WHISTLEBLOWING AND GRIEVANCE POLICY

Version 1.0 · 28 October 2026

1. PURPOSE

Houssam BV is committed to conducting its business with integrity, transparency and full respect for the law. This Whistleblowing and Grievance Policy enables any person to report, safely and in confidence, a possible breach connected with the activities of Houssam BV, and to raise a grievance, a complaint or a request for information about its activities or its supply chain, including concerns relating to human rights and responsible sourcing. It protects every person who does so in good faith, and serves as the complaints and grievance mechanism of Houssam BV.

This Policy is based on Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law, and on the Belgian Law of 28 November 2022 on the protection of persons who report breaches of Union or national law within a legal entity in the private sector.

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. WHO MAY REPORT

Any person who has obtained information about a possible breach in a work-related context may report it, including the director of Houssam BV, any employee, trainee or self-employed person working with it, job applicants, and any supplier, client, service provider or business partner, as well as their staff.

3. WHAT MAY BE REPORTED

Any actual or suspected breach of the law or of the policies of Houssam BV, in particular concerning:

(a) money laundering, terrorist financing and international sanctions;

(b) fraud, bribery, corruption and tax offences;

(c) the origin, nature or disclosure of diamonds and coloured gemstones, including the misrepresentation of laboratory-grown or treated stones;

(d) human rights, labour conditions and responsible sourcing in the supply chain;

(e) the protection of personal data and the security of information systems;

(f) fair competition, and health and safety at work.

4. HOW TO REPORT

Reports may be made in writing to compliance@houssamdiamonds.com, or, on request, in a meeting within a reasonable period. A report may be made anonymously. It should describe the facts as precisely as possible, and include any supporting information available.

Houssam BV acknowledges receipt of every report within seven (7) days, examines it diligently, impartially and transparently, and informs the reporting person of the action taken within three (3) months of that acknowledgment. A confidential record is kept of every report, including where anonymity has been requested.

5. EXTERNAL REPORTING

Any person may also report directly to the competent authorities, including the Federal Ombudsman, which acts as federal coordinator for external reports, and the Federal Public Service Economy, which supervises the Belgian diamond sector. Where a report concerns the Managing Director, the reporting person is encouraged to use these external channels. This Policy does not affect the right of any person to use administrative, judicial or other external remedies.

6. CONFIDENTIALITY AND DATA PROTECTION

The identity of the reporting person, and any information from which it could be deduced, is never disclosed without that person's explicit consent, except where required by law. The persons concerned by a report are protected in the same way. Personal data relating to a report is processed only for the purpose of handling it, in accordance with the Privacy & Cookie Policy of Houssam BV and the applicable law.

7. PROTECTION AGAINST RETALIATION

Houssam BV does not tolerate any form of retaliation, including dismissal, demotion, intimidation, termination of a contract or loss of business, or any threat of it, against a person who reports in good faith, even if the report later proves to be unfounded, nor against any person who assists or is connected with that person. Knowingly false reports are not protected.

8. RESPONSIBILITY AND REVIEW

The Managing Director of Houssam BV is responsible for the implementation of this Policy and for the handling of reports, independently and free from any conflict of interest. This Policy should be read together with the Corporate Social Responsibility (CSR) Policy, the Human Rights Policy and the Know Your Counterparty (KYC) Policy of Houssam BV. It 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