DAEMS GROUP

BUSINESS PARTNER CODE OF CONDUCT

MARCH 2026

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1. INTRODUCTION

DAEMS GROUP is committed to socially and environmentally responsible corporate governance. We take accountability for our products, services, decisions, and actions and expect the same behavior from our business partners. We require all our employees to uphold these principles of social, environmental, and ethical conduct, integrating them into our company culture.

The present Business Partner Code of Conduct (hereinafter the "Code of conduct" is based on the values of social responsibility, environmental protection, ethics and business integrity.

We continuously strive to enhance the sustainability of our business activities. Together with our business partners, we aim to contribute to these efforts through an integrated approach.

The Code of Conduct defines the principles and practices that the business partners must commit to respecting and ensuring compliance with.

2. KEY REGULATIONS AND STANDARDS

The business partners of Daems Group agree to comply with this Code's requirements and with principles from various national and international laws, such as the **Declaration on Fundamental Principles and Rights at Work** (e.g., the right to collective bargaining, the elimination of forced or compulsory labor, the abolition of child labor, and the elimination of discrimination in employment), the various conventions from the **International Labour Organisation** (ILO), the **UN Guiding Principles on Business and Human Rights**, the **Universal Declaration of Human Rights**, the ten principles of the **UN Global Compact**, and the **OECD Guidelines on Responsible Business Conduct**, the **OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas**.

Our business partners agree to implement these commitments and adhere to the principles and requirements of the **Code of Practice** (COP) of the Responsible Jewellery Council (RJC). Daems Group is a Certified Member of RJC, a standards-setting organization dedicated to advancing ethical, human rights, social, and environmental practices throughout the jewelry supply chain involving diamonds, gold, and platinum group metals. Daems Group has been certified ISO 9001 since 2025.

Corporate responsibility has become increasingly important in assessing a company's overall performance and its ability to operate effectively. It entails making a positive contribution to economic, environmental, and social progress, often by creating opportunities and managing business risks. Corporate responsibility requires companies to take measures to prevent and address any adverse consequences of their activities.

3. SOCIAL RESPONSIBLE BUSINESS PRINCIPLES

The business partner must provide a safe and healthy working environment, taking necessary precautions for the health and safety of their employees, customers, contractors, and any third parties affected by their operations.

Key areas of focus include:

3.1. PROHIBITION OF FORCED LABOUR

Daems Group has zero tolerance for forced labour, slave labour, modern slavery, or bonded labour. All employees must work without the threat of punishment and have the right to quit their employment at any time. Practices such as withholding identity documents, requiring deposits, or any other form of coercion are strictly prohibited. The business partner must ensure the prohibition of forced labour as defined in the ILO convention no.29.

3.2. PROHIBITION OF CHILD LABOUR

The business partner shall commit to forbidding child labour, notably in compliance with the ILO minimum age convention. The employment of children under 16 is prohibited, with strict regulations for those under 18, including bans on night work, overtime, and hazardous tasks. Apprenticeships and internships must also respect these standards. The business partners must prevent any form of child labour as defined in the ILO convention no. 182 and no. 138.

3.3. WAGES AND WORKING HOURS

Working hours must comply with applicable laws and ILO convention no.1. Overtime must be voluntary, and the business partner must respect employees' rest and leisure time. The work week, including overtime, shall not exceed 60 hours.

Wages must meet or exceed the national or customary minimum wage for the sector of industry, be paid regularly and on time, and comply with national laws. The business partner shall commit to documenting all salary payments, including overtime and other forms of compensation. Wage deductions as punitive measures are prohibited, and fair wages must be ensured. The business partner shall comply with the ILO convention no. 131.

3.4. PROHIBITION OF WORKPLACE VIOLENCE AND HARASSMENT

Daems Group is committed to a safe and respectful work environment. Workplace violence and harassment are strictly prohibited on company premises, during business travel, and while conducting business remotely. Any violent or harassing behavior, direct or indirect, physical or verbal, may result in disciplinary action or legal consequences. All employees and business partners are required to prevent and report violent or harassing behavior.

3.5. EQUAL TREATMENT AND ANTI-DISCRIMINATION

All employees must be treated equally and fairly. Business partners must ensure equal pay for equal work, opportunities for advancement, and access to training, regardless of age, ethnicity, religion, gender, nationality, political affiliation, or social origin. The business partner shall not tolerate any discrimination in the hiring process.

3.6. LIBERTY OF ASSOCIATION

Daems Group and the business partners acknowledge and respect the right of freedom of association of their employees. Employees are free to elect employee representatives and have the right to collective bargaining. The elected representatives must have the right to openly communicate their concerns with respect to working conditions. The employee representatives shall not be subject to practices of discrimination, intimidation, harassment or retribution due to their union membership. To this end, Daems Group has implemented the employee participation model through the DG Committee.

Business partners must comply with regulations prohibiting illegal or undeclared employment.

3.7. HEALTH AND SAFETY

Business partners are responsible for a safe and healthy working environment. This includes implementing preventive safety measures to avoid accidents and ensuring employees are regularly informed and trained in health and safety practices. Safety data sheets and personal protective equipment must be provided as needed. At least once a year, all employees must undergo safety instruction in which the rescue routes are shown and trained.

Business partners shall carry out a risk assessment of the health and safety of the employees in the working environment. Action to eliminate risks or to reduce risks must be implemented.

4. GOVERNANCE RESPONSIBLE BUSINESS PRINCIPLES

4.1. HUMAN RIGHTS

Business partners must respect the human rights, as defined by the United Nations, at all times and in all places. A reasonable effort of diligence to identify, prevent or mitigate risks and impacts shall be exercised.

4.2. CORRUPTION AND BRIBERY

Daems Group upholds the highest standards of integrity. Business partners must have zero tolerance for corruption, money laundering, embezzlement, bribery, and comply with anti-corruption laws. Gifts or benefits intended to gain advantage are prohibited.

4.3. AML AND FINANCING OF TERRORISM

Business partners handling gold, PGM-group metals, diamonds, and colored stones are required to complete Know Your Counterparty (KYC) information to prevent involvement in terrorism financing, money laundering, or illegal activities.

4.4. TRANSPARENCY AND TRACEABILITY

Business partners shall ensure transparency with the ability to identify the name and location of all actors in the supply chain, right back to the origin of the raw materials. Traceability is defined as the process by which the business partners traces materials and products throughout the supply chain.

The suppliers of natural diamonds shall commit to complying with the **Kimberley Process** and with the **World Diamond Council System of Warranties**.

4.5. COMPETITION AND CONFLICTS OF INTEREST

Daems Group provides transparent information about products, including traceability systems, to guarantee product disclosures. Business partners are required to uphold fair business practices and comply with antitrust laws.

Business partners must avoid actual and potential conflicts of interest.

4.6. DATA PROTECTION AND PRIVACY

Private information and data must be protected in full compliance with data protection regulations, such as the General Data Protection Regulation (GDPR). Intellectual property rights must be respected, and knowledge transfer must be secure.

4.7. WHISTLEBLOWERS

Business partners commit to making available to their partners and employees a procedure for raising alerts. The whistleblower (internal and external) must be protected against any form of retribution. The reporting mechanism ensures anonymity while avoiding bad faith denunciations.

5. ENVIRONMENTAL RESPONSIBLE BUSINESS PRINCIPLES

5.1. RESPONSIBLE RESOURCE MANAGEMENT

Daems Group is committed to protecting natural resources, biodiversity, and ecosystems, and to preventing environmental pollution through continuous improvements in our environmental management system.

Business partners must work to protect natural resources, prevent pollution, and minimize negative environmental impacts from soil, water, noise, and air pollution. The business partner takes all possible measures to minimize environmental risks and seek to have a positive impact on biodiversity.

The business partners must commit to complying with all applicable environmental laws and regulations, including the **Reach Regulation** of dangerous chemicals.

5.2. RESPONSIBLE WASTE MANAGEMENT

Daems Group follows a waste management plan based on reducing, reusing, and recycling materials. Business partners are expected to follow regulatory guidelines in handling, storing, and recycling waste.

Business partners shall implement an effective waste management system to monitor all types of waste generated and commit to reducing and optimizing their packaging by avoiding materials that are difficult to recycle.

5.3. RESPONSIBLE ENERGY CONSUMPTION

Daems Group maximizes renewable energy use, with a photovoltaic system producing significant energy on-site. In addition, Daems Group purchases 100% European green energy.

Business partners are encouraged to adopt similar measures to reduce energy consumption and maximize renewable energy use.

5.4. CARBON FOOTPRINT REDUCTION

Daems Group commit to preparing an annual ESG-report compliant with the **GreenHouse Gas** GHG-Protocol, including analysis of scope 1, 2 and 3. Business partners shall implement an action plan to reducing their GHG-emissions, in line with the **Paris Agreement**.

6. COMPLIANCE

Business partners must comply with this Code of Conduct and will implement the principles outlined in this Code of Conduct. Adequate management systems, policies, procedures, and training must be in place to ensure ongoing compliance. Daems Group reserves the right to monitor compliance with this Code of Conduct through evaluations conducted by Daems Group or a qualified third party. Business partners must provide documentation or information upon request to demonstrate compliance.

Kessel, the 17th of March 2026



Daems Giovanni, CEO Daems Group BV