RESPONSIBLE SOURCING POLICY FOR MINERAL SUPPLY CHAINS

At **Daems Group BV,** we are committed to conducting our business responsibly in line with the principles and values of the RJC standards. This ethical approach includes taking all possible measures to ensure that the materials we use in our products are sourced from businesses that follow the law and respect the rights of workers and the communities in which they operate.

To this end, Daems Group BV implements this policy on responsible sourcing throughout our supply chain of diamonds, gold, silver, platinum group metals, and colored gemstones (hereinafter referred to as our raw material supply chains). This policy is intended to affirm our commitment to respect human rights, avoid contributing to finance conflicts and comply with all applicable laws, regulations and national and international conventions, relevant UN sanctions and resolutions.

OUR COMMITMENTS

Daems Group BV is a certified member of the Responsible Jewellery Council, which assures, through an independent third-party verification, that the Daems Group BV factory is properly managed, and that the relevant raw materials listed above and used in its products are responsibly sourced from mining to retail.

Daems Group BV commits to implementing the framework of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict- Affected and High-Risk Areas. To that end, we work with our business partners and suppliers:

- to identify whether we source raw materials that originate in or are traded through Conflict-Affected or High-Risk Areas (CAHRAs)

- to implement the OECD five-step framework as a management process for risk-based Due Diligence for Responsible Supply Chains of Minerals from CAHRAs

- to establish a system to continually monitor the supply chains and the due diligence efforts of our suppliers for information relevant to the sourcing of raw materials from CAHRAs.

1. **Serious abuses associated with the extraction, transport or trade of raw materials sourced from CAHRAs**

   Daems Group BV will neither tolerate nor profit from, contribute to, assist or facilitate:

   i) any forms of torture, cruel, inhuman and degrading treatment;

   ii) any forms of forced or compulsory labour (COP20),

   iii) the worst forms of child labour (COP19);

   iv) other gross human rights violations and abuses such as widespread sexual violence (COP6);

   v) war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

   We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses as described above.

2. **Direct or indirect support to non-state armed groups**

   Daems Group BV will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of raw materials.

   We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups.

3. **Public or private security forces**

   We strongly emphasize that the role of public or private security forces is to ensure the security of employees, facilities, equipment and property in accordance with the rule of law, including laws guaranteeing human rights. We will not provide direct or indirect support to public or private security forces that commit serious violations or act illegally.

   i) We agree to eliminate any direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders.

ii) We recognize that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.

iii) Where we or any company in our supply chain contract public or private security forces, we commit to or we will require that such security forces will be engaged in accordance with the Voluntary Principles on Security and Human Rights. In particular, we will support or take steps, to adopt screening policies to ensure that individuals or units of security forces that are known to have been responsible for gross human rights abuses will not be hired.

iv) We will support efforts, or take steps, to engage with central or local authorities, international organizations and civil society organizations to contribute to workable solutions on how transparency, proportionality and accountability in payments made to public security forces for the provision of security could be improved.

We will support efforts, or take steps, to engage with local authorities, international organizations and civil society organizations to avoid or minimize the exposure of vulnerable groups, in particular, artisanal miners where minerals in the supply chain are extracted through artisanal or small-scale mining, to adverse impacts associated with the presence of security forces, public or private, on mine sites.

In accordance with the specific position of the company in the supply chain, we will immediately devise, adopt and implement a risk management plan with upstream suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces, as identified above, where we identify that such a reasonable risk exists. In such cases, we will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation within six months from the adoption of the risk management plan.

4. Bribery and fraudulent misrepresentation of the origin of raw materials

Daems Group BV will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of raw materials, to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of raw materials.

5. **Money laundering and financing of terrorism**
   Daems Group BV will support efforts, or take steps, to contribute to the effective elimination of money laundering and financing of terrorism where we identify a reasonable risk of money-laundering or financing of terrorism resulting from, or connected to, the extraction, trade, handling, transport or export of raw materials derived from the illegal taxation or extortion of raw materials at points of access to mine sites, along transportation routes or at points where raw materials are traded by upstream suppliers.

6. **The payment of taxes, fees and royalties due to governments**
   Daems Group BV will ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas are paid to governments and, in accordance with the company's position in the supply chain, we commit to disclose such payments in accordance with the principles set forth under the Extractive Industry Transparency Initiative (EITI).

   Regarding risk management of bribery and fraudulent misrepresentation of the origin of raw materials, money-laundering and payment of taxes, fees and royalties to governments: in accordance with the specific position of the company in the supply chain, we commit to engage with suppliers, central or local governmental authorities, international organizations, civil society and affected third parties, as appropriate, to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measureable steps taken in reasonable timescales. We will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation.

7. **Gold**
   Daems Group BV commits to implementing the OECD Due Diligence Guidance Supplement on Gold in our operations and supply chains and we require our business partners and suppliers in the gold and precious metal supply chain to implement the same Guidance.

8. **Diamond Sourcing and Kimberly Process**
   Daems Group BV only buys or sells diamonds that are fully compliant with the Kimberley Process Certification and we comply with the World Diamond Council (WDC) System of Warranties (SoW). We require our business partners and suppliers involved in the international trade of rough diamonds to comply with the Kimberley Process Certification Scheme (KPCS) requirements and recommendations and to comply with all applicable laws relating to the international trade of diamonds in the countries where they operate. We require our business partners and suppliers in the diamond supply chain, including buying and selling diamonds, to implement the World Diamond Council (WDC) System of Warranties (SoW) Guidelines.

9. **Coloured Gemstone Sourcing**
   We are committed to implementing the due diligence on the colored gemstones supply chain in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAs. We require our business partners and suppliers in the coloured gemstone supply chain, including buying and selling coloured gemstones, to implement the due diligence tools of the RJC Code of Practices where that applies to coloured gemstones.

SCOPE

In order to implement the commitment made in this document, Daems Group BV will set up appropriate due diligence processes, at the supply chain level, through the relevant functions involved, to the extent of their respective areas of responsibility. To support this process, Daems Group BV is committed to building the awareness and knowledge of its employees and workers and to promoting the commitments of this policy across its value chain. This policy is applicable to all business activities carried out by Daems Group BV and its subcontractors worldwide.

GRIEVANCE

We allow both internal and external stakeholders to speak up at any time regarding concerns in the jewelry supply chain or our origin disclosures and have provided an email address for this purpose on our website (rjc@daemsgroup.com). Any attempt to prevent or suppress concerns or complaints will be considered a violation of this policy and will be punished accordingly.

Any Daems Group BV employee or external stakeholder who becomes aware of violations or has any concerns regarding impacts that may arise from Daems Group BV's direct and indirect behaviors under this policy is invited to raise their concerns and/or ask for guidance. We will follow up on all grievances or guidance related notifications using our grievance procedures.

Daems Group BV ensures that no disciplinary sanction or any direct or indirect retaliatory measure is taken against persons who have made use of these channels in good faith, even if the facts subsequently prove to be inaccurate or unfounded and/or do not give rise to any proceedings or sanctions.

RELATED POLICIES AND DOCUMENTS

International references and voluntary standards:

OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas; RJC Code of Practices; System of Warranties Guidelines (World Diamond Council);

Daems Group BV related policies and documents: Policy on Workplace Violence and Harassment; Responsible Business Policy; Suppliers Risk Management Procedure

COMMUNICATION

This Responsible Sourcing Policy is communicated to all employees, suppliers and customers and it is publicly available to share our values and commitments with external stakeholders as well as contribute to spread the culture of Responsible Sourcing.

The Supply Chain Policy on the company website www.daemsgroup.com supersedes all previous versions.

All questions related to the origins, sources or practices around the use of the minerals in our production and supply chain can be submitted to rjc@daemsgroup.com.

RESPONSIBILITY AND SIGNATURE SECTION

Overall responsibility for this Policy resides with the CEO of Daems Group BV.

Signed on January 2026 by the Chief Executive Officer, Daems Giovanni.

