Purpose

The IGC Group of Companies (IGC) is committed to maintaining compliance with all applicable laws, international conventions, and declarations. This procedure ensures effective communication of company policies regarding business ethics and integrity to all relevant employees and stakeholders, aiming to combat dishonesty and fraud, thereby protecting the diamond industry's integrity and reputation.

Governance and Responsibility

- Group Compliance Officer (GCO): Oversees compliance, promptly investigates reported violations, and implements corrective and preventive actions to strengthen ethical practice.
- Board of Directors (BoD): Receives regular reporting on compliance matters and approves corrective and preventive actions
- Local Compliance Officers: to reinforce daily adherence and raise concerns quickly

Reporting and Transparency

- Reporting to the Board of Directors (BoD)
- From the moment the GCO receives any notification of potential misconduct, investigation starts without delay. Findings and recommended actions are communicated to the BoD.
- The BoD will decide necessary corrective and/or preventive actions. The GCO will oversee effective implementation. Timelines will be reasonable and proportionate to the case severity, with continuous status updates to the BoD and stakeholders

Applies To

- All relevant employees and stakeholders involved in IGC operations.

Commitment and Implementation

IGC promotes responsible business practices, endorsed by senior management. Policies and procedures are clearly communicated to employees and made publicly available on IGC's website

The company operates with honesty, integrity, transparency, and respect for human rights and the environment, maintaining the highest ethical standards in all operations

IGC commits to continuously improve its controls, training, and communications to prevent misconduct and protect stakeholders.

Violation and Procedure

❖ Whenever IGC or any of its directors are involved in:

- any business-related activity that has resulted in a material conviction, or any material penalty imposed by a government, industry or other regulator; and
- any activity that could have brought the diamond and jewelry industry or IGC into serious disrepute or could have damaged the consumer's perception of diamonds, jewelry, or the diamond and jewelry industry;

the BoD notifies the GCO immediately

❖ Whenever a manager, officer or employee within IGC encounters or suspects any of the following within IGC or with any of its customers, suppliers, subcontractors or other business associates:

- deviations from the IGC principles or policies in general;
- fundamental differences in ethical, social and environmental policies and/or behavior;
- any conduct that intentionally or recklessly endangers or harms the health and welfare of individuals;
- any behavior that may violate competition law, such as anti-competitive agreements, abuse of market power, or unfair trade practices
- any other behaviors and actions which are not in line with the BPP/RJC guidelines,

this manager, officer or employee notifies the GCO immediately.

From the moment the GCO receives any of the notifications listed above he/she starts to investigate the case without delay. Based on this investigation, the GCO will decide on the appropriate corrective and/or disciplinary actions to be taken.

Compliance and Monitoring

- Training: regular ethics and integrity training for all employees.
- Monitoring: regular audits and risk assessments to identify and address gaps in ethics and integrity controls.
- Public disclosure: where appropriate, key policies and commitments are publicly available to reinforce accountability and trust

Review

Annual reviews to assess ongoing suitability and adequacy of ethical practices, with improvements implemented to address identified gaps.

Reporting

Depending on the case, actions may include:

- Documented BoD report;
- BoD session for extraordinary review;
- BoD-endorsed report and explanation to a governance committee

The BoD will decide on corrective and/or preventive actions. The GCO will ensure their effective implementation. Delays will be reasonable and justified relative to the severity of the case.

Contact information: reports may be submitted via email to PNA@igcgroup.com or ADS@igcgroup.com

Anonymity: reporters may choose to remain anonymous. IGC will protect against retaliation and will maintain confidentiality to the extent possible.