HB TRADING
— ANTWERP —

HB TRADING BV Supply Chain Policy

1. HB TRADING BV is a diamond trading company. This policy confirms HB TRADING BV's commitment to respect human rights, avoid contributing to the finance of conflict and comply with all relevant UN sanctions, resolutions and laws.

2. HB TRADING 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 CEO, 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 articles # 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.

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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.

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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 April 14th, 2021

Boaz Lev,
Managing Partner

HB TRADING
— ANTWERP —

Addendum to the Supply Chain Policy : Procedures

Considerations:

HB TRADING BV considers its obligations towards COP7 as a process, which may need continuous monitoring over a longer period to achieve the best possible results, commensurate with the company's downstream position and size in the supply-chain.

The latter implies that information on supply-chains – especially beyond the first direct suppliers identifiable by HB TRADING BV - depends highly on the gracious cooperation of its suppliers. Considering the confidential nature of much of the information required from suppliers, some resistance to complete information-disclosure may be expected and must be incorporated in the process.

As such, we will strive to document the process to the best of our abilities and communicate whenever appropriate on progress.

Procedures:

In order to achieve full compliance with RJC COP 7, the following procedures will apply:

1) HB TRADING BV will send a letter to all existing suppliers informing them about the Company's Supply Chain Policy under COP7. The letter is a clear invitation for cooperation to fulfil HB TRADING BV's obligations.

2) The letter will contain the following 2 attachments:

- The Company's Supply Chain Policy
- The Company's information Form for Suppliers

Suppliers are kindly requested to fill in the Information form and to return it, signed and dated to HB TRADING BV.

3) If needed, the Company will follow up with a personal phone-call to check if the requirements are clear and to see how we can be of any assistance.

In any case, and within a period of 6 months after sending the policy and the Information request form, HB TRADING BV will put its best endeavours in
obtaining a clear and timely answer from its suppliers.

4) After reception of the information questionnaire(s), HB TRADING BV will analyse the results and determine whether there are any issues in its supply-chain, and will take appropriate action, specifically when a 'red-flag' situation may arise.

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5) For new suppliers, HB TRADING BV will implement step 1 to 4 at the start of the relationship, and will monitor the outcome as part of its global process.

6) HB TRADING BV will keep records on each supplier with regards to COP7 and do regular checks on whether suppliers comply on an ongoing basis.

7) In its contacts with its customers, HB TRADING BV will also inform them about its Supply Chain Policy and the customer's ability to raise questions and grievances on this subject. A Grievance mechanism and form is already installed and will be reviewed on a yearly basis.

Antwerp April 14th, 2021

Boaz Lev,
Managing Partner

HB MANUFACTURING
— ANTWERP —

HB MANUFACTURING BV Supply Chain Policy

1. HB MANUFACTURING BV is a diamond trading company. This policy confirms HB MANUFACTURING NV's commitment to respect human rights, avoid contributing to the finance of conflict and comply with all relevant UN sanctions, resolutions and laws.

2. HB MANUFACTURING BV is a certified member of the Responsible Jewellery Council (RJC). As such, we commit to proving, through independent third-party verification, that we:

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Addendum: Supply Chain Procedures.

Antwerp, March 15th 2022

Boaz Lev,
Managing Partner

HB MANUFACTURING
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Antwerp, March 15th 2022

Boaz Lev,
Managing Partner