

Reporting Policy

1. PURPOSE:

The purpose of this policy is to ensure that RACHMINOV DIAMONDS 1891 (EUROPE) BV maintains awareness of its obligations to report formally, publicly and on a regular basis on its compliance findings to its stakeholders.

2. POLICY:

RACHMINOV undertakes to communicate on a regular basis to stakeholders on our business practices relevant to overall compliance or sustainability efforts; whether in the framework of the RJC programme or other (i.e. BPP/PI reporting).

In order to fulfil its reporting commitments, the following minimum procedures will be observed:

- The annual date for reporting is fixed;
- Prior to the annual reporting date, a sustainability meeting will be convened which will address the following agenda:
 - o Review of issues on Supply Chain Due Diligence, Human Rights and other minimum reporting requirements;
 - o Outstanding issues from external or internal audit(s);
 - o New issues to be considered with respect to sustainability;
 - o Any other sustainability issues that might arise

The meeting and the agenda will be prepared by the Operations Manager, the Marketing Director and the CEO. Meeting participants will be chosen in function of their competence relevant to the compliance issue.

The report issued after the meeting will be approved by the CEO and published to be available to the Company's stakeholders.

3. RESPONSIBILITY FOR THE POLICY:

The CEO.

4. REPORTING REQUIREMENTS:

Breaches of this policy will be reported to the CEO and will be part of the yearly reporting.

Tel Aviv, (effective) June 15th 2026

Eden Rachminov, Founder and CEO
RACHMINOV DIAMONDS 1891 (EUROPE) BV

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 Operations Manager 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 RACHMINOV DIAMONDS 1891 (EUROPE) BV on June 15th 2026

Practice	Reviewed	Corrective action required
Upholding the Law		
Are there areas where we are aware of inadequate compliance with the law? Have we checked with our legal advisors to ensure we are up to date with laws and regulations? Are there changes in legislation that we need to adapt our practices to meet? Are there new legal requirements that our employees need to be informed of?	Yes	
Aligning and Promoting Responsible Industry Practice		
Have we maintained our membership of RJC? Have we followed the policies and guidelines of the Israeli Diamond Exchange? Is there anything more we should do to promote responsible industry practices?	Yes	
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 suppliers in line with the relevant OECD Framework on Supply Chains?	Yes	
Were any red flags raised in the process?	No	
Did we implement a Human Rights Due Diligence review? Were any adverse Human Rights impacts observed for the past year?	Yes No	
Is our workplace free of discrimination and harassment? Do we comply with all labor laws? Have we conducted a safety risk assessment in the past three months? Have we compensated our employees in line with our terms and conditions? Have we invested in our employees' development? 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? Are we sure we are fully compliant with all relevant legislation? Have we appropriately dealt with any incidents of corruption or bribery that occurred? 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? Have we ensured all our customer transactions are in line with regulated and defined procedures?	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	
Respecting the Environment		
Have we minimized our use of electricity, water, fuel and taken care to minimize waste? Have we recycled our paper and electronic waste? Have we avoided business travel unless absolutely necessary?	Yes	
Risk Management		
Have we conducted a business risk assessment and taken appropriate mitigation action?	Yes	
Communication of this Code of Conduct		
Have we informed all new employees of our Code of Conduct? Have we included the Code of Conduct in contracts with new suppliers? How have we encouraged suppliers and partners to align their practices with this Code of Conduct?	Yes	
Reporting of Breaches of this Code of Conduct		
Have we collaborated effectively in resolving any reported breaches of our Code of Conduct?	Yes	
Training of Personnel		
Have all staff and personnel been sufficiently trained in all relevant aspects?	Yes	

Tel Aviv, (effective) June 15th 2026

Eden Rachminov, Founder and CEO
RACHMINOV DIAMONDS 1891 (ISRAEL LTD)

Local Management

