

DIACORE

THE DIACORE HUMAN RIGHTS POLICY

1. OBJECTIVE OF THE POLICY

The objective of this policy is to ensure that the Diacore Group of Companies (“Diacore”) demonstrates that it is committed to the principles of human rights, and supports, promotes, respects, and protects the fundamental human rights expressed in the Universal Declaration of Human Rights, the UN Global Impact, relevant ILO Conventions, and national legislation.

2. COMMITMENT

- 2.1. From the broad perspective of Diacore's operations, human rights are an overarching area of policy linked to several specific related policies including equal opportunities, freedom of association, child labour, forced labour, non-discrimination, non-retaliation and working conditions. These will each be dealt with briefly in the policy below. However, it should be noted that Diacore has separate policies in place for these topics to ensure strict compliance.
- 2.2. Diacore is committed to the principles of human rights and does not source diamonds from Conflict-Affected areas. It is committed to respecting the human rights of all and any people that it encounters (which includes but is not limited to all its employees, suppliers, customers, and all communities that it encounters).
- 2.3. Diacore is committed to identifying the main human rights issues it faces and implementing specific and appropriate policies to address such issues where applicable and ultimately, ensuring immediate remediation if any adverse Human Rights impacts are caused or contributed to.
- 2.4. Diacore will comply with national and, where appropriate, international legislation and regulations with respect to human rights and in particular, the UN Guiding Principles on Business and Human Rights.

3. HUMAN RIGHTS KEY PRINCIPLES

All workers will be trained on the Human Rights Policy and will be fully informed on human rights issues that impact them, which could include (but not necessarily be limited to) human trafficking, harassment, discrimination and physical, sexual, racial, religious, psychological, verbal or any other form of harassment. Where appropriate and necessary, Diacore will work with the relevant interested parties to understand local human rights issues and develop shared responses. Diacore is guided by the following key principles:

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3.1. NON-DISCRIMINATION AND EQUAL OPPORTUNITY

Diacore is committed to the principles of equality and non-discrimination and to providing a workplace that is free from discrimination and promotes equal opportunity for all employees, workers, and stakeholders. Decisions relating to recruitment, employment, training, promotion, remuneration, and termination are made based on merit, qualifications, and business needs, without regard to race, colour, gender, sex, pregnancy, marital status, ethnic or social origin, nationality, disability, age, religion, belief, culture, language, sexual orientation, gender identity, or any other status protected by applicable law. Diacore does not tolerate any form of unfair discrimination, harassment, or victimization and is committed to fostering an inclusive environment where all individuals are treated with dignity, fairness, and respect. Notwithstanding the above, Diacore will support any national legislation that encourages or imposes positive-discrimination or affirmative action obligations, economic advancement and/or rights of various categories of workers.

3.2. FORCED LABOUR AND HUMAN TRAFFICKING

Diacore is committed to the principles of human rights and freedom of movement. Diacore strictly prohibits all forms of forced, bonded, or compulsory labour, as well as human trafficking in any part of its operations and supply chains. Diacore is committed to ensure that all workers have the freedom to enter into and terminate employment voluntarily, in accordance with their employment contracts and applicable laws and will never be required to lodge deposits or identity papers when they commence employment.

3.3. CHILD LABOUR

Diacore prohibits the employment of children below the minimum legal working age and does not engage in or support any form of child slavery, debt bondage, trafficking of children, forced child labour or use of children in armed conflict. Diacore has adopted the definition of 'Child Labour' as set out in the United Nations International Labour Organisation Minimum Age Convention (138).

3.4. FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Workers have the right to form or join (or not join) lawful and registered trade unions or Worker representative bodies of their own choice without fear of coercion or retaliation. Diacore will recognize the existence, membership and lawful activities of lawful and registered trade unions or worker representative bodies, and worker representatives will be given reasonable access to Diacore's premises to carry out their responsibilities/functions. The terms of Collective bargaining agreements will be adhered to subject to national legislation.

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3.5. HARRASSMENT AND BULLYING

Diacore prohibits any form of physical, verbal, sexual, or psychological abuse or harassment including but not limited to bullying; corporal punishment; harsh or degrading treatment; gender-based violence; sexual or physical harassment; mental, physical, verbal or sexual abuse; retaliation; coercion; and intimidation. Both direct and indirect harassment in any form is not acceptable in workplace facilities. Diacore shall ensure that employees are treated with dignity and respect and are not subjected to harassment or violence, or threatened with these towards themselves, their family or colleagues.

3.6. FAIR WAGES AND WORKING HOURS

Across the group, Diacore ensures that wages and benefits paid always meet or exceed the legal national legal standard or the collective bargaining agreement. Working hours, overtime, and rest periods shall always comply with applicable laws and never exceed the national limit.

3.7. SAFE AND HEALTHY WORKING CONDITIONS

Diacore provides a safe and healthy workplace for all employees and is committed to preventing work-related injuries, illnesses, and environmental incidents. Our documented Health and safety Management System provides the framework for identifying, managing, and mitigating health, safety, and environmental risks across the Group whilst ensuring compliance with all applicable health and safety legislation and industry standards. Diacore is continually improving health and safety performance through monitoring, training, and risk assessments.

3.8. PRIVACY AND DATA PROTECTION

Diacore respects the privacy and personal data of employees, contractors, customers, and other stakeholders. Personal data shall only be collected, processed, stored, and shared only in accordance with applicable laws and regulations, including data protection legislation in relevant jurisdictions. Any data breaches or unauthorized disclosures must be reported promptly and remediated according to established procedures.

3.9. SECURITY

Suitable arrangements are in place to ensure the security of all workers and facilities. All offices are monitored by CCTV camera surveillance. Employees are fully aware of and informed of the cameras which are not used in areas of privacy such as bathrooms.

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Security personnel receive appropriate training on policies and/or procedures concerning all aspects of human rights relevant to its operations. Strict compliance with security policies must be adhered to particularly when security engage in searches (both personal and of property.) Diacore will only use armed security personnel when there is no other suitable alternative. All relevant circumstances prevailing will be considered.

3.10. NON-RETALIATION

Diacore ensures that anyone reporting human rights concerns, grievances, or potential violations is protected from retaliation. There will be no adverse work-related consequences against a person who, in good faith, discloses information about a situation or type of conduct that he/she feels to be unethical, illegal, or potentially illegal. All forms of retaliatory action are prohibited including but not limited to dismissal, demotion, threats or intimidation, coercion, harassment and/or discrimination.

Diacore fosters a safe environment for raising concerns and encourages open communication at all levels. Complaints and grievances will remain strictly confidential, with access to information available only on a need-to-know basis.

3.11. HUMAN RIGHTS IN RELATION TO INFECTIOUS DISEASES

The Diacore Group of Companies fully understands that protecting the right to life and the right to health can be extremely challenging. This became apparent when the world was struck by the COVID-19 pandemic. When there is a breakout of an infectious disease that may occur without warning, Diacore is fully committed to strike a balance between keeping people healthy and safe, whilst at the same time maintaining the business operations of our group of companies. In doing so, we are committed to:

- Protecting the *right to life* and the *right to health* to reduce the risk of spreading the relevant virus.
- No employee or stakeholder shall be subject to discrimination, stigma, or unfair treatment based on actual or perceived health status.
- All health-related information shall be treated as confidential and handled in accordance with applicable data protection laws.
- Workplace measures to manage infectious diseases shall be evidence-based, non-discriminatory, and aligned with public health guidance.
- The Group will promote awareness, prevention, and support in a manner that respects human rights.

4. SUPPLY CHAIN RESPONSIBILITY

Diacore is committed to ensuring that our suppliers comply with this policy. To ensure they

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are aware of, and have been informed of our human rights expectations, they will receive a copy of this policy at the start of the business relationship. Due diligence measures are in place to ensure compliance. Non-compliance may result in corrective action or termination.

5. GRIEVANCE MECHANISM

Diacore has an effective grievance procedure in place which can be utilized by any party that has grievance with the company. Any party that submits a grievance can do so in confidence and without fear of reprisal. Diacore undertakes to resolve any complaint/query which will be investigated immediately, and we will identify corrective action that should be implemented to avoid similar complaints in the future. Diacore will ensure that the outcomes of any complaints/queries will be communicated to the relevant stakeholders. Diacore will retain all appropriate records of any grievances raised, investigations that have followed and the relevant outcomes.

6. REMEDATION

Should Diacore identify that it has caused or contributed to adverse human rights impacts it will provide for immediate remediation and take corrective action to prevent recurrence.

7. MONITORING AND REPORTING

Diacore will track and report on human rights performance where appropriate and policies and procedures will be reviewed and updated annually, or as and when required.

8. ENFORCEMENT

Diacore is committed to ensure that all human rights abuses seen or reported in connection with work will be reported to the relevant authorities and followed up. Failure to comply with the principles laid down in this policy will be viewed as a breach of company policy and procedure and could result in disciplinary action being instituted, including termination of employment or business relationships. Diacore's policies as incorporated into this document will be effectively communicated to management and to all workers.

9. APPROVAL

Approved by: Brett Josselowiz

Review date: 31 March 2026

Signature:  _____

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10. REVIEW DATES

DOCUMENT NUMBER	LAST REVIEW DATE	SIGNATURE OF REVIEW
HRP V4 31.03.2026	<i>Signed:</i> 31.03.2026 <i>Next review date by:</i> 31.03.2027	Signed above on this date