GROUP DIANCO – Responsible Sourcing Policy

Version 2026

Whenever doing business Group Dianco is committed to follow its values of Responsibility, Mutual Respect, Integrity and Honesty. As a result of these business principles Group Dianco has implemented a Responsible Sourcing Policy which defines the way to source goods and services from the market. Group Dianco therefore is committed only to do business with suppliers who follow business practices which are aligned with our Values and our Ethics.

In addition to the legal standards mentioned in this Code, suppliers will comply with all other applicable laws in the provision of products or services to Group Dianco. Group Dianco applies a “Zero Tolerance” regarding unethical business behaviour, bribery, corruption, sanctions breaches and forced labour.

The Group Dianco Code of Business Conduct for Suppliers

This Code of Business Conduct for Suppliers sets forth basic principles for supplier conduct when working with Group Dianco. Group Dianco is committed to these principles and expects its suppliers to be as well.

Human Rights and Labour Practices

Respect for People is a core Group Dianco value. Suppliers must respect the Human Rights of their employees and treat them fairly and with respect, in accordance with applicable laws.

- **No Forced and Compulsory Labour:** Suppliers will not use forced or involuntary labour, including indentured labour, bonded labour or slave labour.
- **No Harassment and Abuse of Labour:** Suppliers will ensure that their employees are not subjected to psychological, verbal, sexual or physical harassment or any other form of abuse, and will comply with all applicable laws on harassment and abuse of employees.
- **No Child Labour:** Suppliers shall not employ workers under the age of 15 or, in those countries subject to the developing country exception of ILO Convention 138, under the age of 14. Workers under the age of 18 shall not perform hazardous work.
- **No Discrimination:** Suppliers must promote equal opportunities, not discriminate in any condition of employment on the basis of race, colour, national origin, sex, religion, age, disability or any other personal characteristic unrelated to job performance, and will comply with all applicable employment discrimination laws.
- **Appropriate Work Hours and Wages:** Suppliers will comply with applicable laws on work hours and overtime, as well as applicable laws on wages and

benefits. Where no sufficient legal protection exists, suppliers must ensure at least 1 uninterrupted day off per week and compensate work at a minimum so that employees can meet their basic needs.

Environment, Health and Safety

Group Dianco's commitment to sustainability includes efficient use of resources in the light of the Circular Economy, as well as the commitment to protect the environment and to provide healthy and safe workplaces. Group Dianco is committed to avoid using conflict resources and expects its suppliers to make similar commitments and to continuously improve their environmental, health and safety performance.

- **Respect the Environment:** Suppliers will comply with applicable environmental laws and shall have systems in place to ensure safe management of waste, air emissions and wastewater discharges. Suppliers must seek to continuously minimize environmental impact and make continuous improvements to resource efficiency, for instance by using recycled materials.
- **Protect Health and Safety:** Suppliers will provide a safe and healthy workplace for their employees, including appropriate controls, training, work procedures and personal protective equipment. Suppliers will comply with all health and safety laws that are applicable to the workplace.

Ethics and Legal Requirements

Group Dianco expects its suppliers to conduct their business ethically and in compliance with the law.

- **Avoid Conflicts of Interest:** Suppliers will avoid any interaction with a Group Dianco employee that may conflict, or appear to conflict, with the employee's ability to act in the best interests of Group Dianco.
- **No Bribery:** Group Dianco does not tolerate corruption in any form. Suppliers shall not influence nor seek to influence Group Dianco employees by payments of money or any other thing of value, including corporate hospitality and gifts. Group Dianco requires compliance with all applicable anti-bribery and corruption laws in the conduct of business. Compliance is required of any third party acting for or on our behalf, such as agents, distributors, contractors, consultants, etc. Bribery is corruption. It is the giving to or receiving by any person of anything of value, either directly or indirectly, as an inducement to gain an undue commercial, contractual, regulatory or personal advantage or to influence contrary to the principles of honesty and integrity. Bribery can occur, and is unlawful, in both the private (between commercial companies) and the public sector (bribing a public official).
- **Fair Competition:** Suppliers will be committed to vigorous, lawful, straightforward and ethical competition and must ensure that their business practices fully comply with the competition laws wherever they do business.
- **Accurate Accounting and Business Records:** Suppliers will keep accurate records of all matters related to the supplier's business with Group Dianco companies.
- **Protect Information:** Suppliers will protect Group Dianco confidential information and act to prevent its misuse, theft, fraud or improper disclosure. Suppliers must take all due care in handling, discussing or transmitting

sensitive or confidential information that could affect Group Dianco, its employees, its customers, the business community or the general public.

- **Conflict-Free Diamonds:** Suppliers will only supply rough diamonds traded in compliance with the Kimberley Process Certification Scheme, and will include the World Diamond Council System of Warranties statement on all invoices for rough, polished and set diamonds.
- **Sanctioned Parties and Prohibited Origins:** Suppliers, including couriers (armed or not), may not use any supplier of goods, services or equipment which (a) is located in any country subject to United Nations, U.S., UK or EU economic sanctions (or is acting on behalf of persons or entities located in such countries) or (b) appears on lists of restricted or prohibited persons maintained by the United Nations, U.S., UK, EU or the country of manufacture, origin or destination. Suppliers may not supply diamonds mined, processed or produced in the Russian Federation, including diamonds of Russian origin cut or polished in a third country, and must provide the declarations and traceability information required under the G7 and EU sanctions regimes on request.

Expectations in Respect to the Code of Business Conduct for Suppliers

Group Dianco expects suppliers to implement systems and controls to promote compliance with applicable laws and the principles set forth in this Code, including policies, training, monitoring and auditing mechanisms. Suppliers should also apply these or similar principles to the subcontractors and suppliers they work with in providing goods and services to Group Dianco.

Group Dianco reserves the right to assess and monitor suppliers' compliance with this Code. Suppliers who are not in compliance with this Code are expected to implement corrective actions or face the prospect of not being considered by Group Dianco for future business.