptly, and Houssam BV does not tolerate any retaliation against a person who raises a concern in good faith. Concerns are handled in accordance with the Whistleblowing and Grievance Policy of Houssam BV.

8. RESPONSIBILITY AND REVIEW

The Managing Director of Houssam BV is responsible for the implementation of this Policy. This Policy should be read together with the Corporate Social Responsibility (CSR) Policy, the Responsible Sourcing Policy, the Supply Chain Policy and the Workplace Violence and Harassment Policy of Houssam BV. It is reviewed at least once a year, and whenever the activities of Houssam BV or the applicable standards change materially, and it is published on the website of Houssam BV.

Approved by: Houssam Aldeen Najjar · Founder & Managing Director · Antwerp, 28 October 2026