

Addendum to the Supply Chain Policy: Procedures on Supply Chain Due Diligence 10/11/2021

Considerations:

GEMASIA BV considers its obligations towards COP7 as a process, which may need continuous monitoring over a longer period to achieve the best possible results, commensurate with the company's downstream position and size in the supply-chain.

The latter implies that information on supply-chains – especially beyond the first direct suppliers identifiable by GEMASIA BV - depends highly on the gracious cooperation of its suppliers. Considering the confidential nature of much of the information required from suppliers, some resistance to complete information-disclosure may be expected and must be incorporated in the process.

As such, we will strive to document the process to the best of our abilities and communicate whenever appropriate on progress.

Procedures:

In order to achieve full compliance with RJC COP 7, the following procedures will apply:

1) GEMASIA BV will send a letter to all existing suppliers informing them about the Company's Supply Chain Policy under COP7. The letter is a clear invitation for cooperation to fulfil GEMASIA BV's obligations.

2) The letter will contain the following 2 attachments:

- The Company's Supply Chain Policy
- The Company's information Form for Suppliers

Suppliers are kindly requested to fill in the Information form and to return it, signed and dated to GEMASIA BV.

3) If needed, the Company will follow up with a personal phone-call to check if the requirements are clear and to see how we can be of any assistance.

In any case, and within a period of 6 months after sending the policy and the Information request form, GEMASIA BV will put its best endeavours in obtaining a clear and timely answer from its suppliers until 100% completion is obtained.

4) After reception of the information questionnaire(s), GEMASIA BV will analyse the results and determine whether there are any issues in its supply-chain, and will take appropriate action, specifically when a 'red-flag' situation may arise.

5) 'Red Flag' situations may arise when we think suppliers (directly or indirectly) may have supplied us with diamonds from 'CAHRA's' as defined in the OECD Guidelines on Conflict Affected and High-Risk Areas.

In the absence of any clear, definite and regularly updated guidelines from either supranational or national instances (UN, EU, Belgian Government) or sector-related instances who have the authority to deal with this issue (WDC, AWDC, WFDB), we define CAHRA's as those diamond-related countries and/or regions which are on the 'black list' of the Kimberley Process, in the actual case this concerns only certain regions from CAR (Central African Republic).

The company is ready to re-assess its criteria for determining CAHRA's if and when credible instances provide the necessary guidance.

6) For new suppliers, GEMASIA BV will implement step 1 to 4 at the start of the relationship, and will monitor the outcome as part of its global process.

7) GEMASIA BV will keep records on each supplier with regards to COP7 and do regular checks on whether suppliers comply on an ongoing basis.

8) In its contacts with its customers, GEMASIA BV will also inform them about its Supply Chain Policy and the customer's ability to raise questions and grievances on this subject. A Grievance mechanism and form is already installed and will be reviewed on a yearly basis.

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