At IGC Group of Companies (IGC), we are committed to the topic of ethical diamond sourcing and we are dedicated to combating the scourge of conflict diamonds.
We assure that we comply with all requirements and regulations with regard to the Kimberly Process, the United Nations Resolutions, and the WDC System of Warranties (SoW), and we require the same assurances from our suppliers.
We have adopted and committed to a Supply Chain Policy that adheres to the OECD Due Diligence Guidance for a Responsible Global Supply Chain of Minerals from Conflict-Affected and High-risk Areas. This Supply Chain Policy is endorsed by the highest level of IGC's Management and Board of Directors (BoD).

A. RESPONSIBLE DIAMOND SOURCING

IGC Group offers a wide range of natural polished diamonds, including carat stones, pointers, melees, and fancies. We procure our rough diamonds only from renowned large-scale mining companies, such as De Beers among others, and from the open market.
We do not source from conflict-affected and high risk areas, nor from artisanal and small-scale mining.
IGC is not involved in the production, manufacturing and trade of Lab-grown Diamonds, Treated Diamonds and Simulants.

Assurance:
As per the World Diamond Council SoW requirement, we mention the following clauses on every incoming and outgoing invoice or memo:

"The diamonds herein invoiced/on memo have been purchased from legitimate sources not involved in funding conflict, in compliance with United Nations Resolutions and corresponding with national laws. The seller hereby guarantees that these diamonds are conflict free and confirms adherence to the WDC SoW Guidelines"

"The diamonds herein invoiced/on memo are exclusively of natural origin and untreated based on personal knowledge and/or written guarantees provided by the supplier of these diamonds." Furthermore, we state on our invoice/memo that: "We guarantee that the diamonds herein invoiced do not originate from Russian rough diamonds procured after February 24th, 2022."

Disclosure

IGC's employees are required to know what the differences are between Lab-Grown Diamonds, Treated Diamonds, and Simulants (LTS). In case IGC would sell any LTS, it would need to be disclosed before the sales transaction takes place, as well as on all documents related to the transaction. It must be disclosed up to end-consumer level.

Sourcing:

We purchase our diamonds only from reliable and respected suppliers who abide by and impose the highest ethical standards throughout their entire value chain, and with whom we have a long-standing business relationship. We don not procure diamonds from unknown sources, reducing the risk of dealing with conflict diamonds substantially. To ensure this, we require every supplier to fill out a due diligence form, wherein they are required to relay the type and goods supplied in %; a list of all mines, mining companies, regions or geographical locations their rough diamonds come from; the location where consolidation of rough and/or polished stones is done; the policies and/or procedures the supplier has in place to ensure responsible sourcing and no link to CAHRA's(*); and whether they adhere to OECD guidelines. Based on this information, our Compliance Officer assesses whether our supplier in question is credible and complies with our sourcing standards; hereby determining if business relations can ensue. If we should ever engage with red flag supply chains, which may relate to the location, supplier or circumstance that triggers a need for enhanced due diligence (that is, further

investigation) IGC would require its supplies to share the following information, in addition to the abovementioned points:

- identity of all suppliers and service providers (e.g., transport companies) from origin to export/import, including ownership, corporate structure (officers and directors), and affiliations (business, government, political, military);
- all taxes, fees, or royalties paid to the government for material extraction, trade, transport, and export;
- all payments or compensation to government agencies and officials for material extraction, trade, transport, and export (including facilitation payments); and
- all payments to public or private security forces or armed groups at any point in the supply chain from extraction onwards (unless prohibited by law).

(*)CAHRA: "Conflicts Affected and High-Risk Areas" . It refers to regions or areas that may be significantly impacted by conflict, human rights abuses, or other high-risk factors.

B. INTEGRITY

Product Integrity

IGC attempts at all times to comply with local and international standards applicable to loose diamonds. Every reasonable effort will be made to disclose all relevant information on the physical characteristics such as the weight, cut, color, and clarity.

- Wherever possible, IGC Member Entities will source loose diamonds within the IGC Group of Companies.
- All loose diamond purchases are subject to a 100% quality control by trained and experienced diamond staff. All pertinent diamond information will be recorded and communicated on sale.
- IGC does not sell treated diamonds, diamond simulants or synthetic diamonds. IGS's Natural Diamonds Assurance Protocol guarantees that the diamonds sold are natural diamonds

Ethical Sourcing- Provenance

As we are committed to the trade of diamonds that are sourced in compliance with the highest ethical standards, free of conflict, and strictly adhering to the human rights, we are not purchasing diamonds that origin from prohibited sources such as the MBADA and Marange Mines in Zimbabwe and Russia.
We provide the necessary provenance claims to our customers, which we similarly also require from our vendors.

Pipeline Integrity

We assure that our diamonds are handled in a secure process which allows traceability throughout our product flows and manufacturing processes.
Regular pipeline integrity assessments are performed at each pipeline entity, both by internal assessors and by independent third-party auditors.

C. OECD DUE DILIGENCE

At IGC, we undertake risk-based due diligence, which involves a reasonable investigation to identify, assess, prevent and mitigate risks in our supply chain where the level of supply chain analysis is proportionate with the identification of risks.
Within this investigation process, we aim to identify any and all potential red flags. A red flag is a warning or indicator of a potential risk, which can refer to a location, supplier or circumstance. If a red flag would be identified, we will proceed with enhanced due diligence and further investigation.

We will immediately suspend or discontinue engagement with upstream suppliers where we identify reasonable risk that they are sourcing from, or linked to, any party committing serious abuses against human rights or participate in money laundering practices.
Performing extensive due diligence is a complex, demanding process and requires adequate resources. Therefore, we have a full-time Compliance Officer at our headquarters in Antwerp, who is knowledgeable and dedicated to this process. Regular review by and reporting to the Group Compliance Officer is done, at least annually.
An annual report to IGC's BoD is done on any red flags or concerns that may have arisen during its due diligence processes for ethical and honest pipeline.

D. DUE DILIGENCE TOOLKIT

IGC performs its due diligence for both its supply chain and customer base with a dedicated Compliance Officer. A detailed description of the due diligence process and tools can be found in IGC's AML Policy and Procedures, which is published on our website.

E. SUPPLIER ENGANGEMENT

We request from both our rough and polished suppliers the same level of due diligence regarding their supply chains and require communication about it. As a De Beers Sightholder and RJC Certified Member, we expect form our suppliers that they sign an undertaking in which they declare to adhere to the De Beers BPPs and RJC CoP. We also request our suppliers to complete our due diligence questionnaire as part of our supply chain risk assessment.
We require our suppliers to provide additional information regarding the origin of the supplied diamonds to us. We request both our rough and polished suppliers to provide the provenance of the rough diamonds (country of origin and/or mining company) as well as the guarantee that the diamonds are sourced/produced ethically.

F. COMMUNITY DEVELOPMENT

IGC seeks to support the social, economic, and institutional development of the communities in which it operates and supports various community initiatives.
As a company, we develop programs and support projects with the goal to improve the economic and social welfare of the communities involved in our supply chain.
We support our employees in their participation in community programs aiming at enhancing society and we assist them where relevant.

G. ENVIRONMENT

IGC participates progressively in a better future by taking environmental issues as challenges and partnering with legitimate NGO's. We acknowledge that we have a responsibility to make the world a better place and thereby abide by guidelines and legislation, such as, the "Sustainable Development Goals of UN", the CSRD and other measures to lower our carbon footprint and reach carbon and climate targets By aiming to decrease our greenhouse gas emissions and minimize our impact on climate change, we foster sustainability, mitigate environmental damage, and support the transition to a low-carbon economy.

H. SUPPLY CHAIN GRIEVANCE MECHANISM

At IGC, we prioritize transparency and accountability within our supply chain by offering all parties, including affected stakeholders and whistle-blowers, a robust mechanism to raise concerns about businesses, organizations, individuals, or activities involved in our operations. This grievance mechanism serves as an essential tool for identifying and addressing issues that may otherwise go unnoticed, enabling us to take timely action to rectify any concerns raised. We are committed to fostering an environment where individuals feel safe and empowered to report issues without fear of retaliation.

All complaints will be treated with confidentiality, and IGC pledges to investigate allegations thoroughly while protecting the rights and anonymity of those who come forward.

Supply Chain Grievance Procedure:

When receiving a complaint, we:

- obtain an accurate report of the complaint;
- allow for anonymous reporting of concerns or incidents;
- undertake to protect reporting parties from retaliation and will treat all reports in a confidential and sensitive manner;
- explain our complaint procedure;
- learn how the appellant would like to see the complaint handled;
- appoint the appropriate person internally to handle the complaint;
- if needed, assist with redirecting the complaint to another entity such as the relevant supplier, or an institution such as a relevant industry body;
- if the issue can be handled internally, seek further information where possible and appropriate;
- identify any actions to be taken, or monitor the situation;
- advise the appellant about any decisions or outcomes; and
- keep records on complaints received and the internal process followed for at least 10 years.

Concerns and/or complaints can be raised via email of telephone to:

IGC GROUP NV
Schupstraat 15 – BE 2018 Antwerp
Tel. +32 3 203 45 67

Anne-Marie De Scheemaecker
ADS@igcgroup.com

or

Josephine Derks
JDE@igcgroup.com