DIANCO

BRINGING DIAMONDS TO LIFE

GROUP DIANCO

Policy on Human Rights

VERSION 2026

Background:

We are part of the societies in which we operate; opportunities and challenges in the local communities are our challenges and opportunities alike. Our investments, our diamond trade, our payments and our supply chains have a global impact. This entails both local and global responsibilities on our part. We recognize the possible risk of adverse human rights impact through our activities or as the result of our business relations. We are committed to always operate in accordance with universal human rights, and this approach applies to all markets where we operate and to all our business relations. Respecting human rights is fundamental in our commitment to be a sustainable and responsible diamond group. In particular, we will promote and respect human rights by contributing to the development of a sound, transparent and sustainable diamond market.

Purpose:

The purpose of this policy is to provide a basis for Group Dianco's work to respect human rights throughout all business functions: our employees, our business relations and our supplier engagements.

Definition:

Human rights are defined as universal rights that should allow individuals the freedom to lead a dignified life, free from fear or want, and free to express independent beliefs. These rights shall be applied equally and universally in all countries for all individuals, regardless of nationality, place of residence, sex, national or ethnic origin, colour, religion, language, or any other status.

We base our human rights definition and commitments on The International Bill of Human Rights. We also support the principles concerning fundamental rights stipulated in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, as well as the United Nations Convention on the Rights of the Child. Furthermore, we are committed to use the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (2023) as a starting point for our responsibility to respect human rights.

Our responsibility:

Our responsibilities in respecting human rights are:

- To avoid causing or contributing to adverse human rights impacts through our own activities, and address such impacts when they occur, stressing organizational responsibility as well as individual responsibility in Group Dianco's business conduct.
- To seek to prevent or mitigate adverse human rights impacts that are directly linked to our operations, products or services by our business relationships, even if we have not contributed to those impacts.
- To use our potential influence on people proactively as leverage to strengthen respect for human rights within our business operations and value chain.
- To embed the respect for human rights as an integral part of Group Dianco´s vision and values, and to encourage our employees to uphold human rights throughout the group entities.

Commitments and guiding principles:

Diversity and gender equality.

We endorse the principles of diversity and gender equality. Gender equality and diversity is for Group Dianco ultimately the ability to utilize a variety of experiences and competencies that make diversity a factor in consistently raising profitability and ensuring that Group Dianco remains an attractive employer, partner and diamond group. Consequently, gender equality and diversity are of strategic importance. Non-discrimination and inclusion are fundamental to our business.

Act with due diligence.

We act with due diligence to avoid infringing on the rights of others in our business activities and operations. Hence, we assess human rights risks in business relations and decisions. The risk assessment contains a sustainability risk framework stipulating human rights criteria in all business processes, supplier engagement and investments, and an exclusion list of companies we won't do business with based on, among other areas, their violation of human rights or their appearance on applicable sanctions lists.

Labour rights.

We promote human rights in our labour practices and accept no discrimination. The respect of labour rights includes, but is not limited to, freedom of association, the right to collective bargaining and no child or forced labour.

Special attention to vulnerable groups.

We recognize that children are an especially vulnerable group and that we all share the responsibility to respect and promote children's rights. As an international diamond group we acknowledge our responsibility to do our utmost to prevent our trade and supply chain from being used to abuse children's rights. We recognize that particular groups, such as women, indigenous people, artisanal miners and minority groups, are especially vulnerable to violations of their human rights. We commit to paying special attention to protecting their enjoyment of rights, also applying cross-cutting principles on non-discrimination, participation and accountability.

Salient human rights issues.

Group Dianco prioritizes those human rights issues that are possibly salient to its business. We will assess the possible salient issues regularly via systematic human rights risk and impact assessments conducted in accordance with the UNGPs:

- Child labor
- Corruption and bribery
- Environmental issues impacting human rights
- Fair employment
- Health and safety
- Human trafficking and modern slavery
- Impact on communities and land rights
- Information security and data privacy
- Sourcing from conflict-affected and high-risk areas

Tax revenue.

We acknowledge that tax revenues can be an important contribution to societies' work with human rights. We therefore contribute our fair share in the countries where we operate, by paying the correct amount of tax in due time. We encourage our business partners to do the same.

Stakeholder dialogue.

We are committed to engage continuously with external stakeholders in order to strengthen our capacity to improve our human rights policy and its statements. We do our utmost to have an ongoing and transparent dialogue with our stakeholders, to enable our stakeholders to understand our work, challenges and ambitions.

Remedy.

We acknowledge that despite concerted efforts, abuse can occur. If the Group's activities entail a direct violation of the human rights of others, we shall take action to rectify the situation, taking into account the interests of those whose rights are being violated. Concerns can be raised through the Group Dianco Grievances Policy, the Human Rights Complaint Form or the Whistleblowing Policy.

Review.

This policy is reviewed annually by the senior management of Group Dianco and updated when needed to reflect changes in our activities, legislation and international standards.