

Policy Statement of Supply Chain

1. Windiam NV is a Belgian Diamonds Company active in the diamond industry since 1991. This policy confirms Windiam's commitment to respect human rights, avoid contributing to the finance of conflict and comply with all relevant UN sanctions, resolutions and laws.

2. Windiam NV 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 ;
- b. do not engage in or tolerate bribery, corruption, money laundering or finance terrorism;
- 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;
- e. enable stakeholders to voice concerns about the 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. This process will be led by the Company's CEO, who will provide the necessary resources and manpower to create sustainable management systems that allow Windiam to implement the OECD framework in a time-frame consistent with the RJC timelines foreseen for the COP7 standards.

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 relationship 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 extraction, transport or trade of diamonds or 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;
- c. the worst forms of child labour;
- d. human rights violations and abuses; or
- e. war crimes, violations of international humanitarian law, crimes against humanity or genocide.

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 Kimberly Process Certification Scheme and, as such, we 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 diamonds or minerals: We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of diamonds, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of diamonds.

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 diamonds or minerals.

Windiam NV shall ensure that all of its respective activities are in line with the OECD Due Diligence Guidelines and the Responsible Jewellery Council Standards.

The Company shall purchase/Sale diamonds that are fully compliant with Kimberly Process Certification Scheme (KPCS)

Counterparty details shall be verified, including the Know Your Customer (KYC) for any diamonds supplying counterparties at regular interval.

The company shall carry out risk assessments for its supply chain and shall not enter into any business relationship with such supplier involved in dealing with Conflict-Affected and High Risk areas or committing abuses described in paragraph 4

Relevant Employees shall be trained on the Supply Chain & Due Diligence Requirements and OECD guidelines at regular interval.

Grievance Mechanism

The purpose of this document is to outline a process through which any stakeholder can understand due diligence and supply chain integrity policy of our organization. The identity of the person who is ever has registered a concern shall be kept confidential and no retaliatory actions shall be taken against any whistle blower.

For anonymous submissions, you may refrain to provide your contact information.

Please feel free to share your Complaint or Grievance to : gon@windiam.net

Gon RAZ, Director, Windiam N.V.



Date of effect: 1st of October 2020