HOUSSAM BV
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RESPONSIBLE SOURCING POLICY

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1. PURPOSE AND SCOPE

Houssam BV is a Belgian diamond trading company based in Antwerp. This Responsible Sourcing Policy sets out how Houssam BV ensures that the diamonds it buys and sells do not contribute to conflict, serious human rights abuses, money laundering or terrorist financing.

This Policy applies to all purchases and sales of Houssam BV worldwide, covering natural diamonds, laboratory-grown diamonds and coloured gemstones. It applies to the director of Houssam BV and to any person acting on its behalf, and Houssam BV expects its suppliers and service providers to apply equivalent standards.

2. OUR COMMITMENT

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 respects human rights, does not contribute to the financing of conflict, and complies with all applicable laws, United Nations sanctions and international conventions. In proportion to its size and position in the supply chain, Houssam BV applies the five-step framework of the OECD Due Diligence Guidance:

(a) maintaining strong management systems for supply chain due diligence;

(b) identifying and assessing risks in its supply chain, including the possible sourcing of diamonds from conflict-affected and high-risk areas;

(c) responding to identified risks through a documented risk management strategy;

(d) relying on, and supporting, independent verification of due diligence practices at identified points of the supply chain;

(e) reporting on its supply chain due diligence through its published policies and its statutory reporting to the competent authorities.

3. SERIOUS ABUSES

Houssam BV shall neither tolerate nor profit from, contribute to, assist with or facilitate the commission by any party of: torture or cruel, inhuman or degrading treatment; forced or compulsory labour; the worst forms of child labour; other gross human rights violations and abuses, such as widespread sexual violence; or war crimes, crimes against humanity or genocide.

Where Houssam BV identifies a reasonable risk that a supplier is sourcing from, or is linked to, any party committing such abuses, it shall immediately suspend or discontinue engagement with that supplier.

4. NON-STATE ARMED GROUPS

Houssam BV shall not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of diamonds. Where Houssam BV identifies a reasonable risk that a supplier is sourcing from, or is linked to, any party providing such support, it shall immediately suspend or discontinue engagement with that supplier.

5. PUBLIC OR PRIVATE SECURITY FORCES

Houssam BV shall not provide direct or indirect support to public or private security forces that illegally control mine sites, transport routes or upstream actors in the supply chain, or that illegally tax or extort money or minerals. Where Houssam BV contracts security services, such as for the secure transport of goods, it shall do so only with licensed and reputable providers, and expects them to respect human rights in line with the Voluntary Principles on Security and Human Rights. Where Houssam BV becomes aware that such a provider has violated these principles, it takes appropriate measures, up to the suspension or termination of the relationship.

6. BRIBERY AND FRAUDULENT MISREPRESENTATION OF ORIGIN

Houssam BV shall not offer, promise, give or demand any bribe, and shall resist any request for a bribe, to conceal or disguise the origin of diamonds, or to misrepresent taxes, fees and royalties paid to governments for the extraction, trade, handling, transport or export of diamonds.

7. MONEY LAUNDERING AND TERRORIST FINANCING

Houssam BV supports, and contributes to, efforts to eliminate money laundering and terrorist financing. It identifies and verifies every supplier and client, including their ultimate beneficial owners, screens them against applicable sanctions lists, and reports suspicious transactions to the competent authorities, under the supervision of its AML Compliance Officer, in accordance with the Belgian Law of 18 September 2017 on the prevention of money laundering and terrorist financing and its Anti-Money Laundering Policy.

8. TAXES, FEES AND ROYALTIES

Houssam BV supports the payment of all taxes, fees and royalties due to governments for the extraction, trade and export of diamonds, and supports transparency of such payments in line with the principles of the Extractive Industries Transparency Initiative (EITI), in accordance with its position in the supply chain.

9. RISK MANAGEMENT

For the risks described in Sections 3 and 4, Houssam BV immediately suspends or discontinues engagement with the supplier concerned.

For the risks described in Sections 5 to 8, Houssam BV adopts a risk management plan with the supplier concerned, aimed at measurable improvement. Where such improvement is not achieved within six (6) months of the adoption of the plan, Houssam BV suspends or discontinues engagement with that supplier.

10. DIAMONDS

Every natural diamond that Houssam BV buys or sells complies with the Kimberley Process Certification Scheme, where applicable, and with the World Diamond Council (WDC) System of Warranties. Houssam BV requires the System of Warranties statement on every supplier invoice for natural diamonds and includes it on its own invoices for natural diamonds.

Houssam BV does not purchase, sell or facilitate trade in diamonds originating from, or exported from, the Russian Federation, whether directly or through third countries, and complies with all applicable European Union and international measures on diamond origin, including the required declarations and evidence of origin on import.

Laboratory-grown diamonds and treated diamonds are always clearly disclosed as such, are never mixed with natural diamonds, and are invoiced separately.

11. COLOURED GEMSTONES

Houssam BV applies risk-based due diligence to coloured gemstones in line with the OECD Due Diligence Guidance, and requires its coloured gemstone suppliers to apply equivalent standards. Treated coloured gemstones are always clearly disclosed as such.

12. TRAINING AND AWARENESS

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, and regularly follows training on responsible sourcing. Where Houssam BV employs staff, every employee receives training on this Policy and on the anti-money laundering obligations of Houssam BV upon appointment and regularly thereafter. Records of all training are kept.

13. GRIEVANCES AND REPORTING CONCERNS

Any person, inside or outside Houssam BV, may raise a concern about the supply chain, the origin of diamonds or a possible breach of this Policy by writing to compliance@houssamdiamonds.com. Every concern is treated confidentially and examined promptly. Any attempt to prevent or suppress a concern is a breach of this Policy, and 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.

14. RELATED POLICIES AND REFERENCES

This Policy should be read together with the Anti-Money Laundering Policy and the Corporate Social Responsibility (CSR) Policy of Houssam BV. External references: the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas; the RJC Code of Practices; the Kimberley Process Certification Scheme; and the WDC System of Warranties Guidelines.

15. COMMUNICATION, REVIEW AND RESPONSIBILITY

This Policy is communicated to the suppliers of Houssam BV and is publicly available on its website. 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