

WINDIAM NV Supply Chain Due Diligence Reporting

Preamble:

WINDIAM NV has aligned its Supply Chain Due Diligence communication and reporting on RJC's Guidance for this subject (p. 65 of RJC COP 2019 Guidance Document, table 7.5.). 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 Supply Chain Policy document which is available on the company's website. The Management responsibility for the 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.

2. Risk Assessment:

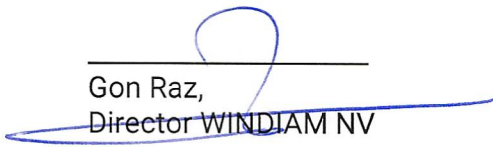
In preparation of its RJC Audit, WINDIAM NV has engaged with all its suppliers by sending them its Supply Chain Policy and a Due Diligence Questionnaire, both accompanied by an explanatory letter on RJC's COP 7 and the Company's obligations in this respect. To date, the majority of suppliers have sent this questionnaire back, and the Company strives for 100% completion of supplier-response within 6 months.

To date, no risks (neither actual or potential) have been identified, but the Company will strive to obtain more detailed information (whether in a formal or in an informal way) from their suppliers.

3. Response:

To date, no specific risks have been identified in our supply chain, 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