DIANCO

BRINGING DIAMONDS TO LIFE

VERSION 2026

GROUP DIANCO – WHISTLEBLOWING POLICY

Policy Statement:

Group Dianco is dedicated to fostering an open and transparent workplace culture where the concerns of our staff are valued and where they feel empowered to raise issues with management. We firmly believe that creating a working environment built on trust, communication, and fairness is essential for the well-being of the group.

- This policy aims to enable and encourage staff to raise concerns within Group Dianco.
- Group Dianco is committed to creating a safe, open and transparent workplace culture, where employees are encouraged to raise concerns at the earliest opportunity. Group Dianco recognises that employees are often the first to realise that there may be something wrong within an organisation.
- It is important to Group Dianco that any fraud, misconduct or wrongdoing by staff members of the organisation is reported and properly dealt with. Group Dianco is committed to tackle malpractice and wrongdoing. Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. If any cases of wrongdoing are upheld they will be seriously dealt with.
- Group Dianco encourages staff to use internal mechanisms for reporting malpractice or illegal acts or omissions by employees or ex-employees. Employees will be listened to and serious concerns will be investigated.
- Group Dianco will ensure that all new employees are informed of the policy and will provide refresher training to all members of staff so that they are aware of whistleblowing law and know how to use this policy.
- Resources will be made available to fulfil the aims of this policy. The policy will be promoted amongst all the entities of Group Dianco.
- This policy allows staff to take the matter further if they are dissatisfied with the management response and aims to reassure staff that they will be protected from harassment or victimisation from co-workers or from Group Dianco for raising concerns.

Definitions and Scope:

This policy applies to all staff of Group Dianco and its entities including temporary staff and trainees and/or apprentices. Other individuals who work or have worked within Group Dianco, such as former staff, job applicants, volunteers, the self-employed, contractors, shareholders and members of management, are also encouraged to use it.

For the purpose of this policy Group Dianco recognises that whistleblowing is the passing on of information about wrongdoing at work.

The whistleblower must have reasonable grounds to believe that the information reported was true at the time of reporting. The categories of wrongdoing are:

- a criminal offence (such as fraud or illegal tax evasion);
- bribery, corruption or facilitation payments;
- money laundering, terrorist financing or a breach of sanctions (including the trade in prohibited diamonds of Russian origin);
- a breach of the Kimberley Process, the System of Warranties or Group Dianco's sourcing policies;
- human rights abuses in our operations or supply chain, including child labour or forced labour;
- a breach of any legal obligation, including breaches of EU law within the scope of the EU Whistleblower Directive;
- a miscarriage of justice;
- endangering an individual's health and safety;
- damage to the environment;
- deliberate concealment of information about any of the above.

Examples of wrongdoing might include (but are not restricted to):

- unsafe working conditions;
- lack of, or poor, response to a reported safety incident;
- inadequate induction or training for staff;
- suspicions of fraud;
- a bullying culture (across a team or organisation rather than individual instances of bullying);
- theft;
- goods of doubtful or undeclared origin entering the supply chain.

It is not necessary for the member of staff to have proof that wrongdoing is being, has been, or is likely to be committed. A reasonable belief is sufficient to disclose the concern. The member of staff has no responsibility for investigating the wrongdoing. It is Group Dianco's responsibility to ensure that an investigation takes place.

A member of staff who makes such a protected disclosure has the right not to be dismissed, subjected to any other detriment, or victimised, because they have made a disclosure.

Group Dianco recognises that confidentiality clauses in employment contracts, settlement agreements or non-disclosure agreements do not prevent members of staff from making protected disclosures and are void to that extent.

If the wrongdoing that the staff member wants to disclose is not included in the list above, advice may be sought from the designated responsible persons within Group Dianco and its entities or from a trade union representative on the use of the appropriate policy.

This policy is not for staff with concerns about their employment that affect only them – that type of concern is better suited to the Complaints & Grievances policy of Group Dianco.

Group Dianco recognises employees may wish to seek advice and be represented by their trade union officers or another trusted person when using the provisions in this policy.

This policy will be reviewed annually by senior management of Group Dianco. Where review is necessary due to legislative change, this will happen immediately per entity of Group Dianco.

Roles and Responsibilities:

The senior management of Group Dianco is responsible and accountable for this 'Whistleblowing Policy and Procedure'. They will:

- demonstrate commitment to developing an open culture within the organisation, through actions and strategy;
- receive and review annual reports on whistleblowing activity;
- appoint a designated responsible person per entity.

All staff have a duty to report wrongdoing (whistleblow) under the circumstances set out in the above section of this policy.

Each entity of Group Dianco is responsible for:

- ensuring all staff are aware of this policy and procedure and their responsibilities;
- investigating issues raised promptly and thoroughly;
- fostering an open culture within the entity;
- ensuring any whistleblower is not subject to detriment;
- escalating issues and engaging the support of designated officer/s where required.

The appointed responsible person of each entity of Group Dianco has responsibility for the whistleblowing procedure and for dealing with issues raised. He / She must:

- oversee the whistleblowing policy;
- provide advice and support;
- ensure learning from whistleblowing cases is fed back to the wider organisation;
- investigate issues raised with them promptly and thoroughly;
- inform the senior management of Group Dianco of all reported disclosures and the actions being taken;
- ensure the process is monitored and improved where possible;
- provide reports on whistleblowing activity on an annual basis to the senior management of Group Dianco;
- treat the concern confidentially unless otherwise agreed;
- ensure the staff member receives timely support to progress their concern;
- ensure the staff member has access to personal support as it is recognised that raising such a concern may be stressful.

How to raise a concern:

In many circumstances, the easiest way a member of staff can get their concern resolved will be to raise it formally or informally with the responsible person of the entity for Group Dianco.

If this is not appropriate, the member of staff can approach the senior management of Group Dianco directly. They will then confirm how the matter will be investigated.

Concerns can be raised in writing (including e-mail, preferably using the Group Dianco Whistleblower Report Form), orally, or in a meeting at the reporter's request.

The report should set out the background and history of the concerns, giving names, dates and places where possible, and the reason why the member of staff is making the disclosure.

Any member of staff who wants to raise a concern is free to seek independent legal advice.

When any meetings are arranged with an individual who is making or has made a protected disclosure, they have a right to be accompanied by a trade union representative or another trusted person. The meeting can be off site if requested.

The employee raising concerns does not have to prove the allegation but they must demonstrate that there are sufficient grounds for concern.

Confidentiality will be maintained as far as is possible by Group Dianco or the respective entity of the group.

It is best to raise a concern openly, because that makes it easier for Group Dianco or the entity to follow it up. Group Dianco or the entity will not disclose the whistleblower's identity without their consent unless there are legal reasons that require them to do so.

This might be, for example, where their information is about a child or vulnerable adult who is at risk, or where there is a possible criminal offence. If this is the case, Group Dianco or the entity may have to tell the police or another official body, or if required to do so by a court.

Group Dianco or the entity will let the individual know if it has to do this and that this will identify them to another body.

Staff may, if they wish, disclose information anonymously. However, it should be noted that in such circumstances, Group Dianco or the entity may not be able to contact staff to discuss their concern or ask them for further information, nor give any feedback about any action it takes.

How Group Dianco will respond:

Any concern raised under this policy will be investigated thoroughly, promptly and confidentially.

Any approach to the responsible person of the Group Dianco entity will be treated with the strictest confidence and the member of staff's identity will not be disclosed without their prior consent. All members of staff will be treated with respect at all times and the person raising the concern will be thanked.

There may be a meeting with the member of staff raising the concern to ensure the Group Dianco entity understands exactly the particular worry.

Within five working days (and in any case no later than seven days) of a concern being raised, the entity responsible person will write to the member of staff setting out the following:

- Acknowledgement that the concern has been received, the date it has been received, whether the person who raised the concern has requested confidentiality, and a summary of the concern;
- Indicating how the matter will be dealt with and by whom and how they can be contacted;

- Telling the member of staff when an investigation has started or is to be started and if further assistance will be needed from them.
- The member of staff who raises the concern will be told how long to expect the investigation to take and will be kept up to date with its progress.

The matters raised may be investigated internally. Where it has not been possible to resolve the matter quickly (usually within a few days), someone suitably independent (such as a designated officer) and properly trained will carry out an investigation.

The investigation will be objective and evidence-based, and will produce a report that focuses on identifying and rectifying any issues, and learning lessons to prevent problems recurring.

The investigator may decide that the concern would be better looked at under another process, such as the grievance procedure or dignity at work procedure. If so, this will be discussed with the member of staff.

On conclusion of any investigation, and in any case within three months of the acknowledgement of receipt, the member of staff will be told the outcome of the investigation, or the progress made, and what Group Dianco and/or the entity has done, or proposes to do, about it. Wherever possible, Group Dianco and/or the entity will share the full investigation report with the member of staff who raised the concern (while respecting the confidentiality of others). If no action is to be taken, the reason for this will be explained.

If an individual is not satisfied with the response received and any subsequent action taken, they should put their concerns in writing to the Senior Management of Group Dianco, who will arrange any further investigation as they think appropriate. Senior Management of Group Dianco will send a written response to the individual concerned.

More serious disclosures may be referred to a competent external authority and may form the subject of an independent inquiry.

Record keeping and data protection:

Reports are recorded and stored securely, with access limited to the persons handling them, and are kept no longer than necessary. Personal data is processed in line with applicable data protection laws, including the EU General Data Protection Regulation for Dianco BV.

Harassment and victimisation:

Group Dianco understands that raising a concern can be difficult for staff, especially if they fear reprisal from those responsible for the malpractice. Group Dianco will not tolerate harassment and victimisation of anyone raising a concern, and there should be no impact on the continued employment and opportunities for future promotion or training of anyone raising a concern. Any such behaviour is a serious breach of our values as an organisation and, if upheld following investigation, could result in disciplinary action potentially leading to dismissal. This protection extends to persons who assist the whistleblower and to colleagues or relatives who could suffer retaliation.

Nor will Group Dianco tolerate any attempt to bully anyone into not raising any such concern. Any such behaviour is a breach of our values as an organisation and, if

upheld following investigation, could result in disciplinary action potentially leading to dismissal.

This policy encourages members of staff to put their name to their concerns. Concerns expressed anonymously are harder to follow up and to bring to an effective outcome.

If a member of staff makes an allegation in good faith, but the allegation is not confirmed by the investigation, no action will be taken against that member of staff. They will not be at risk of losing their job or suffering any form of reprisal as a result. Provided the member of staff is acting honestly, it does not matter if they are mistaken or if there is an innocent explanation for their concerns.

Reporting a concern to an external body:

This policy is intended to provide a route by which members of staff can raise concerns internally. However, if an employee is unhappy with the outcome of an investigation or if, for any reason they do not feel comfortable raising their concern internally, they are free to take the matter outside of the organisation to the competent authorities, including:

- **Belgium (Dianco BV):** the competent authorities designated under the Belgian Act of 28 November 2022 on the protection of persons reporting breaches in the private sector (transposing EU Directive 2019/1937), with the Federal Ombudsman acting as federal coordinator for external reports;
- **United Arab Emirates (Dianco DMCC):** the DMCC Authority, the UAE Ministry of Economy and Tourism (for anti-money laundering matters) and the UAE Financial Intelligence Unit;
- **Hong Kong (Dianco (HK) Ltd):** the Independent Commission Against Corruption (ICAC) for bribery and corruption, and the Customs and Excise Department for anti-money laundering matters concerning dealers in precious stones;
- **United States (Dianco Solitaire – New York):** the competent federal and New York State authorities, including the U.S. Department of the Treasury (FinCEN for anti-money laundering matters and OFAC for sanctions matters);
- **China, Botswana and Namibia:** the competent authorities under local law, including the protections of the Botswana Whistleblowing Act and the Namibian Whistleblower Protection Act.

As Group Dianco has entities in different countries, it is the responsibility of each entity to make sure that the staff member knows to whom to address their concern and has up-to-date contact details for the relevant authorities.