

Supply Chain Due Diligence Reporting 2021

Preamble:

GEMASIA BV has aligned its Supply Chain Due Diligence communication and reporting on RJC's Guidance for this subject (p. 65 of RJC COP 2019 Guidance Document, table 7.5.). As a result, this document recaps the reporting requirements for Tier 2 and downstream companies (GEMASIA BV's position in the diamond supply chain).

Reporting:

1. Management Systems:

GEMASIA BV has created a Supply Chain Policy document which is available at request on info@gemasiagroup.com. The Management responsibility for the due diligence programme has been assigned to GEMASIA BV's Managing Director, and adequate record-keeping systems and processes for information collection have been installed as per the Company's procedures for this subject.

2. Risk Assessment:

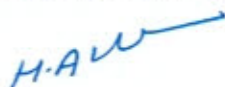
In preparation of its RJC Audit, GEMASIA BV has engaged with all its suppliers by sending them its Supply Chain Policy and a Due Diligence Questionnaire, both accompanied by an explanatory letter on RJC's COP 7 and the Company's obligations in this respect. To date, 49% of suppliers have sent this questionnaire back, and the Company strives for 100% completion of supplier-response within 6 months.

To date, no risks (neither actual or potential) have been identified, therefore, no remediation activity has been required.

Response:

To date, no specific risks have been identified in our supply chain, as such, no specific extra steps needed to be undertaken by the Company to manage risks, monitor and track performance of risk mitigation or to follow up any specific risk-areas.

Antwerp, November 10th, 2021



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