ANTWERP CUT
FOR COLOUR

ANTWERP CUT BV Supply chain policy

1. ANTWERP CUT BV is a diamond trading company. This policy confirms ANTWERP CUT BV's commitment to respect human rights, avoid contributing to the finance of conflict and comply with all relevant UN sanctions, resolutions and laws. The same policy applies to the company's subsidiary, ANTWERP CUT HK Ltd.

2. ANTWERP CUT BV is a Certified Member of the Responsible Jewellery Council (RJC). As such, we commit to proving, through independent third-party verification, that we:

a. respect human rights according to the Universal Declaration of Human Rights and International Labour Organization Declaration on Fundamental Principles and Rights at Work (See COP 6);

b. do not engage in or tolerate bribery, corruption, money laundering or finance of terrorism (See COP 12);

c. support transparency of government payments and rights-compatible security forces in the extractives industry;

d. do not provide direct or indirect support to illegal armed groups (See COP 29);

e. enable stakeholders to voice concerns about the jewellery supply chain; and

f. are implementing the OECD five-step framework as a management process for risk-based due diligence for responsible supply chains of minerals from conflict-affected and high-risk areas (See COP 7).
This process will be led by the Company's Managing Director, who will provide the necessary resources and manpower to create sustainable management systems that will allow the Company to implement the OECD framework in a time-frame consistent with the RJC timelines foreseen for the COP7 standard.

3. We also commit to using our influence to prevent abuses by others. We will inform our suppliers of the existing policy in a structured way and attract their attention specifically to article # 5 & 7 of this policy, which may imply direct termination of our commercial relationships with them.

We will also inform our customers of our policy and ask them to be vigilant and to report any possible abuses they might come across in the supply chain where we might be concerned.

4. Regarding serious abuses associated with the extraction, transport or trade of minerals: We will neither tolerate nor profit from, contribute to, assist or facilitate the commission of:

a. torture, cruel, inhuman and degrading treatment;
b. forced or compulsory labour (See COP 20);
c. the worst forms of child labour (See COP 19);

d. human rights violations and abuses (See COP 6); or
e. war crimes, violations of international humanitarian law, crimes against humanity or genocide (See COP 29).

5. We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are committing abuses described in paragraph 4 or are sourcing from, or linked to, any party committing these abuses.

6. Regarding direct or indirect support to non-state armed groups: We only buy or sell products that are fully compliant with the Kimberley Process Certification Scheme and, as such, will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring diamonds from, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates who illegally:

a. control mine sites, transportation routes, points where diamonds are traded and upstream actors in the supply chain; or

b. tax or extort money or diamonds at mine sites, along transportation routes or at points where diamonds are traded, or from intermediaries, export companies or international traders.

7. We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are sourcing from, or are linked to, any party providing direct or indirect support to non-state armed groups as described in paragraph 6.

8. Regarding public or private security forces: We affirm that the role of public or private security forces is to provide security to workers, facilities, equipment and property in accordance with the rule of law, including law that guarantees human rights. We will not provide direct or indirect support to public or private security forces that commit abuses described in paragraph 4 or that act illegally as described in paragraph 6.

9. Regarding bribery and fraudulent misrepresentation of the origin of minerals: We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of minerals, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of minerals.

10. Regarding money laundering: We will support and contribute to efforts to eliminate money laundering where we identify a reasonable risk resulting from, or connected to, the extraction, trade, handling, transport or export of minerals.

Addendum: Supply Chain Procedures.

Antwerp, (effective from) March 1st 2026

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Mike Akiki,

Managing Director ANTWERP CUT BV