WORKPLACE VIOLENCE AND HARASSMENT POLICY

Version 1.0 · 26 October 2026

1. PURPOSE

Houssam BV is committed to a workplace and a business environment in which every person is treated with dignity and respect and can work in safety. Houssam BV does not tolerate violence or harassment of any kind, in any form, by or against any person involved in its activities.

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. This Policy also gives effect to the Belgian Law of 4 August 1996 on the well-being of workers in the performance of their work and its provisions on psychosocial risks.

2. SCOPE

This Policy applies to the director of Houssam BV, to any employee, temporary worker or trainee, and to every person who interacts with Houssam BV in the course of its activities, including clients, suppliers, service providers and visitors. It applies at the premises of Houssam BV, at meeting places, at trade fairs, during business travel and in all communications, whether in person, by telephone, by e-mail or through any other channel.

3. DEFINITIONS

Violence means any situation in which a person is threatened or physically or psychologically attacked in the course of work. It includes, in particular, threats, intimidation or insults directed at a person, any physical aggression, and any damage to or destruction of property caused through aggressive behaviour.

An isolated, spontaneous expression of frustration, such as a gesture, that is not directed at any person, does not threaten anyone and causes no damage, does not in itself constitute violence under this Policy. Repeated conduct, or conduct that a reasonable person would perceive as threatening, is always covered.

Harassment means any unwanted, abusive conduct, repeated or not, that has the purpose or effect of violating a person’s dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment, including conduct related to age, gender, origin, nationality, religion or belief, disability, sexual orientation or any other protected characteristic.

Sexual harassment means any unwanted verbal, non-verbal or physical conduct of a sexual nature that has the purpose or effect of violating a person’s dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment.

4. OUR COMMITMENTS

Houssam BV:

(a) prohibits violence, harassment and sexual harassment, and takes every allegation seriously;

(b) prevents and manages risks, including the specific security risks of the diamond trade, by meeting business partners in secure, professional settings, such as business offices, diamond bourses, trade fairs or other secure premises suited to the purpose, and by ensuring that diamonds are stored and transported securely, so that the safety of people always comes before the protection of goods;

(c) treats every person fairly and without discrimination, and expects its business partners to do the same in their dealings with Houssam BV;

(d) where Houssam BV employs staff, is affiliated, as required by Belgian law, with an external service for prevention and protection at work, which provides a prevention advisor for psychosocial aspects, and informs every employee of the procedures available to them.

5. REPORTING AND INVESTIGATION

Any person who experiences or witnesses violence or harassment in connection with the activities of Houssam BV may report it to the Managing Director or by writing to compliance@houssamdiamonds.com. Where Houssam BV employs staff, employees may also turn directly, and in confidence, to the prevention advisor for psychosocial aspects.

Every report is examined promptly, objectively and confidentially, on the basis of the facts and their context. The persons concerned are heard, and appropriate measures are taken to stop the conduct, to protect the person affected and to prevent any recurrence.

6. MEASURES AND SANCTIONS

Any breach of this Policy leads to appropriate measures. In the case of an employee, these may include disciplinary measures up to and including dismissal. In the case of a business partner, Houssam BV may suspend or terminate the business relationship. Where the conduct constitutes a criminal offence, Houssam BV may report it to the competent authorities.

7. PROTECTION AGAINST RETALIATION

Houssam BV does not tolerate any retaliation, or threat of retaliation, against a person who reports violence or harassment in good faith or who takes part in an investigation, even if the report later proves to be unfounded.

8. AWARENESS AND REVIEW

Where Houssam BV employs staff, every employee is informed of this Policy upon appointment, and again whenever it changes materially. This Policy is reviewed at least once a year, and whenever the activities of Houssam BV or the applicable legislation change materially. The Managing Director of Houssam BV is responsible for its implementation.

Approved by: Houssam Aldeen Najjar · Founder & Managing Director · Antwerp, 26 October 2026