HOUSSAM BV
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KNOW YOUR COUNTERPARTY (KYC) POLICY

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1. PURPOSE AND SCOPE

Houssam BV is a Belgian diamond trading company based in Antwerp, registered with the Federal Public Service Economy. This Policy sets out how Houssam BV identifies and verifies its clients and suppliers and assesses the related risks, so that its business is never used for money laundering, terrorist financing, sanctions evasion or any other illegal activity. It applies to every client and supplier, including counterparties to whom goods are entrusted on consignment, and summarises the Anti-Money Laundering Policy of Houssam BV, based on the Belgian Law of 18 September 2017 on the prevention of money laundering and terrorist financing and the guidance of the Antwerp World Diamond Centre (AWDC).

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.

2. IDENTIFICATION AND VERIFICATION

Before entering into a business relationship or carrying out an occasional transaction, Houssam BV identifies and verifies the counterparty, its legal representatives and its ultimate beneficial owners, on the basis of official register extracts, identity documents and the applicable beneficial ownership registers. It also verifies the registration of Belgian diamond traders with the Federal Public Service Economy and the VAT number of counterparties established elsewhere in the European Union. This information is collected through the AWDC Know Your Customer documentation and managed on the KYC platform of the AWDC.

3. RISK ASSESSMENT AND SCREENING

Houssam BV seeks to understand the purpose and nature of every business relationship and, where necessary, the source of funds, and assesses the risk of each counterparty on the basis of recognised indicators, including the lists of the Financial Action Task Force (FATF) and of the European Union. Every counterparty, its representatives and its ultimate beneficial owners are screened against applicable sanctions lists, and for politically exposed persons and adverse media, at every transaction, and a dated record is kept of every screening. Where the risk is higher, Houssam BV applies enhanced due diligence, including approval at the highest level of the company and verification of the source of funds.

4. ACCEPTANCE AND REFUSAL

Every decision to accept or refuse a counterparty is documented. Houssam BV does not enter into, or terminates, any relationship where the counterparty refuses to be identified or provides unreliable information, is subject to sanctions, is a Belgian diamond trader not registered with the Federal Public Service Economy, or presents a risk that cannot be mitigated to an acceptable level.

5. PAYMENTS

All payments are made and received in full compliance with the applicable legal and regulatory framework, including the Belgian Law of 18 September 2017 on the prevention of money laundering and terrorist financing, the anti-money laundering and sanctions legislation of the European Union, the Recommendations of the Financial Action Task Force (FATF), the sanctions of the United Nations and, for transactions settled in United States dollars, the sanctions administered by the Office of Foreign Assets Control (OFAC) of the United States, as well as the AWDC Best Practice Guide for trade in the Belgian

diamond sector. Payments are made through regulated financial channels, such as bank transfers or the services of other licensed providers. Houssam BV does not accept payments from unrelated third parties.

6. ONGOING MONITORING AND UPDATES

Houssam BV monitors its business relationships on an ongoing basis and examines any transaction that is complex, unusually large, unusual in pattern or without an apparent economic purpose. It updates the information on its counterparties at least every year for higher-risk counterparties and at least every three (3) years for all others, and whenever their circumstances change. Any suspicion of money laundering or terrorist financing is reported to the Belgian Financial Intelligence Processing Unit (CTIF-CFI), in accordance with the law.

7. DATA PROTECTION AND RECORD KEEPING

Information collected under this Policy is used solely to meet the legal obligations of Houssam BV, in accordance with its Privacy & Cookie Policy, and is kept for ten (10) years after the end of the business relationship or of the occasional transaction.

8. RESPONSIBILITY AND REVIEW

The Anti-Money Laundering (AML) Compliance Officer of Houssam BV is responsible for the application of this Policy and holds at all times a valid anti-money laundering certification, obtained through the annual certification organised by the AWDC and the Federal Public Service Economy, or through the official AML exam, which grants a multi-year exemption. Where Houssam BV employs staff, every employee involved in client or supplier relationships receives training on this Policy upon appointment and regularly thereafter. This Policy is reviewed at least once a year, and whenever the applicable legislation changes materially, and it is published on the website of Houssam BV.

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