

WINDIAM NV Human Rights Due Diligence Reporting

Preamble:

WINDIAM NV has aligned its Human Rights Due Diligence communication and reporting on RJC's Guidance for this subject. As a result, this document recaps the reporting requirements for Tier 2 and downstream companies (WINDIAM NV's position in the diamond supply chain).

Reporting:

1. Management Systems:

WINDIAM NV has adopted a Human Rights Policy document outlining its commitment to ensure that fundamental human rights and the dignity of the individual are respected at all times, based on the UN Guiding Principles on Business and Human Rights as well as on the UN Universal Declaration of Human Rights. The Human Rights Policy is complemented by WINDIAM'S Supply Chain Policy which addresses many HR issues.

The Management responsibility for HR due diligence programme has been assigned to WINDIAM NV's Managing Director, and adequate record-keeping systems and processes for information collection have been installed as per the Company's procedures for this subject. Information on this subject is freely available, either on the company's website or by addressing a request to Compliance@windiam.com

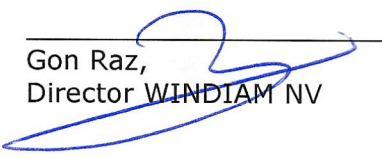
2. Risk Assessment:

WINDIAM NV has done a Human Rights Due Diligence review in preparation of its RJC Recertification 2021/22. To date, no risks (neither actual or potential) have been identified.

3. Response:

To date, no specific risks have been identified with regards to Human Rights, as such, no specific extra steps needed to be undertaken by the Company to manage risks, monitor and track performance of risk mitigation or to follow up any specific risk-areas.

Antwerp June 14th, 2021



Gon Raz,
Director WINDIAM NV