

Supply Chain Policy

1. **PURPOSE:**

The purpose of this policy is to ensure that LANGERMAN DIAMONDS embeds supply chain due diligence practice in its daily operations. We are committed to provide a supply chain which is free of human rights abuses based on the relevant OECD Framework and on documented evidence.

2. **POLICY:**

1. This policy confirms LANGERMAN DIAMONDS's commitment to respect human rights, avoid contributing to the finance of conflict and comply with all relevant UN sanctions, resolutions and laws.

2. LANGERMAN DIAMONDS is a 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 (See COP 6);
- b. do not engage in or tolerate bribery, corruption, money laundering or finance of terrorism (See COP 12);
- 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 (See COP 29);
- e. enable stakeholders to voice concerns about the jewellery 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 (COP 7). This process is led by the Company's CEO, who provides the necessary resources and manpower to create sustainable management systems that will allow the Company to implement the OECD framework in a time-frame consistent with the RJC timelines foreseen for the COP7 standard.

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 relationships 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 the extraction, transport or trade of diamonds: 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 (See COP 20);
- c. the worst forms of child labour (See COP 19);

- d. human rights violations and abuses (See COP 6); or
- e. war crimes, violations of international humanitarian law, crimes against humanity or genocide (See COP 29).

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 diamonds that are fully compliant with the Kimberley Process Certification Scheme and, as such, 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 minerals:

We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of minerals, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of minerals.

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 minerals.

11. Regarding laws and regulations

We do not accept violations of laws and regulations issued by Applicable Sanctions Authorities.

- a. We comply with all applicable laws and regulations issued by the Applicable Sanctions Authority 2 (hereafter referred as the "Sanctions 3"), included but not limited to EU Regulation 833/2014, as from time to time amended and supplemented.
- b. Neither Langerman Diamonds, nor any party that owns or controls it directly or indirectly (including individuals), is sanctioned by any Applicable Sanctions Authority;
- c. The performance of Langerman Diamonds would or could not result in any violation of, or be inconsistent with, any Sanctions, or expose suppliers to other Sanctions risks, including,

without limitation, the risk of being designated as a sanctioned person by any Applicable Sanctions Authority.

3. SYSTEMS & PROCEDURES:

See Addendum to this policy

4. RESPONSIBILITY FOR THE POLICY:

We live up to these commitments in the way we do business and we expect the same from our suppliers. To fulfill these commitments, our due diligence practices are inspired by the OECD 5-step framework:

1. We structure our business internally to effectively perform due diligence on our supply chain through:
 - a. this Supply Chain Policy setting out our commitments and expectations towards our suppliers;
 - b. assigning a responsible, dedicated person for our supply chain due diligence, and following training on due diligence practices.
 - c. gathering key information from our suppliers and further engage with them to understand the origin of our diamonds.
2. We have processes in place to identify and address risks in our diamond supply chain while making use of the diamond industry specific legislation and self-regulating initiatives such as:
 - a. Kimberley Process Certification Scheme (KPCS) guaranteeing conflict-free diamonds;
 - b. Diamond Office performing triple control measures on diamond imports/exports into the European Union;
 - c. World Diamond Council System of Warranties requiring buyers and sellers of rough diamonds, polished diamonds and jewelry containing diamonds include a statement on B2B invoice and memos that the goods being sold are in compliance with the KPCS and additionally warranting promotion of universal standards on human rights, labor rights, AML, anti-corruption practices in the company and dealings in diamonds by means of completing a self-assessment;
3. Risk Mitigating and follow-up measures on our supply chain risks:
 - a. If we identify that business partners do not share our values and live up to our commitments, we will investigate, analyze and take up these forms of non-compliance with our business partners in order to define concrete mitigation measures. In case of serious forms of non-compliance with our commitments or failure to apply proper mitigation measures, we will immediately stop engaging with these business partners.
 - b. We welcome any concerns that you might have about cases of non-compliance from our business partners which can be reported directly to Stefan Langeman, CEO of Langerman Diamonds, and/or to the Head of Compliance at the Antwerp World Diamond Centre. Your grievances will be assessed and kept confidential.

5. REPORTING REQUIREMENTS:

Breaches of this policy will be reported to the CEO and will be part of the yearly reporting on Supply Chain Issues.

ADDENDUM: Supply Chain Due Diligence Procedures

Antwerp, (effective from) November 3rd, 2025



Stefan Langerman
CEO LANGERMAN DIAMOND