HOUSSAM BV
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RESPONSIBLE BUSINESS POLICY

Version 1.0 · 24 October 2026

1. PURPOSE

Houssam BV is a Belgian diamond trading company based in Antwerp. Integrity, transparency and compliance are the foundation on which Houssam BV builds lasting relationships of trust with its suppliers, clients, the authorities and the wider diamond community. This Responsible Business Policy sets out the principles that guide every decision and every transaction of Houssam BV, and applies to its director and to any person acting on its behalf.

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. OUR PRINCIPLES

2.1. Respect for human rights. Houssam BV supports the Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights. It treats every person with dignity and respect, and does not tolerate discrimination, harassment or abuse of any kind. Where Houssam BV employs staff, it provides a fair, transparent and inclusive workplace that supports their development.

2.2. Safety and security. The safety of people always comes before the protection of goods. Diamonds are stored and transported securely, shipments are made through licensed and secure logistics providers, and confidential business information is protected against unauthorised access.

2.3. Ethics and integrity. Houssam BV conducts its business honestly, fairly and lawfully. In particular, it:

(a) does not offer, give, request or accept bribes, facilitation payments or any other improper advantage;

(b) accepts or offers gifts and hospitality only where they are modest, occasional, transparent and never intended to influence a business decision;

(c) avoids conflicts of interest, and discloses and manages any situation in which a personal interest could conflict with the interests of Houssam BV;

(d) competes fairly, and never enters into agreements that restrict competition;

(e) keeps complete and accurate business and accounting records, and meets all its tax and reporting obligations in full and on time.

2.4. Know your counterparty. Houssam BV identifies and verifies every supplier and client, including their ultimate beneficial owners, and screens them against applicable sanctions lists before entering into a business relationship and at every transaction, in accordance with its Anti-Money Laundering Policy. It thereby prevents its business from being used for money laundering, terrorist financing, sanctions evasion or any other illegal activity.

2.5. Product disclosure and integrity. Houssam BV provides every buyer with complete and accurate information on the diamonds it sells, including, as applicable, carat weight, colour, clarity, cut and any grading report. Laboratory-grown and treated diamonds are always clearly disclosed, are never mixed with natural diamonds, and are invoiced separately. Every diamond is examined by a certified diamond grader, using professional gemmological instruments and advanced diamond verification technology, and every invoice for natural diamonds carries the World Diamond Council (WDC) System of Warranties statement, ensuring the traceability of the information disclosed to clients.

2.6. Confidentiality and data protection. Houssam BV protects the confidentiality of the commercial information entrusted to it by its business partners, and processes personal data lawfully, securely and only for legitimate purposes, in accordance with its Privacy & Cookie Policy.

2.7. Sustainable value creation. Houssam BV seeks to create long-term value for its clients, suppliers and business partners through fair dealing, reliability and quality, and contributes to the reputation of Antwerp as a trusted centre of the diamond trade.

2.8. Respect for the environment. Houssam BV seeks to minimise the environmental impact of its activities, in particular by favouring digital records over paper, by consolidating shipments where possible and by disposing of waste responsibly, and it continuously looks for ways to improve.

2.9. Engagement with the diamond community. Houssam BV maintains an open and honest dialogue with its business partners and the authorities, takes part in the training and information initiatives of the Antwerp diamond sector, and remains responsive to any concern raised about its activities.

3. INTEGRATION, MONITORING AND REPORTING

These principles are integrated into the daily operations, risk management and decision-making of Houssam BV, through its written procedures and checklists. Houssam BV reviews its performance against this Policy at least once a year, and meets its statutory reporting obligations, including its annual anti-money laundering report to the Federal Public Service Economy.

4. TRAINING

The Anti-Money Laundering (AML) Compliance Officer of Houssam BV holds at all times a valid anti-money laundering certification, obtained through the annual certification organised by the Antwerp World Diamond Centre (AWDC) and the Federal Public Service Economy, or through the official AML exam, which grants a multi-year exemption, regularly follows training on responsible business, and keeps records of all training and certificates. Where Houssam BV employs staff, every employee receives training on this Policy upon appointment and regularly thereafter.

5. REPORTING CONCERNS

Any person, inside or outside Houssam BV, may raise a concern about a possible breach of this Policy 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.

6. RELATED POLICIES, REVIEW AND RESPONSIBILITY

This Policy should be read together with the Corporate Social Responsibility (CSR) Policy, the Responsible Sourcing Policy, the Supply Chain Policy and the Anti-Money Laundering 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. The Managing Director of Houssam BV is responsible for its implementation.

Approved by: Houssam Aldeen Najjar · Founder & Managing Director · Antwerp, 24 October 2026