

RJC Annual Review Meeting

The annual review of the implementation of the Code of Conduct and Responsible Business Practices takes place in the form of a meeting of the Managing Director and local management who confirm review and discussion of each of the points in the table below and record corrective actions required. The annual review meeting has been conducted at EURODIAMONDS BV on May 1st 2025.

Practice	Reviewed	Corrective action required
Upholding the Law		
Are there areas where we are aware of inadequate compliance with the law?	No	
Have we checked with our legal advisors to ensure we are up to date with laws and regulations?	Yes	
Are there changes in legislation that we need to adapt our practices to meet?	No	
Are there new legal requirements that our employees need to be informed of?	No	
Aligning and Promoting Responsible Industry Practice		
Have we maintained our membership of RJC?	Yes	
Have we followed the policies and guidelines of the WCD/RJC/SOW/Kimberley Process?	Yes	
Is there anything more we should do to promote responsible industry practices?	No	
Supporting Human Rights in our Supply Chain		
Did we source from any Artisanal or Small-Scale Mining (ASM) operation or area?	No	
Did we perform a due diligence check on Human Rights issues with all our stakeholders?	Yes	
Were any red flags raised in the process?	No	
Did we implement a Human Rights Due Diligence review?	Yes	
Were any adverse Human Rights impacts observed for the past year?	No	
Is our workplace free of discrimination and harassment?	Yes	
Do we comply with all labor laws?	Yes	
Have we conducted a safety risk assessment in the past year?	Yes	
Have we compensated our employees in line with our terms and conditions?	Yes	
Have we invested in our employees' development?	Yes	
Have we ensured we do not employ children or forced labor in our operations?	Yes	

Standing against Corruption and Bribery		
Have we assessed our business for corruption and bribery risks?	Yes	
Are we sure we are fully compliant with all relevant legislation?	Yes	
Have we appropriately dealt with any incidents of corruption or bribery that occurred?	Yes	
Have we maintained appropriate financial records of all our transactions and audited our inventories in line with policy?	Yes	
Security		
Were the necessary security measures maintained in our offices?	Yes	
Health & Safety		
Have the necessary systems, procedures and tools been implemented and or/updated to safeguard a healthy and safe working environment for all?	Yes	
Have there been any H&S issues during the last year?	No	
Anti-Money Laundering		
Have we performed due diligence checks on new customers and suppliers?	Yes	
Have we ensured all our customer and supplier transactions are in line with regulated and defined procedures?	Yes	
Did we file and keep on record proper KYC/Annual AML report documentation?	Yes	
Did at least 1 Director follow the yearly AML Training Course	Yes	
Provenance Claims		
Are all provenance claims properly listed and are we confident that we can back up all claims with written statements by our suppliers?	Yes	
Supply Chain Due Diligence		
Have we sent out our Supply Chain Policy to all our suppliers?	Yes	
Have we sent out and received the Supply Chain Due Diligence Questionnaire to/from ALL our suppliers?	Yes	
Were there any red flag situations with any of our suppliers?	No	
If so, has appropriate action been undertaken?	NA	
Are there any changes to our supply chain mapping?	No	
Respecting the Environment		
Have we minimized our use of electricity, water, fuel and taken care to minimize waste?	Yes	
Have we recycled our paper and (electronic) waste?	Yes	
Have we avoided business travel unless absolutely necessary?	Yes	
Risk Management		
Have we conducted a business risk assessment and taken appropriate mitigation action?	Yes	
Did we put in place procedures to avoid purchasing and/or selling any goods from countries on sanction lists?	Yes	

Communication of our Code of Conduct		
Have we informed all new employees of our Code of Conduct?	No	Business/Supplier Code of Conduct under review.
Have we included the Code of Conduct in contracts with new suppliers?	No	
Have we encouraged suppliers and partners to align their practices with this Code of Conduct?	No	
Reporting of Breaches of our Code of Conduct		
Have we collaborated effectively in resolving any reported breaches of our Code of Conduct?	Yes	
Did we publicly report on important issues like Human Rights, Supply Chain Due Diligence and overall commitment?	Yes	
Training of Personnel		
Have all staff and personnel been sufficiently trained in all relevant aspects?	Yes	

Antwerp, (effective from) May 1st, 2025

 Mr. Uri Brief
 Managing Director EURODIAMONDS BV