DIANCO

BRINGING DIAMONDS TO LIFE

GROUP DIANCO

Policy on Diversity and Inclusion

VERSION 2026

Background:

Group Dianco is an international diamond group with entities in Belgium, the United Arab Emirates, Hong Kong, China and the United States. Our people come from many nationalities, cultures, religions and generations, and we work every day with business partners from all over the world. We see this diversity as one of our strengths. Different perspectives make our decisions better, our relationships stronger and our group more resilient.

This policy builds on the commitments in the Group Dianco Policy on Human Rights and the Group Dianco Human Rights Commitment, which state that there must be equal opportunities and treatment for all employees, and that non-discrimination and inclusion are fundamental to our business.

Purpose:

The purpose of this policy is to set out how Group Dianco creates a workplace where every person is treated with dignity and respect, has equal access to opportunities, and feels able to contribute fully, whatever their background.

Scope:

This policy applies to all staff members, managers and directors of Group Dianco and its entities, including temporary staff, trainees and interns. It also applies to job applicants, and to how we treat customers, suppliers, visitors and other business partners. Where local law sets a higher standard than this policy, the local law applies.

Definitions:

- **Diversity** means the differences between people, including their background, experience, perspectives and personal characteristics.
- **Inclusion** means creating an environment in which those differences are respected and valued, and in which everyone can participate and progress.
- **Equal opportunity** means that decisions about people are based on merit, skills and performance, and not on personal characteristics unrelated to the job.

Our commitment:

Group Dianco does not tolerate discrimination, harassment or victimisation on the basis of race, colour, ethnicity, nationality or national origin, religion or belief, sex or gender, pregnancy or maternity, marital or family status, age, disability, sexual orientation, political opinion, union membership, or any other characteristic protected by applicable law.

This commitment applies at every stage of employment: recruitment, pay and benefits, training, promotion, work assignments, discipline and termination.

Fair recruitment and selection.

Vacancies are described by the skills and experience the role genuinely requires. We aim to reach a broad pool of candidates, assess applicants on objective criteria, and involve more than one person in hiring decisions where possible. Questions in interviews must relate to the job.

Equal pay and benefits.

Staff members doing equal work or work of equal value receive equal pay. Each entity reviews its pay and benefits regularly to identify and correct any unjustified differences, including between women and men.

Development and promotion.

Training, mentoring and promotion opportunities are open to all staff members on the basis of merit and potential. Managers are expected to support the development of every member of their team.

Gender equality.

The diamond and jewellery industry has historically been male-dominated, and Group Dianco wants to help change that. As a member of the Watch & Jewellery Initiative 2030, the group is committed to advancing gender equality and women's empowerment, both in our own entities and across our value chain. We actively encourage women to take up trading, technical and leadership roles.

Work-life balance and family responsibilities.

Group Dianco supports staff members with family and caring responsibilities. Where the business allows, entities will consider requests for flexible working arrangements fairly, and staff members will not be disadvantaged for taking leave to which they are entitled, including maternity, paternity and parental leave.

Religion, culture and language.

We respect the religious and cultural practices of our staff members. Where reasonably possible, entities will accommodate religious observance, including prayer times, religious holidays and fasting periods, and dietary needs at company events. We expect staff members to show the same respect to one another.

Disability and accessibility.

Group Dianco will make reasonable adjustments to the workplace, equipment and working arrangements so that staff members and applicants with a disability can work and progress on an equal footing.

Respectful workplace.

Harassment of any kind, including sexual harassment, racial harassment, bullying, offensive jokes or comments, and exclusion from work activities, is not acceptable. This applies in the office, at trade shows, during business travel and at work-related events, as well as in online and written communication.

Our business partners:

In line with the Group Dianco Global Standards for Business Partners and the Responsible Sourcing Policy, we expect our suppliers and business partners not to discriminate and to provide equal opportunities to their own employees. Group Dianco will favour business partners who share this commitment. We also treat all customers and business partners fairly and without discrimination.

Roles and responsibilities:

- **Senior management of Group Dianco** is responsible for this policy, sets the direction on diversity and inclusion, and reviews progress annually.
- **The management of each entity** is responsible for applying this policy locally, including in recruitment, pay and promotion decisions, and for making sure all staff members know about it.
- **Managers** lead by example, make fair decisions, and act promptly when they become aware of discrimination or harassment.
- **All staff members** are expected to treat colleagues, customers and business partners with respect, and to raise concerns when they see behaviour that goes against this policy.

Training and awareness:

All new staff members are informed of this policy when they join. Staff members and managers receive training on equal opportunity, respectful behaviour and preventing harassment as part of the group's annual training on its policies and procedures.

Measuring progress:

Each entity keeps basic workforce information, such as the gender balance of staff, managers and new hires, and the outcomes of pay reviews. Because several of our entities have a small number of staff, this information is reported in a way that protects the privacy of individuals, and only in line with applicable data protection laws. Progress is reported to senior management of Group Dianco and summarised in the Group Dianco Business Responsibility annual report.

Raising concerns:

Any staff member who believes they have been discriminated against or harassed, or who witnesses such behaviour, is encouraged to raise it with their manager, the management of their entity, or the senior management of Group Dianco. Concerns can also be raised through the Group Dianco Complaints & Grievances Policy, the Human Rights Complaint Form or the Whistleblowing Policy, including anonymously.

All concerns will be taken seriously, handled confidentially and investigated promptly. No one will suffer any disadvantage for raising a concern in good faith. Discrimination, harassment or retaliation that is confirmed after investigation will lead to disciplinary action, which may include dismissal.

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.