GROUP DIANCO - GRIEVANCES POLICY (SUPPLIERS – CUSTOMERS)

VERSION 2026

PURPOSE

The purpose of this policy is to outline the processes Group Dianco uses to manage and respond to customer or supplier grievances. Further, the purpose of this Grievance Policy is to provide a mechanism by which customers or suppliers can appeal on issues faced with either polished or rough diamonds, services rendered by Group Dianco or general behavior on the international diamond market. Under this procedure, they can request an investigation of the whole process by the Management of Group Dianco.

SCOPE

This policy applies to customers and to suppliers with whom the Group Dianco affiliates are dealing in relation to their commercial activities as a worldwide trading diamond group.

BACKGROUND

Group Dianco believes in being fair and unbiased to any customer or any supplier dealing with the Group Dianco affiliates. Group Dianco's aim is to ensure that customers and suppliers associated with it have the right to respectful and responsive services and goods. In case an incident arises by which the customer or supplier is aggrieved, the matter needs to be addressed in a fair manner and corrective steps taken when necessary.

It is in this connection that Group Dianco implemented the grievances policy with a clear process to bring grievances forward and have them resolved in a timely manner.

RESPONSIBILITY

Senior management of Group Dianco

GUIDELINES

1. This policy is applicable to those instances:
    1. where the goods do not have the right quality;
    2. where an order has not been delivered on time;
    3. where a service request has not been attended to;
    4. where abuses were found in doing business and behavior in a general sense (e.g. competition, sourcing, sanctions, human rights, …).

2. This policy covers instances where the Group Dianco affiliates have sold rough or polished diamonds and the performance is not as per the prescribed standards, so that the customer feels aggrieved about the same.
3. This policy covers instances where the customer has placed an order for polished or rough diamond(s) and the same has not been delivered by the entity of Group Dianco in spite of the customer having fulfilled all formalities/requirements.
4. This policy covers instances where the customer or supplier has placed a request for service and the same has not been attended to for more than 48 hours.
5. This policy also covers all other grievances within the commercial activities and the general behavior developed by the Group Dianco affiliates.
6. The preferred method for submitting a customer or supplier grievance and / or concern is through the standard Complaint / Concern Form, added hereto, sent to the management of the local entity. Grievances may also be submitted in writing by e-mail.
7. In case an aggrieved party contacts a staff member in respect of any grievance and / or concern, the staff member shall consult the local management for further instructions.
8. Any exceptions other than what has been detailed in this policy will be addressed on a case-by-case basis. However, all exceptions need to be approved by senior management of Group Dianco before the same can be considered.
9. The aggrieved party has to deliver his complaint(s) within 14 days of the facts being known.
10. The local management must always inform senior management of Group Dianco when a complaint is received.
11. The local management will contact the aggrieved company in writing (including via e-mail) within seven business days after receipt of the grievance and / or concern with the following:
    1. An overview of the grievance and / or concern process;
    2. A request for additional information (if applicable);
    3. An initial timeline for review and resolution of the grievance and / or concern.
12. The local management will be responsible for reviewing all appropriate records related to the grievance / concern. In addition to reviewing the data, the local management will be responsible for interviewing internal personnel as appropriate.
13. Notwithstanding anything contained in the above, the following will not be a valid grievance:
    1. In case the aggrieved party fails to submit the grievance by the deadline specified in this policy and/or fails to meet other minimum requirements essential to investigate a grievance and / or concern, such cases shall not be subject to review.
    2. As a policy the local management shall send 2 written reminders to the aggrieved party for submission of data/information essential for conducting the investigation. If, in spite of the above, the aggrieved party does not cooperate and the relevant data/information has not been received within 10 days from the last written reminder, the grievance will be closed.

3. Any other matter which in the decision of the local management does not qualify the grievance to be admitted.

14. Group Dianco shall provide a written response to the aggrieved party within 45 days of receipt of the original grievance indicating disposition of the matter, unless such time period has been extended in order to obtain feedback not readily available. However, in any case Group Dianco shall dispose of the matter within 90 days of the receipt of the original grievance.
15. In case the aggrieved party is not satisfied with the decision of the local management, the said party can escalate the matter to the senior management of Group Dianco.
16. Pursuant to the grievance being heard, the decisions which shall be taken by Group Dianco could be one of the following:
    1. Uphold the decision of the local management by the senior management of Group Dianco.
    2. Replace the rough or polished diamonds when the other parcel(s) are returned.
    3. Inform the aggrieved party on the measures taken by Group Dianco to avoid new conflicts in the future.
    4. Provide or redo the required service in a proper way.
17. Grievances are handled confidentially. Group Dianco will not take any retaliatory action against a customer, supplier or other party for submitting a grievance in good faith.
18. All grievances, the actions taken and their outcome are recorded by the local management and reported to the senior management of Group Dianco, which reviews them annually as part of the Business Responsibility annual report.