

WINDIAM 
WE BUILD STRONG RELATIONSHIPS



SUSTAINABILITY REPORT **2025**
A New Chapter of Accountability

Table of content

***1.* 2025 IN A NUTSHELL**

***2.* A WORD ON WINDIAM**

OUR STORY

WINDIAM TODAY

OUR SUSTAINABILITY JOURNEY SO FAR

***3.* ESG STRATEGY & ROADMAP**

OUR DOUBLE MATERIALITY MATRIX

OUR ROADMAP

CLUSTER 1: INSTILLING TRUST

CLUSTER 2: UPHOLDING HUMAN RIGHTS

CLUSTER 3: FOSTERING EQUAL OPPORTUNITIES

CLUSTER 4: CONTRIBUTION TO LIFE

CLUSTER 5: ECONOMIC RELEVANCE



1.
2025
IN A NUTSHELL

WINDIAM MFG: A NEW CHAPTER OF ACCOUNTABILITY

When we published our first Sustainability Report, we described it as the beginning of an exciting ESG journey. At that stage, our priority was clarity: defining what mattered most, formalizing our commitments, and putting governance in place. This second report feels very different. It is no longer about intent or direction. It is about demonstrating how those convictions translate into real, operational choices.

The most visible expression of that shift is **Windiam MFG**, our new manufacturing facility in Surat. We are very proud of what has been achieved. Windiam MFG did not come to life by chance. It is the result of focused work and shared belief, and we sincerely thank the teams who brought this project to life with patience, commitment, and an unwavering attention to quality and responsibility.

The decision to build Windiam MFG was neither obvious nor easy. Historically, we have built Windiam through partnerships, trust, and deep expertise, not by expanding ownership as a goal. For many years, this approach served us and our customers extremely well. Yet the context around us has evolved. Expectations placed on our industry by customers, regulators, and society increasingly extend beyond sourcing alone. They now require accountability for how diamonds are manufactured, by whom, and under which conditions.

For us, Windiam MFG represents a natural evolution of Windiam's story. Ours is a company built across generations on mastery, precision, and enduring relationships. Establishing a presence in Surat, at the heart of the global diamond manufacturing ecosystem, allows us to remain faithful to that heritage while consciously preparing Windiam for the future.

This step was driven by a simple conviction. If we want to stand behind the quality, integrity, and traceability of the diamonds we supply, we must be willing to engage directly with the realities of manufacturing. Windiam MFG gives us that proximity. It brings us closer to the process, closer to people, and closer to the responsibilities that come with deeper involvement.

Our customers expect more than exceptional diamonds. They expect reliability, consistency, transparency, and increasingly, evidence. Windiam MFG strengthens our ability to deliver to all these expectations. By bringing manufacturing closer to our teams and systems, we gain greater control over quality, calibration, and lead times. At the same time, we are better equipped to meet growing customer requirements around provenance, compliance, and documentation. In a market where trust must be demonstrated rather than assumed, this matters.

Windiam MFG also marks a meaningful shift in how ESG lives within our organization. Until recently, much of our impact was indirect, expressed through sourcing standards, audits, and supplier engagement. With Windiam MFG, ESG becomes concrete and operational.

This report opens the door to our ESG progress and to a new chapter in Windiam's story.

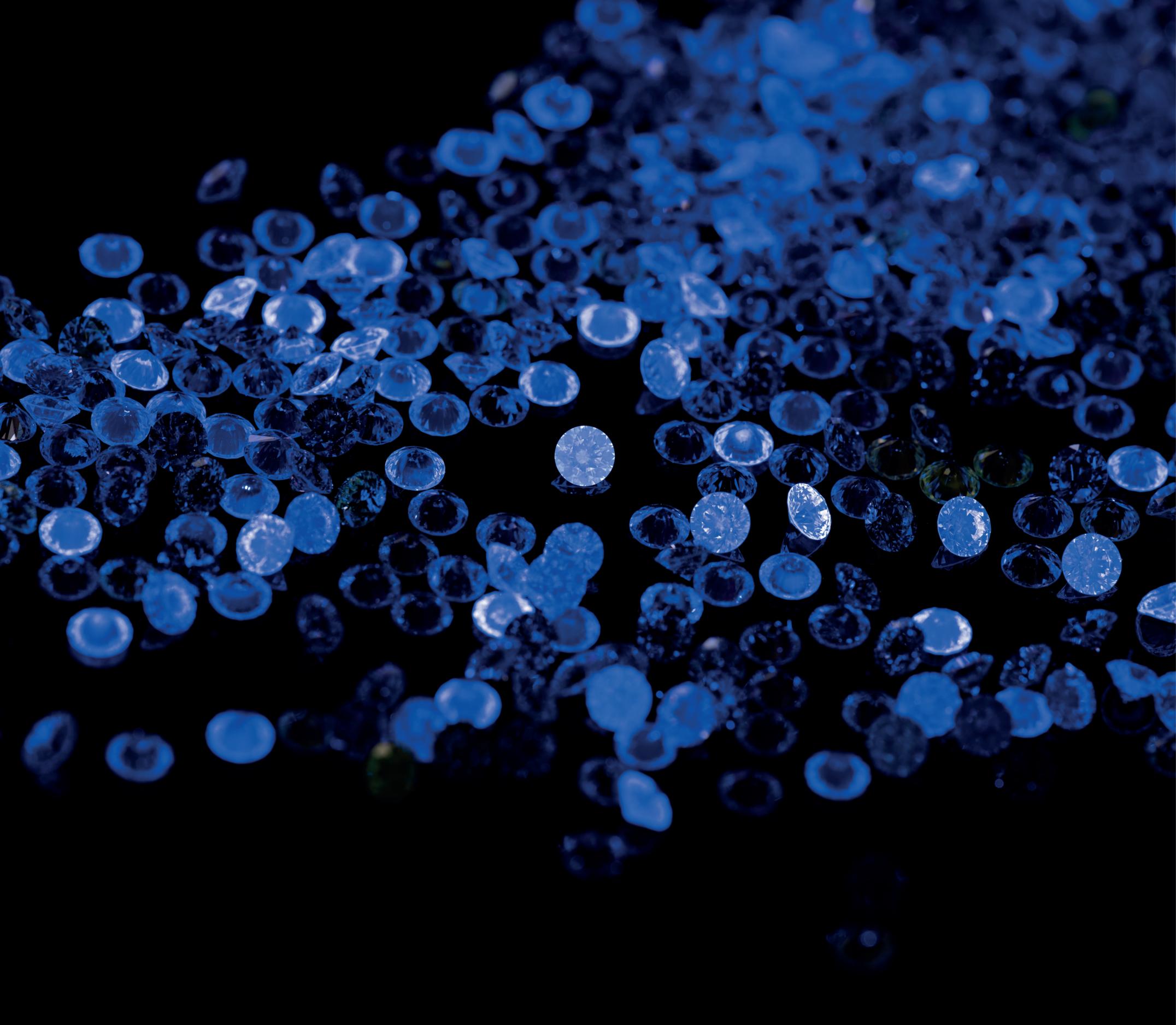
Dimitri Rozenbaum
Managing Partner





“Creating Windiam MFG — our new manufacturing facility — was a conscious decision to move closer to reality: closer to people, processes, and accountability”

GON RAZ & ALEX JAFFE, DIRECTORS



2.

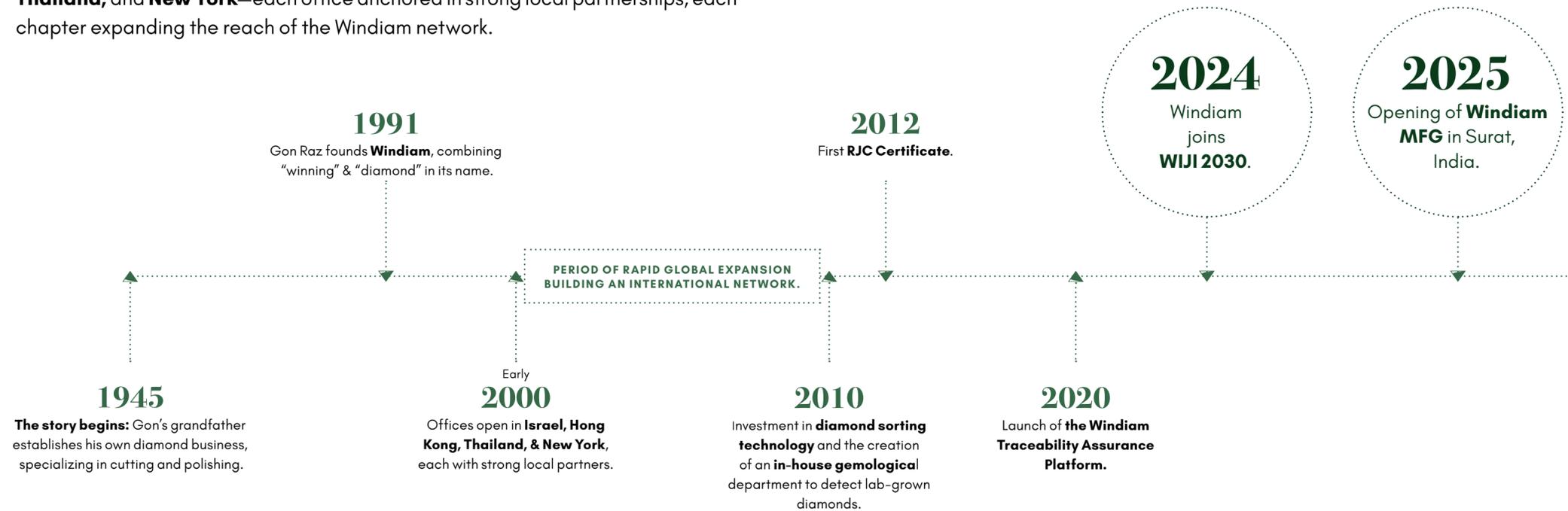
A WORD
ON WINDIAM

Our Story

CRAFTED THROUGH GENERATIONS, SHAPED BY PEOPLE

- Windiam’s story begins far from global trade hubs—among the orange trees of 1930s Netanya, where a young man traded farm work for a craft that was just emerging in Tel Aviv: diamond cutting. He joined the first workshops opened by diamantaires from Antwerp, and in 1945, he founded the family’s diamond business. One generation later, his son honed a unique expertise in non-round diamonds, giving the family a distinctive signature in a fast-moving industry.
- When it was Gon’s turn, he left for Antwerp, learned the business from the ground up, and followed an entrepreneurial instinct that led him to create Windiam in 1991—its name blending “winning” and “diamond,” an echo of the optimism and ambition of that moment.
- Windiam grew quickly, shaped by encounters, friendships, and bold decisions. In 1997, long-time friend and rough-diamond expert Alex Jaffe joined Gon, opening new horizons and new markets. Together, they brought an open, outward-looking energy to a traditionally discreet industry, building an international presence through world-renowned watch and jewelry fairs.
- By the early 2000s, Windiam was operating in **Israel, Antwerp, Hong Kong, Thailand,** and **New York**—each office anchored in strong local partnerships, each chapter expanding the reach of the Windiam network.

- During the 2008 crisis—a moment that reshaped the entire diamond world. Windiam chose reinvention. The company shifted toward serving manufacturers, retailers, and global brands, invested in technology and talent, and strengthened its role as a trusted European supplier. It also anticipated the rise of lab-grown diamonds earlier than most, developing in-house detection capabilities and a gemological department to guarantee integrity.
- Windiam’s commitment to transparency later led to the creation of the **Windiam Traceability Assurance Platform**, one of the industry’s most rigorous frameworks for verified provenance and supplier accountability.
- In 2025, the opening of **Windiam MFG** in Surat, India, marked a new turning point. By establishing a strategic manufacturing extension at the heart of the diamond ecosystem, Windiam chose proximity over distance—bringing responsibility, traceability, and craftsmanship closer to its core operations. Windiam remains a company driven by people, relationships, and the belief that excellence is built step by step.



Windiam today

BUILDING TRUST, ONE DIAMOND AT A TIME.

OUR VISION

To be a trusted reference in the global diamond industry, known for integrity, consistency, and deep-rooted expertise.

OUR MISSION

To responsibly source, manufacture and trade diamonds by investing in people, mastering our craft, and fostering long-term partnerships across the value chain.

Our Core Values

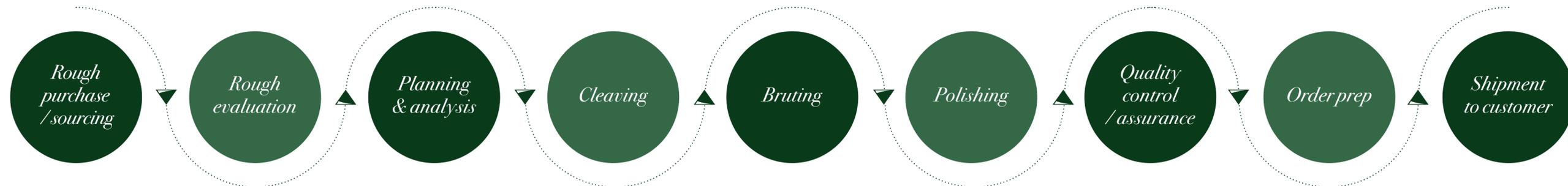
1 People First - Rooted in Antwerp's long-standing cosmopolitan spirit, Windiam is committed to nurturing talent beyond social or cultural boundaries. Diversity is not a principle—it is our daily reality, shaped by the people who make up our company. Inclusion is a cornerstone of our culture. Every background, perspective, and life path is welcomed as a strength. This openness fuels mutual learning, intergenerational exchange, and a work environment where everyone grows together.

2 Trust, Loyalty & Excellence - In a world driven by speed, Windiam chooses consistency and respect for the craft. Our company has been built on long-standing, trusted relationships with employees, clients, and partners. Our low staff turnover reflects genuine commitment and shared values. Like a diamond shaped over time, excellence at Windiam is rooted in experience, patience, and care. This human stability allows us to deliver exceptional service and a precise understanding of our clients' needs.

3 Positive Impact - Windiam maintains deep ties with the regions where our stones originate. Aware of our responsibility toward producing countries, we work closely with local African partners, and now in India for the craft, fostering relationships built on transparency, traceability, and mutual respect. We aim to generate positive social impact at every step of the value chain—supporting local economic development, strengthening skills, and promoting responsible practices.

Our Product

- Windiam offers a wide range of diamonds and is recognized for its perfectly calibrated stones, particularly in small and specialty sizes for watch and jewellery makers. With the launch of its own manufacturing facility in India, Windiam has evolved from a sourcing-led model to a more integrated approach, combining an exclusive manufacturing partnership with long-standing expertise in selection and finishing.
- This closer control over the cutting and manufacturing process enhances precision, consistency, and responsiveness. Exceptional service remains central to Windiam's approach, bringing together responsible sourcing, in-house manufacturing, meticulous calibration, and expert sorting. For baguettes and fancy cuts, nano-precision techniques ensure flawless setting and performance.
- As lab-grown diamonds gain momentum, Windiam reinforces product integrity through strict verification protocols and advanced detection technologies. By uniting production, quality control, and traceability within a single, coherent framework, Windiam strengthens its ESG performance and builds long-term trust with its clients.





Windiam’s governance model is designed to ensure that ESG commitments are translated into operational decisions.

Our Company Structure

- Windiam operates under a clear and transparent ownership and governance structure. The company has two Ultimate Beneficial Owners (UBOs), **Gon Raz** and **Alexandre Jaffe**, both actively involved in the management of the business.
- This streamlined governance model supports agility, transparency, and effective engagement with external stakeholders, including financial institutions, auditors, and regulatory authorities.

Our Company Structure

- The Windiam Group employs **35 people** across Antwerp, Paris, and Italy, positioning it among the most structured and specialized diamond trading companies in its segment. Operations are organized around two core divisions—**polished diamonds** and **rough diamonds**—supported by **a central administrative** team and a **tailor-made ERP system** integrating sourcing, compliance, traceability, and commercial operations. The CSR execution and coordination is operating under this central administrative department.
- Since Q4 2025, Windiam has expanded its operating model through Windiam MFG, an **exclusive manufacturing partnership** in India dedicated to high-grade cutting and polishing of minus 2, stars, and melees. This partnership represents a strategic extension of Windiam’s value chain, reinforcing quality control, traceability, and operational consistency while remaining fully aligned with the company’s governance and compliance framework.

Compliance Leadership at the Core of Our Governance

Following the appointment of an international Compliance Manager in the previous year, 2025 marks a phase of consolidation and acceleration.

Strengthening Compliance Leadership

In 2025, the Compliance Manager played an expanded leadership role within Windiam, acting as a central coordinator across business units, regions, and operational teams. Key areas of leadership and execution included:

- Driving the implementation of ESG strategy at operational level, ensuring alignment between corporate commitments and on-the-ground practices, including within Windiam's manufacturing environment
- Supporting senior management decision-making and leading cross-functional governance initiatives, bringing together sales, sourcing, manufacturing, HR, finance, and IT around shared compliance objectives

Execution of Major Governance & ESG Projects

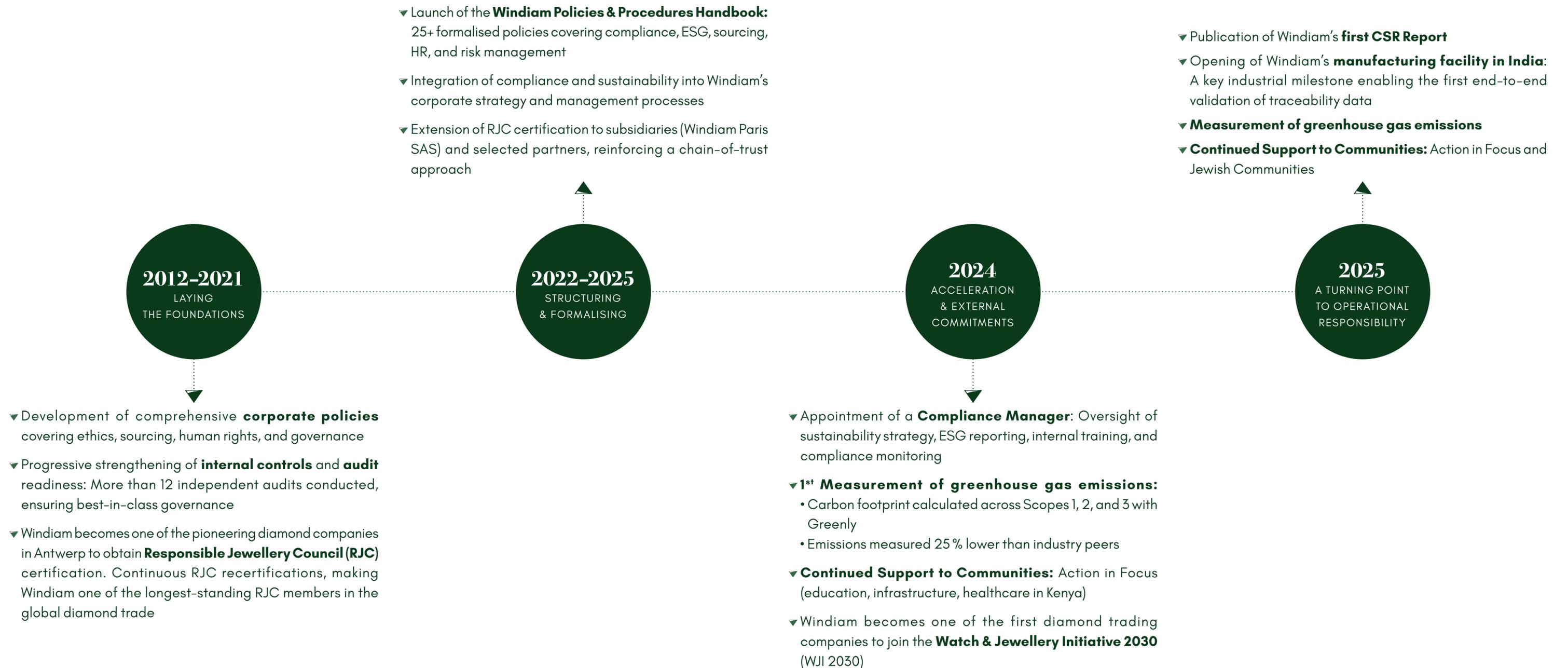
Throughout 2025, the Compliance Manager led or supervised several key initiatives, including:

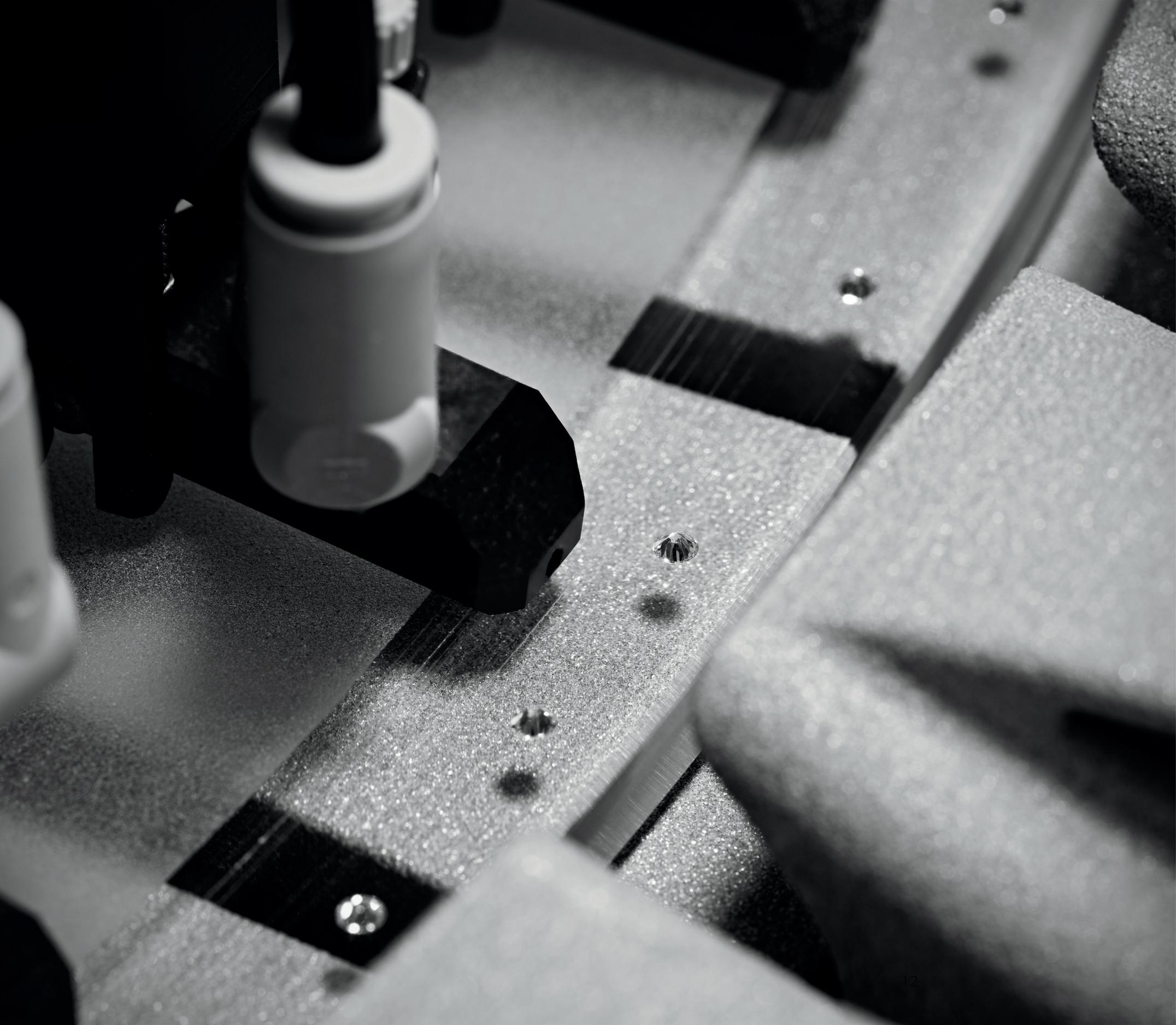
- Operational deployment of the Policies & Procedures Handbook, moving from documentation to active application through training sessions, internal audits, and corrective action plans
- Extension of compliance frameworks to manufacturing operations, ensuring that labour rights, health and safety, environmental management, and due diligence standards are fully embedded
- Coordination of traceability and data integrity processes, supporting the validation of ESG and provenance data across sourcing, manufacturing, and distribution
- Preparation for upcoming regulatory requirements, including CSRD-readiness and SBTi-aligned climate governance

Embedding a Culture of Responsibility

Beyond systems and procedures, Windiam considers culture a critical pillar of effective governance. Infusing a shared culture of dialogue and accountability across the organization is essential to ensuring that policies are not only applied, but truly lived. In 2025, particular attention was given to fostering a common understanding of ESG expectations across teams and geographies. This included regular dialogue, hands-on training, and direct engagement with operational teams, including within the new manufacturing environment.

Our Sustainability Journey so far





3. ESG STRATEGY & ROADMAP

Our Double Materiality Matrix

WE DESIGNED 5 CLUSTERS. EACH CLUSTER IS ACTIONABLE, MEASURABLE THROUGH KPIS, AND ALIGNED WITH THE UN SDGS.

1 INSTILLING TRUST

- RESPONSIBLE SOURCING
 - TRANSPARENCY & TRACEABILITY
 - PRODUCT PROVENANCE
 - COOPERATION IN SUPPLY CHAIN
- (Linked to SDGs: 12 - Responsible Consumption & Production, 9 - Industry, Innovation & Infrastructure, 17 - Partnerships for the Goals)*

- CLIMATE CHANGE
 - CO2 NEUTRAL
 - PACKAGING & WASTE
 - RENEWABLE ENERGY
- (Linked to SDGs: 13 - Climate Action, 14 - Life Below Water, 15 - Life on Land)*

- HUMAN RIGHTS
 - ARTISAN MINING
 - COMMUNITY ENGAGEMENT
- (Linked to SDG: 10 - Reduced Inequalities)*

- DIVERSITY AND INCLUSION
 - TALENT ATTRACTION & RETENTION
 - WOMEN AND G&I (GENDER & INCLUSION)
- (Linked to SDGs: 5 - Gender Equality, 8 - Decent Work & Economic Growth)*

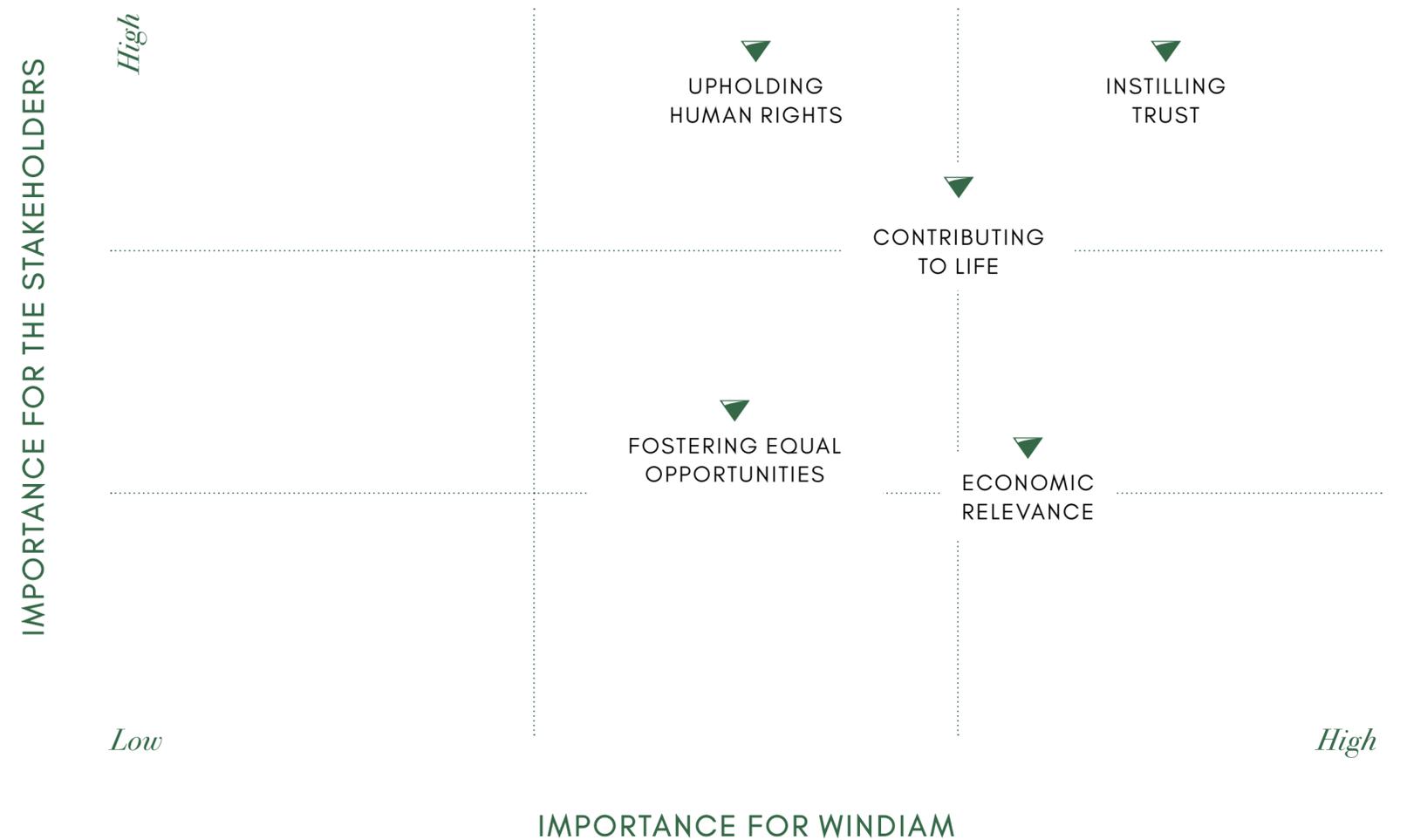
- SUSTAINABLE BUSINESS MODEL
 - FINANCIAL PERFORMANCE
- (Linked to SDG: 16 - Peace, Justice & Strong Institutions)*

2 UPHOLDING HUMAN RIGHTS

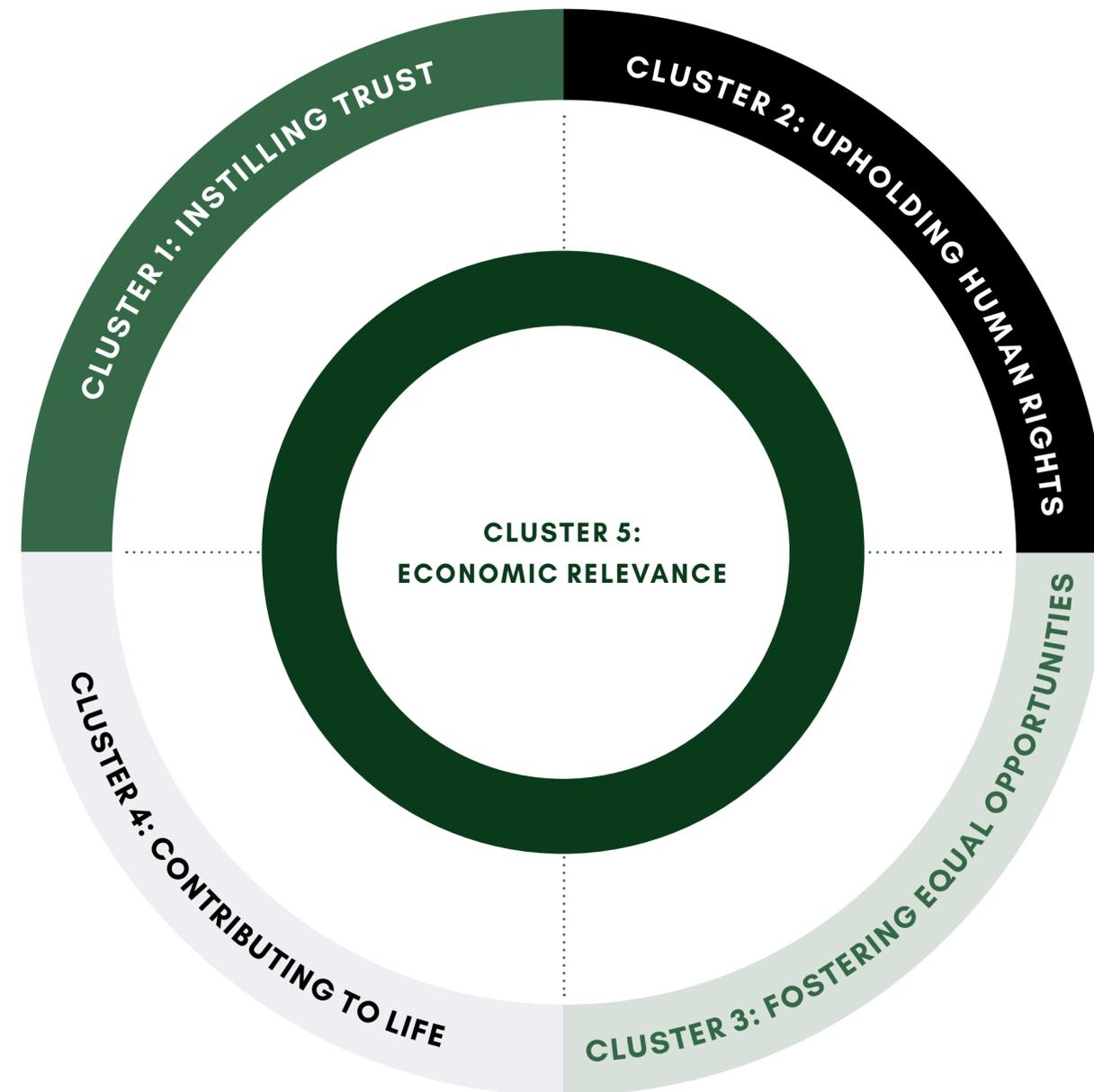
3 FOSTERING EQUAL OPPORTUNITIES

4 CONTRIBUTING TO LIFE

5 ECONOMIC RELEVANCE



Our Roadmap





CLUSTER *1.*

INSTILLING TRUST

OUR COMMITMENT:

Windiam is dedicated to fostering trust and confidence in the integrity of its supply chain. As a mid-segment, independent diamond trader (Tier 2) without direct access to mines, Windiam has historically relied on strong, long-term supplier relationships and significant buying power in the secondary market.

In 2025, this commitment enters a new phase. With the creation of its own manufacturing workshop in India - Windiam MFG - Windiam strengthens its ability to move from indirect influence to direct responsibility. Windiam MFG is a cornerstone of the company's broader Instilling Trust strategy, positioning Windiam as a reliable, agile, and transparent partner in an increasingly demanding luxury supply chain.

Cluster 1: Instilling trust

MAIN TOPIC 1: RESPONSIBLE SOURCING

Windiam dedicates all available resources to ensuring a 100% responsible supply chain, protecting human rights, safeguarding reputations, and strengthening relationships with clients, partners, and stakeholders.

The company follows the OECD Due Diligence Guidance for Responsible Sourcing, applying its five-step framework to identify, assess, and mitigate risks related to human rights, ethical conduct, and compliance throughout the supply chain.

In 2025, the integration of manufacturing allows Windiam to apply these principles not only upstream but also within its own operational perimeter, reinforcing consistency between commitments and practices.

Windiam MFG strengthens Windiam's ability to:

- **Demonstrate end-to-end traceability**
- **Respond rapidly to regulatory and client requirements**
- **Support social and compliance performance through controlled manufacturing**

WINDIAM MFG: A NEW ANCHOR FOR TRUST

In 2025, Windiam consolidated the launch of Windiam MFG, its exclusive manufacturing partnership based in Surat, India—at the heart of the global diamond cutting and polishing ecosystem. Extensive refurbishment works carried out between June and August enabled the creation of a production site designed for controlled material flows, segregation protocols, and systematic documentation.

Full vertical integration as a traceability enabler

Windiam MFG marks a strategic shift from outsourced manufacturing to direct operational control. By integrating cutting and polishing in-house, Windiam reduces fragmentation in both physical flows and data collection—one of the main limitations of traditional subcontracting models. This vertical integration enables continuous oversight from rough diamond intake to polished output, strengthening traceability, quality control, and risk management.

Integrated traceability architecture

To support this transformation, Windiam is deploying a dedicated ERP system and a traceability platform aligned with luxury brand expectations and evolving European regulatory frameworks, including CSRD. The traceability framework is built on a structured data model capturing origin, manufacturing steps, batch movements, and compliance documentation, fully aligned with mapped physical flows within the factory. Controlled access rights and audit-ready data storage ensure consistency between physical goods and digital records. The data model is scheduled for finalization by December, with ongoing coordination between IT and production teams to secure data integrity.

Traceability by design

Designed from the ground up, Windiam MFG embeds governance and responsibility directly into manufacturing operations. Each production stage follows documented workflows, strict non-mixing rules, and auditable controls. Naturality is safeguarded through dedicated gemological checkpoints, advanced detection equipment, and external laboratory verification. The system enables secure documentation of origin, manufacturing, and ESG-related data, while remaining compatible with brand-side traceability platforms and future Digital Product Passport requirements. By industrializing traceability at manufacturing level, Windiam reinforces its position as a long-term, accountable partner, strengthening transparency and trust across the value chain.

Cluster 1



Natural diamond verification embedded in the process

Natural diamond verification is fully embedded into the Windiam MFG production workflow. While naturality is now considered a market standard rather than a differentiator, Windiam treats it as a non-negotiable foundation of trust.

The factory integrates multiple control points where diamonds are systematically tested using detection machines capable of sorting stones into:

- Natural
- To be confirmed
- Synthetic

Each test generates documented results that are retained as part of the diamond's traceability record. Historically, these controls were conducted manually and documented in standalone Excel files. Under Windiam MFG, naturality data is progressively integrated into the traceability platform, ensuring a consolidated, auditable record accessible to compliance teams and clients.

From compliance requirement to operational standard

By embedding naturality verification within a broader traceability system, Windiam moves beyond isolated compliance checks toward an industrialized, repeatable process. This approach enhances transparency, reduces operational risk, and responds directly to brands' expectations for verifiable and documented assurances rather than declarative statements.

BEHIND THE SCENES - BUILDING WINDIAM MFG

"For decades, Windiam was built on trust, partnerships, and expertise. Creating our own workshop was not about control for its own sake. It was about responsibility. If we want to stand behind the integrity of our diamonds, we must also stand behind the conditions in which they are crafted."

— Gon Raz, Director, Windiam

The creation of Windiam MFG was the result of several years of reflection and preparation. The project required navigating cultural, operational, and regulatory complexities, while remaining faithful to Windiam's long-standing values. From selecting the location to assembling local teams and aligning processes with ESG requirements, the workshop was designed as a strategic and ethical investment, not a short-term operational decision.

Cluster 1

KPI 1:

MAXIMIZING OUR RJC CERTIFIED SUPPLIER BASIS

- The Responsible Jewellery Council (RJC) is the leading sustainability standard in the diamond and jewellery supply chain. Its Code of Practice 7 (COP 7) establishes a credible and auditable framework for due diligence in responsible sourcing, ensuring compliance through independent third-party audits. RJC certification serves as a key benchmark for supplier quality.
- Since 2021, Windiam has actively promoted RJC membership among its key suppliers of rough and polished diamonds. In 2025, the number of RJC's supplier increases: this confirms Windiam's strategy of prioritising responsible partners for the majority of its business volume, while continuing to engage and support progress across its broader supplier base.

BASELINE FIGURES (2024): Share of RJC certified suppliers



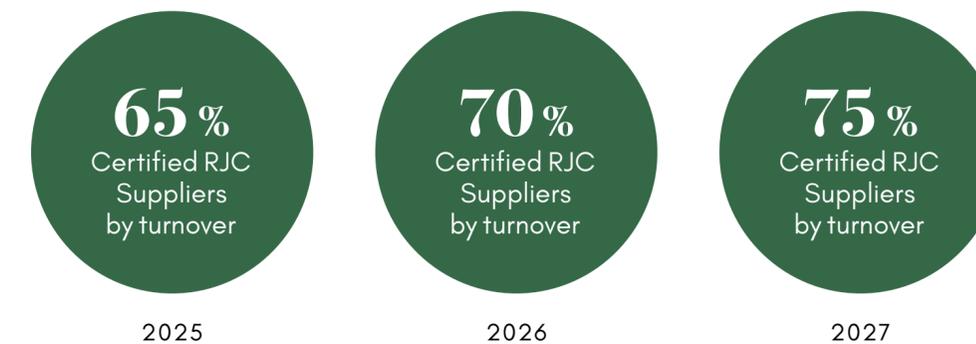
BASELINE FIGURES (2025): Share of RJC certified suppliers



REALISTIC OBJECTIVES FOR SUPPLIER CERTIFICATION

- Windiam has successfully convinced its most critical suppliers (following the 20/80 rule) to become RJC Certified Members, largely due to the certification's importance in their customer mix.
- While achieving 100% RJC certification among suppliers is unrealistic due to business constraints, Windiam remains committed to balancing sustainability with commercial objectives. Its measurable approach allows for adjustments over time if supplier engagement improves.

TARGET FIGURES (2025-2027): Share of RJC certified supplier



ACHIEVED IN 2025

KPI 2: ENHANCED SUPPLY CHAIN DUE DILIGENCE (SCDD)

Windiam initiated its Supply Chain Due Diligence (SCDD) in 2021 as part of its RJC Certification, following the OECD 5-step Framework for responsible sourcing from conflict-affected and high-risk areas (CAHRAs). Windiam acknowledges identified challenges (lack of awareness, limited certification and reluctance to share origin data) and seeks to enhance supplier awareness and data transparency while maintaining a realistic approach to industry limitations.

KPI 2A: COMPLETE RETURNS ON SUPPLY CHAIN DUE DILIGENCE (SCDD) REPORTS

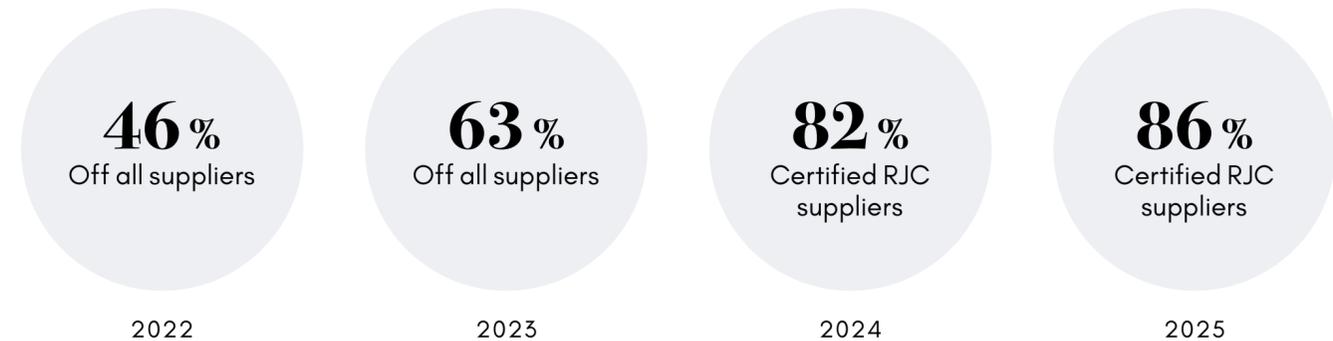
•Windiam aims for full compliance in SCDD reporting, ensuring **100% of suppliers submit reports**, including all new contracted suppliers. Significant progress has been made over the past three years. While the completion rate did not fully reach the initial target, the result reflects a strong level of engagement across Windiam’s supplier base. Incomplete files were primarily linked to administrative issues (e.g. expired identification documents) rather than missing or unreliable core information.

•In terms of business relevance, the coverage achieved represents 94 % of total supplier turnover, confirming that Windiam’s most strategic partners are fully aligned with its due diligence requirements. The company remains confident in further improving completion rates in 2026 through continued follow-up and support.

TARGET FIGURES (2025-2027): Returned SCDD Reports



BASELINE FIGURES (2022-2024): Returned SCDD Reports



Cluster 1

KPI 2B: ASSESS THE QUALITY OF THE SUPPLY CHAIN DUE DILIGENCE REPORTS

Windiam has focused on collecting SCDD reports and identifying potential red flags, though none have been raised so far. In 2025, the company has assessed the quality of supplier responses to ensure accuracy and reliability. The roadmap aims to categorise all suppliers into 3 different categories.



1. Low Risk Suppliers

Suppliers with RJC or similar certifications will be categorized as low risk. Their only ongoing task will be to maintain their certification status.

2. Medium Risk Suppliers

These suppliers haven't undergone an independent third-party audit. Windiam will first prioritize suppliers from countries with a Corruption Perceptions Index (CPI) below 40. The assessment will include:

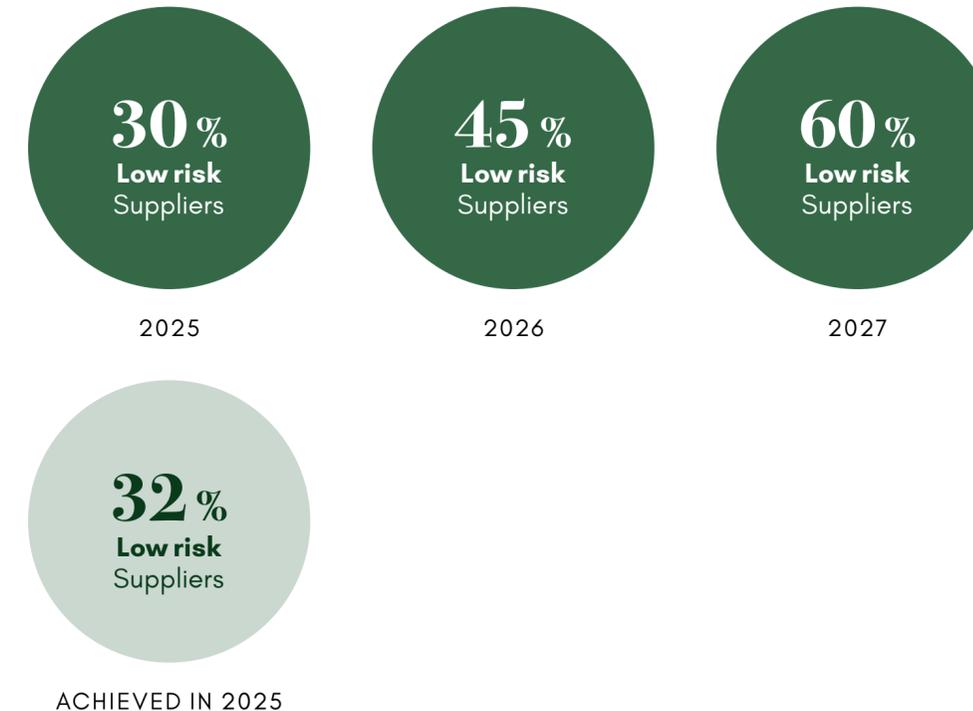
- Invoice analysis to compare declared origins with SCDD report information.
 - Direct interviews to discuss issues and help suppliers align with Windiam's policies.
- Suppliers who do not cooperate or meet standards will be moved to High Risk, while satisfactory suppliers will be moved to Low Risk.

3. High Risk Suppliers

These fall into three categories:

1. Non-respondents (18 % of suppliers).
2. Non-cooperative Medium Risk suppliers.
3. Medium Risk suppliers who fail to meet expectations after an assessment. High-risk suppliers will be reviewed at the annual sustainability meeting where management will take the necessary actions.

TARGET FIGURES (2025-2027): Supplier risk rating

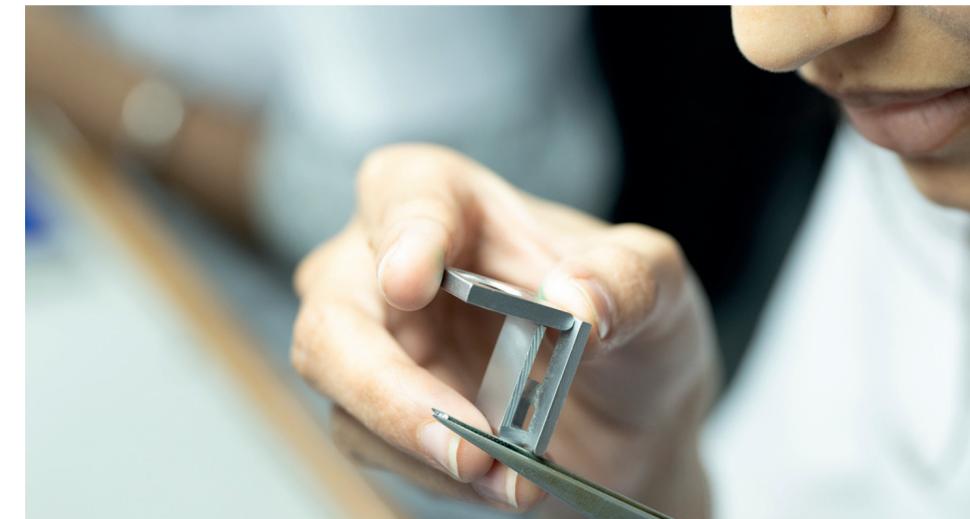


This result demonstrates a gradual improvement in the overall risk profile of Windiam's supply chain. It reflects both the strengthening of supplier practices and the effectiveness of Windiam's due diligence framework in identifying, assessing, and mitigating risks.

KPI 3: SUPPLIERS AGREEING TO WINDIAM'S SUPPLIER CODE OF CONDUCT

- Following extensive discussions with its partners, Windiam formally launched its **Supplier Code of Conduct (CoC)** in 2025. The CoC defines the ethical, social, and environmental standards expected from all suppliers and covers integrity and legal compliance, respect for human rights and fair labour practices, safe and healthy working conditions, environmental responsibility, and zero tolerance for corruption. It further requires transparency across the supply chain, the existence of effective grievance mechanisms, acceptance of monitoring and audits, and a commitment to continuous improvement in line with responsible sourcing principles.
- Initial feedback has been very positive. Windiam's strategic partners have responded favourably and demonstrated early alignment with the Code. Engagement with the broader supplier base is ongoing, with Windiam providing guidance and support to facilitate progressive alignment. This approach reflects Windiam's belief that trust and compliance are best built through collaboration and continuous improvement rather than exclusion.
- By the end of 2025, **7.5%** of Windiam's supplier base had formally signed the Supplier Code of Conduct. While this represents a limited share in absolute numbers, these suppliers account for a significant majority of Windiam's purchasing volumes, representing **85.29% of rough diamond purchases** and a substantial share of polished diamond sourcing. This demonstrates that Windiam's initial focus has been placed on its most strategic and impactful supplier relationships, ensuring that the Code is embedded first where it matters most in terms of supply-chain influence.

TARGET FIGURES (2025-2027): Signed Supplier Code of Conduct



MAIN TOPIC 2: TRANSPARENCY & TRACEABILITY

- Traceability continues to be a strategic priority for Windiam in a diamond industry increasingly shaped by geopolitical uncertainty and reinforced regulatory expectations. In response, the company has further strengthened its approach to origin transparency and responsible sourcing.
- Windiam maintains a long-term partnership with **Trau Bros NV**, providing access to diamonds originating from De Beers’ mining operations, and reinforcing a supply base built on verified provenance and responsible practices.
- To support this ambition, Windiam relies on its **Windiam Traceability Assurance Platform (WTAP)**, a robust framework requiring suppliers to formally guarantee origin information and submit to regular independent audits. These audits are conducted on a recurring basis—either unannounced throughout the year or at least annually—and form a core mechanism for monitoring compliance. Suppliers failing to meet the platform’s requirements may be excluded. Windiam itself is also subject to annual audits and publicly reports on traceability performance, reinforcing transparency across the value chain.
- Windiam continues to exclude countries associated with human rights concerns from its approved sourcing list and remains committed to progressing toward full transparency through continuous improvement, operational vigilance, and strengthened data reliability.

KPI 1: ENHANCED DUE DILIGENCE ON DIAMOND ORIGIN

- To respond to increasingly stringent requirements on diamond provenance and origin claims, Windiam introduced an enhanced due diligence process on diamond origin in January 2023. This mechanism requires suppliers to provide a formal origin declaration for each order, confirming both the country of origin and the country of manufacturing. These declarations constitute auditable documentation and are systematically integrated into invoice processing and internal controls.

- Following a pilot and evaluation phase, the system was progressively deployed across the organisation and fully embedded into operational processes in 2024. In 2025, the enhanced due diligence framework reached a high level of maturity, enabling Windiam to achieve 99.99% traceability of diamond origin, against a target of 100%. The marginal gap is linked to exceptional transactions involving very limited volumes of legacy or “old” stock acquired from long-standing clients, for which historical origin data is no longer available. These cases are closely monitored and remain strictly controlled.
- Windiam continues to strengthen this system through continuous process improvements, supplier engagement, and data reliability checks, with the objective of sustaining near-total traceability and maintaining alignment with evolving regulatory and industry expectations.

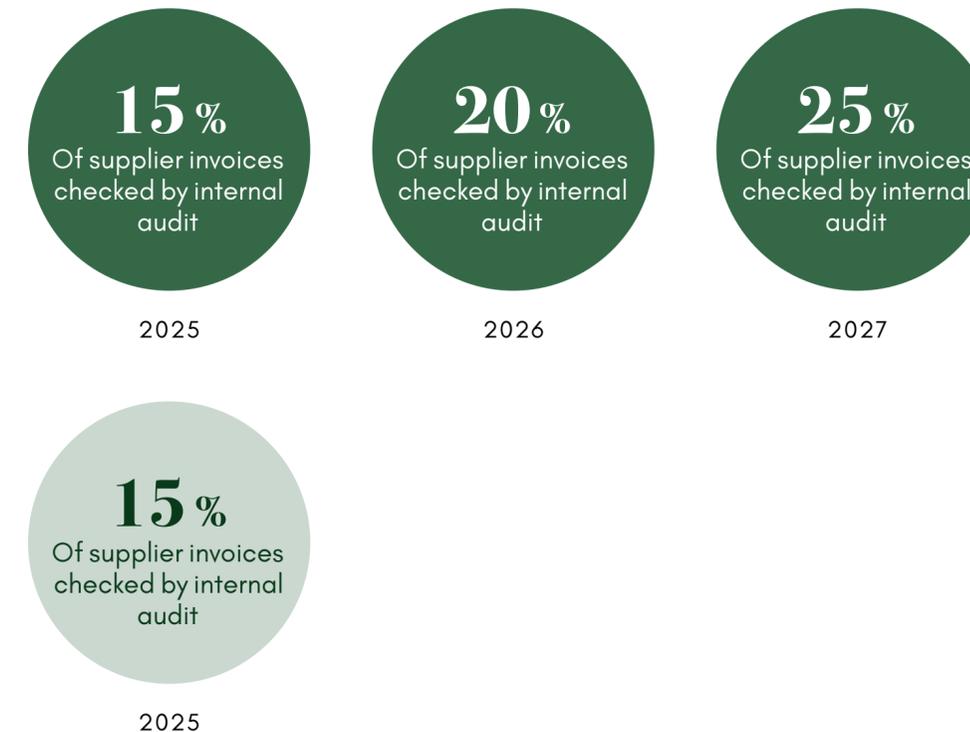
TARGET FIGURES (2025-2027)



KPI 2: INTERNAL AUDIT SYSTEM

- To ensure continuous and robust monitoring of traceability performance, Windiam has established an internal audit system dedicated to compliance and origin verification.
- An **internal Compliance Auditor** is responsible for conducting biannual audits, based on random sampling of supplier invoices, with systematic cross-checks against ERP data and enhanced due diligence documentation. This control mechanism ensures that origin declarations, supplier information, and transactional data remain consistent, complete, and auditable. The long-term objective is to maintain 100 % traceability at invoice level, supported by documented and verifiable evidence.
- In 2025, Windiam met its audit target by reviewing 15 % of polished diamond supplier invoices. All audited invoices included 100 % origin information, confirming the effectiveness and reliability of the enhanced due diligence and internal control systems.
- Key findings and recommendations are consolidated into internal audit reports and reviewed with senior management during dedicated sustainability and compliance meetings. Based on these reviews, corrective actions or process improvements are defined where necessary. Windiam will continue to progressively expand the scope of internal audits in order to further strengthen traceability controls and refine KPIs over time.

TARGET FIGURES (2025-2027)



MAIN TOPIC 3: COOPERATION IN THE SUPPLY CHAIN & COMPLIANCE

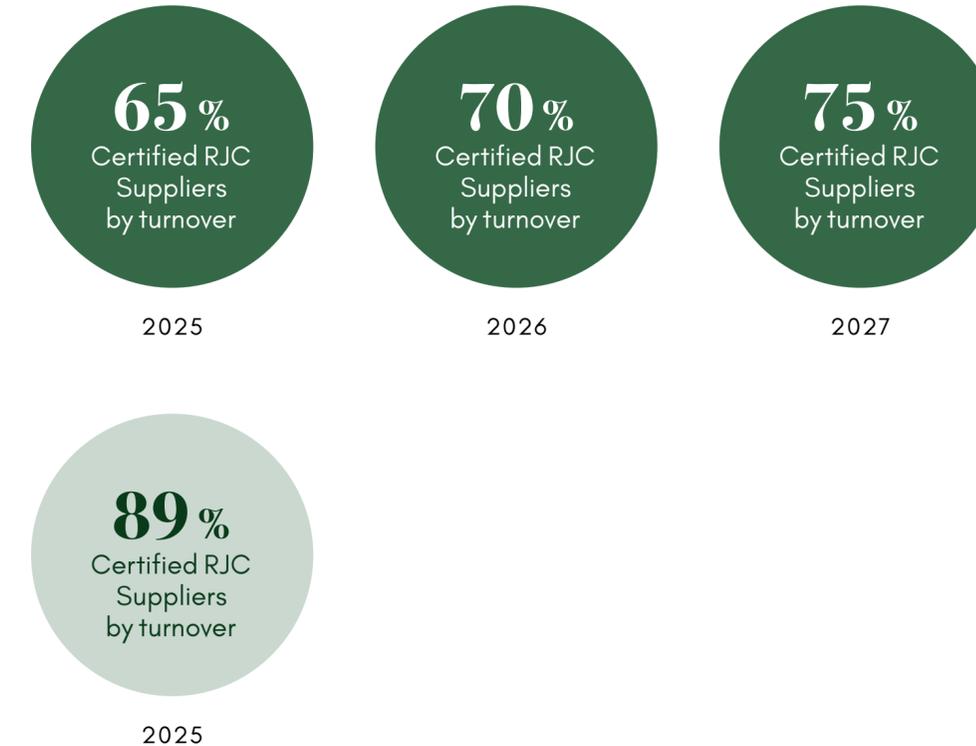
- Windiam has been a certified member of the Responsible Jewellery Council (RJC) since 2012, making it one of the earliest adopters of the RJC Code of Practices in the diamond trade. Subject to independent third-party audits every three years, Windiam has undergone its fourth recertification in 2025. RJC certification provides a robust governance framework, strengthens credibility, and supports continuous improvement across responsible sourcing, human rights, and business ethics.



- Windiam joined the Watch & Jewellery Initiative 2030 in 2024, aligning with a global coalition of industry leaders committed to accelerating sustainability transformation. Through this initiative, Windiam engages on three priority areas: climate resilience, resource preservation, and inclusiveness. Progress and analyses related to climate and resource management are detailed in Pillar 1 and Pillar 2 of this report.

WATCH & JEWELLERY
INITIATIVE 2030

As a reminder of KPI1: TARGET FIGURES (2025-2027): Share of RJC certified supplier





CLUSTER 2.

UPHOLDING HUMAN RIGHTS

OUR COMMITMENT:

Respect for human rights is a fundamental responsibility for all businesses, regardless of size, sector, or geography. In the diamond industry—where supply chains span multiple countries and socio-economic contexts—this responsibility is particularly critical. At Windiam, human rights are embedded into both internal operations and supply chain governance. Evolving European regulations increasingly extend corporate responsibility beyond direct operations, requiring heightened vigilance across the entire value chain. In 2025, the company reinforces its commitment by strengthening awareness, due diligence, and accountability related to human rights throughout its business and partner ecosystem.

“At Windiam, community support is about safeguarding spaces where diversity, dialogue, and freedom can endure. In times of division, we choose engagement grounded in respect and solidarity.”

GON RAZ, DIRECTOR

Cluster 2: Upholding human rights

Social, cultural & economic rights

The right to participate in cultural activities, the right to food, the right to clean drinking water & sanitation & the right to education;

Labour rights

The right to freedom of association & effective recognition of the right to collective bargaining, & freedom from forced labor, child labour & discrimination;

Civil & political rights

The right to life & liberty, freedom of expression, and equality before the law. While some of these human rights might sound abstract from a business perspective, they are often the underlying rationale for a company's policies & procedures.

Windiam upholds fundamental human rights through a comprehensive set of policies, including:

- **Human Rights & Due Diligence Policy**
- **Child Labour & Forced Labour Policies**
- **Freedom of Association & Collective Bargaining Policy**
- **Non-Discrimination Policy**
- **Kimberley Process (KP) Policy**

These policies apply across Windiam's internal operations, including manufacturing activities, and are reinforced through supplier engagement and contractual expectations. Compliance is verified through independent third-party audits, notably under the Responsible Jewellery Council (RJC) framework.

Windiam also reports transparently on its human rights commitments and performance, reinforcing accountability and stakeholder trust.

MAIN TOPIC 1: RESPONSIBLE SUPPLY CHAINS

Our Commitment:

Windiam is committed to expanding its efforts to raise awareness of human rights across its supply chain. As a mid-stream actor, the company recognises that its primary leverage lies in collaboration, supplier engagement, and the consistent application of clear standards.

Through its policies, Supplier Code of Conduct, audits, and ongoing dialogue, Windiam seeks not only to ensure compliance, but also to encourage progressive alignment among its partners. By doing so, the company aims to contribute to the broader advancement of human rights practices within the diamond industry.

Policies & Procedures Framework

Since 2012, Windiam has progressively developed a comprehensive framework of corporate policies aligned with the Responsible Jewellery Council (RJC) Code of Practices. As the business and regulatory landscape evolved, this framework expanded and was consolidated in 2022 into the **Windiam Policies & Procedures Handbook**. The Handbook currently includes 25 policies and associated procedures.



KPI 1: RESPONSIBLE PROCUREMENT

Responsible procurement remains a core ESG priority for Windiam, particularly in mitigating risks related to conflict-affected and high-risk areas (CAHRAs). The company recognises that unethical sourcing practices can contribute to severe human rights violations, including conflict financing, forced labour, and other forms of abuse.

Windiam enforces a strict responsible sourcing framework applicable to both rough and polished diamonds. Suppliers are required to comply with internationally recognised standards, including:



- **the Kimberley Process Certification Scheme (KP),**
 - **the World Diamond Council System of Warranties (SoW),**
 - **the OECD Due Diligence Guidance for Responsible Supply Chains.**
- As part of its enhanced due diligence approach, Windiam requires all suppliers to provide valid KP certificates (for rough diamonds), accurate SoW statements, comprehensive KYC documentation, and completed Enhanced Due Diligence templates. This documentation framework, initially introduced in 2023, forms the basis of auditable and verifiable responsible procurement practices.
 - In 2025, Windiam acknowledges that the full implementation of certain requirements—particularly those related to the Supplier Code of Conduct—is still in progress (see also KPI 3 under Cluster 1). This lag does not indicate gaps in fundamental sourcing controls, but rather reflects the time required to achieve consistent alignment across a diverse and international supplier base.
 - Windiam continues to exclude suppliers linked to CAHRAs or sanctioned entities and remains committed to progressively strengthening documentation completeness, supplier engagement, and compliance monitoring. KPIs related to responsible procurement are aligned with those presented in the “Instilling Trust” chapter, ensuring coherence across governance, sourcing, and human rights objectives.



MAIN TOPIC 2: COMMUNITY ENGAGEMENT

Windiam is committed to long-term, values-driven community engagement, focusing on trusted initiatives that deliver concrete social impact. In a context of increasing social fragmentation, the company prioritizes support for communities where solidarity, care, and resilience are essential. Windiam's approach is based on continuity, proximity, and the conviction that meaningful engagement requires sustained commitment rather than one-off actions. In 2025, the total financial contribution allocated to these initiatives amounted to EUR 52,000, reflecting Windiam's continued and structured commitment to community solidarity, care, and dignity.

SUPPORT TO THE JEWISH COMMUNITY

- A significant part of Windiam's community engagement is dedicated to supporting initiatives within the Jewish community, primarily in Antwerp and Israel. These actions reflect the company's historical roots, its geographic anchoring, and its belief in the importance of safeguarding strong, resilient communities.
- Among the supported organizations, **Tikvatenoe** provides specialized care and inclusion pathways for children and adults with intellectual disabilities, enabling them to remain active participants in everyday life. **Chabad Lubavitch Antwerp** focuses on youth development through educational, cultural, and sports programs that strengthen social cohesion and future opportunities. Windiam also supports **Assure for the Children**, an organization dedicated to building a secure future for Israeli children orphaned following major humanitarian tragedies.

Health and emergency care are addressed through **Hatzoloh Antwerp**, a volunteer-based emergency medical service ensuring rapid response and life-saving care, and **Chai Lifeline**, a Europe-wide support network assisting families facing serious illness, crisis, and loss through medical, practical, and psychological support.

SUPPORT TO COMMUNITIES IN AFRICA

- Windiam has maintained its long-standing partnership with **Action in Focus**, an NGO active in Kenya focused on education, rural infrastructure, and medical care. This engagement, ongoing for more than a decade, reflects Windiam's belief in targeted, long-term development initiatives with measurable impact.
- Windiam has actively supported the organization and its founders for many years. In 2023 alone, the company helped 150 Kenyan children complete primary school through a dedicated funding program.
- In 2025, Windiam continued to support a **dozen pupils** in their secondary education, contributing to improved access to education and future opportunities. This project complements the company's broader community engagement by addressing educational inequality in a region particularly exposed to economic and climatic challenges.



*“Thank you for believing in me and investing
in my education.”*

ESTER AKINI, STUDENT SUPPORTED BY WINDIAM



CLUSTER 3.

FOSTERING EQUAL OPPORTUNITIES

OUR COMMITMENT:

Windiam is committed to providing equal employment opportunities to all individuals, irrespective of age, gender, sexual orientation, pregnancy, religion, nationality, ethnic origin, disability, medical background, skin colour, or marital and parental status. Employment decisions are consistently based on merit, skills, role requirements, and business needs. Our people are our most valuable asset. This conviction was clearly demonstrated in 2025, when—despite unprecedented market challenges such as price erosion, margin pressure, and intensified competition—the Board chose not to downsize the workforce. This decision reflects long-term confidence in both the future of the diamond industry and Windiam’s role within it.

“A company built to last is one where experience, diversity, and new perspectives coexist. Inclusion is what allows knowledge to circulate and values to endure. As Windiam expands across geographies and cultures, inclusion becomes a shared language that connects our teams and strengthens our identity.”

YIGAL ABEND, CHIEF FINANCIAL OFFICER



Cluster 3: Fostering equal opportunities

MAIN TOPIC 1: THE PEOPLE AT WINDIAM

The high level of expertise, international reach, and operational efficiency required across Windiam's polished and rough diamond activities relies on a highly skilled and engaged workforce. The founders continue to consider the team as the cornerstone of the company's performance and resilience. With a core team of 21 employees in Antwerp, Windiam remains a recognised employer in the diamond sector, valued for its stability, diversity, and inclusive work environment.

CULTURAL DIVERSITY

- The diamond industry has long been shaped by its international character, and this is particularly evident in Antwerp, whose port history has fostered a uniquely **cosmopolitan environment**. Within the Antwerp diamond district, more than a dozen communities coexist, each contributing distinct cultural, religious, and social traditions.
- Windiam fully reflects—and actively embraces—this diversity. Its team brings together **seven different nationalities**, enriching the organisation with a wide range of perspectives and experiences. The presence of team members from varied cultural backgrounds, including a Tibetan Customer Support representative, illustrates Windiam's openness and inclusive ethos.
- Respect, equality, and open dialogue are embedded in Windiam's corporate culture. A strict **non-discrimination policy** ensures that merit remains the primary criterion for recruitment, development, and promotion, supported by clear internal policies designed to foster a fair and supportive working environment.

CONTINUOUS IMPROVEMENT

- At Windiam, continuous improvement is a shared mindset. Every team member is encouraged to strive for excellence while maintaining uncompromising quality standards. In an environment built on trust and collaboration, performance and personal fulfilment go hand in hand. The Windiam team works with intensity, resilience, and mutual support—qualities that contribute to both professional satisfaction and collective success.

STAFF SENIORITY AND RETENTION

- Windiam's positive working climate, shaped by the founders' long-term vision, translates into exceptional employee loyalty. Long careers of 15 years or more are not uncommon, a rare characteristic within the diamond industry

- ▼ **Employees with 10+ Years of Service: ~50%** of the workforce
- ▼ **Employees with 20+ Years of Service: 30%** of the workforce

These figures reflect a strong sense of belonging, stability, and shared commitment—key foundations for sustaining skills, knowledge transmission, & long-term performance.

WORKFORCE COMPOSITION

- ▼ **Experienced Professionals:** Long-tenured employees providing mentorship
- ▼ **Younger Staff:** Bringing energy and innovation

WORK ENVIRONMENT IMPACT



MAIN TOPIC 2: PROMOTE GENDER EQUITY

Windiam is committed to promoting gender equity both within its own workforce and across its broader value chain. While maintaining gender balance internally remains a priority, a key challenge lies in extending these principles beyond the company's direct operations.

GENDER BALANCE INTERNALLY

- Windiam continues to promote a balanced and inclusive workplace. Women represent **43%** of the global workforce, a level of gender representation that remains exceptional within the diamond industry.
- Women hold several **key positions** within the organisation, including management and operational roles such as Quality Control Officer and Administration Officer. These appointments reflect Windiam's commitment to equal access to responsibility and career development.
- In 2025, only one employee departure slightly shifted the gender balance in favour of men, without altering the company's long-standing commitment to gender equality.
- With the launch of Windiam MFG, Windiam's exclusive manufacturing partnership in India, the company's overall gender balance now reflects the current realities of the local diamond manufacturing ecosystem, where production roles remain predominantly male. As of 2025, Windiam MFG employs approximately 295 people, including 35 women and 260 men. While women currently represent a minority within the manufacturing workforce, it is important to note that several female employees hold senior and supervisory roles. Improving gender diversity within the manufacturing environment has been identified as a clear priority for 2026. Planned actions include targeted recruitment efforts, skills development initiatives, and the progressive implementation of working conditions designed to encourage greater female participation over time.



PROMOTING GENDER EQUITY IN THE INDUSTRY

Since 2024, Windiam reinforced its external approach by aligning its gender equity ambitions with the **Women's Empowerment Principles (WEPs)**, as promoted by the Watch & Jewellery Initiative 2030. Rather than treating gender equity as a standalone policy, Windiam has chosen to embed selected WEP objectives into its Supplier Code of Conduct, making gender-related expectations an integral part of supplier engagement and due diligence.

WOMEN'S EMPOWERMENT PRINCIPLES

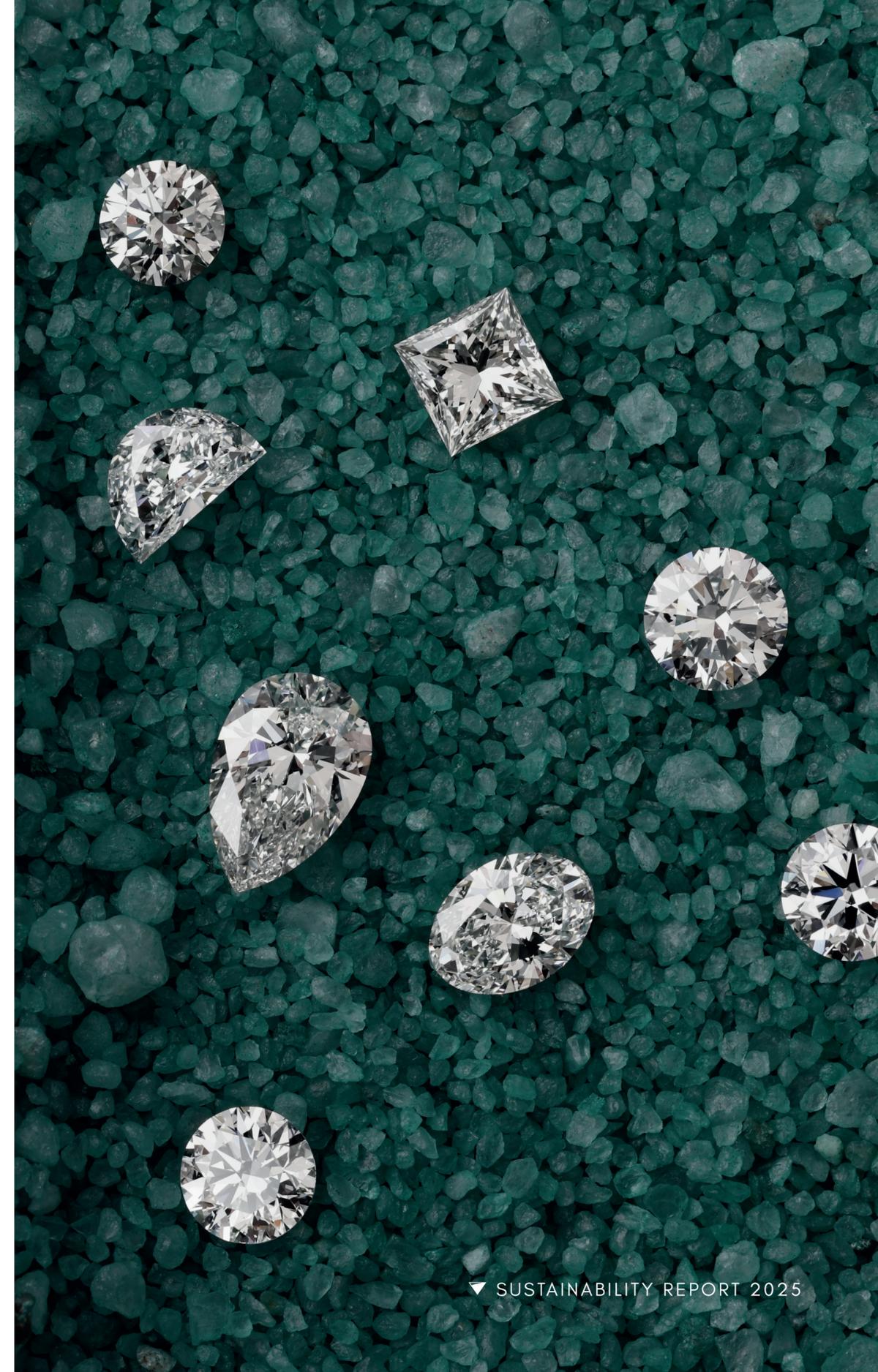
Cluster 3

MAIN TOPIC 3: FOSTER INCLUSIVENESS & EQUALITY IN THE SUPPLY CHAIN

Our Commitment:

As a mid-stream player in the diamond value chain, Windiam recognises that its ability to promote inclusiveness and equality lies primarily in the quality of its supplier relationships. In 2025, the focus shifted from intention to structural integration, using governance tools to embed social expectations into everyday business practices.

- A key milestone this year was the formal integration of inclusivity and equality clauses into **Windiam's Supplier Code of Conduct** (see also KPI 3 - Cluster 1). This step establishes a clear, shared framework through which Windiam communicates its expectations to suppliers, particularly within manufacturing environments where social progress remains uneven across the sector.
- By embedding these principles into contractual and operational requirements, Windiam strengthens awareness, accountability, and dialogue with its partners, laying the foundation for more inclusive and equitable practices across the supply chain over time.





CLUSTER 4.

CONTRIBUTING TO LIFE

OUR COMMITMENT:

Windiam is committed to minimizing its environmental impact, recognizing the need to combat climate change and reduce its carbon footprint. Contributing to life means recognising that responsibility does not stop at what we directly emit. Even with a limited footprint, Windiam chooses to act—by reducing what it controls and influencing what it does not.

“At Windiam, we understand that our environmental responsibility extends beyond our direct operations. Even for Scope 3 emissions, we share the responsibility and work to inspire positive change throughout our entire supply chain.”

PHILIPPE VANDENBROECKE, SUSTAINABILITY MANAGER



Cluster 4: Contribution to life

MAIN TOPIC 1: CLIMATE CHANGE

Carbon Assessment

- In 2025, Windiam updated its greenhouse gas (GHG) emissions assessment across Scopes 1, 2, and 3. The assessment estimates Windiam’s direct emissions (Scopes 1 and 2) at 26.18 tCO₂e, reflecting the limited footprint of its office-based operations, with no manufacturing activities included in the reporting perimeter for the year. Scope 3 emissions, which represent the vast majority of Windiam’s climate impact, were estimated at 79.2 ktCO₂e. As in previous years, Scope 3 emissions account for more than 99% of total emissions, confirming that Windiam’s climate impact is primarily embedded within its supply chain.
- The year-on-year increase in Scope 3 emissions is entirely attributable to a significant **rise in trading volumes**, driven mainly by the expansion of Windiam’s rough diamond business and a strategic focus on small goods in 2025. As Windiam sources exclusively from smaller mining operations, which do not publish carbon footprint data, supplier-specific emissions data was not available. In the absence of primary data, Windiam applied industry-average emission factors derived from a peer-reviewed study published by Imperial College London (2021) to ensure methodological consistency and transparency.

- While Scope 3 emissions are not directly generated by Windiam, the company considers them part of its shared responsibility as an industry actor. Influence, transparency, and collaboration across the value chain remain Windiam’s primary levers for action. The company’s climate strategy therefore focuses on improving emissions in categories where it has direct control—such as packaging—and on engaging with upstream partners to encourage greater climate awareness and data availability.
- Windiam is committed to aligning with the Science Based Target Initiative (SBTi), in line with the Paris Agreement’s goal to limit global warming to 1.5°C, aiming for net-zero emissions by 2050. Windiam’s overall impact is minor but will adopt a dual strategy to reduce emissions where possible and encourage improvements across its supply chain.

GHG EMISSION ASSESSMENT RESULT

	2024	2024	2025
SCOPE 1 & 2	12tCO ₂	0.8tCO ₂ e	26,18tCO ₂ e
SCOPE 3	35.4ktCO ₂ e	2.4ktCO ₂ e	79,2ktCO ₂ e
TOTAL	35.4ktCO ₂ e	2.4ktCO ₂ e	26,18ktCO ₂ e

KPI 1: ESTABLISHING THE CORRECT BASELINE (SBTI)

- The Greenly 2024 study served as an initial step for estimating Windiam's CO2 emissions. In 2025, Windiam launched a comprehensive SBTi study for its future CSRD obligations, based on 2025 data, to establish a baseline and set future emission reduction targets.

KPI 2: ADDRESSING SCOPE 3 EMISSIONS

- While Windiam's direct influence on large-scale mining operations remains structurally limited, the company acknowledges its responsibility to contribute to climate mitigation beyond its immediate operational perimeter. In 2025, Windiam continued to focus its efforts on understanding, quantifying, and addressing **Scope 3 emissions**, with the objective of identifying meaningful levers for action.
- As part of its effort, Windiam is conducting an initial assessment of its **top 10 suppliers** regarding carbon emissions management and climate action plans. This analysis identifies three suppliers with clearly defined climate strategies, including several frontrunners within the Indian diamond manufacturing ecosystem. While this assessment does not capture the full picture of indirect emissions—particularly where suppliers themselves source from entities with published ESG or net-zero commitments—it indicates that the effective share of Windiam's intake linked to climate-conscious actors is likely higher than what can currently be formally quantified.

KPI 3: MAINTAIN RENEWABLE ENERGY EFFORTS.

- In 2025, Windiam reaffirms its ambition to strengthen the use of renewable energy across its operations. At the Antwerp site, the installation of rooftop solar panels remains under consideration and is subject to the formal approval of the building's co-owners. This decision-making process is expected to take place in 2026, after which implementation can be evaluated.
- While Windiam's existing activities continue to have a limited direct energy footprint, the launch of Windiam MFG in India introduces a new operational context in which energy sourcing becomes a material topic. Consequently, the transition toward renewable energy has been defined as a forward-looking objective for the manufacturing facility. Windiam is currently assessing available options, including electricity sourced from renewable providers and the technical feasibility of rooftop solar installations.
- This KPI will gain increasing relevance as production volumes ramp up. Quantitative targets and performance indicators will be defined once energy consumption data is sufficiently consolidated, enabling Windiam to integrate renewable energy into its broader climate strategy in a robust and data-driven manner.

TARGET FIGURES (2025-2027)



MAIN TOPIC 2: WASTE REDUCTION

At Windiam, we are dedicated to minimizing our environmental footprint by actively reducing packaging waste and enhancing recyclability throughout our operations. We continuously seek eco-friendly alternatives for packaging materials, prioritizing recyclable, biodegradable, and sustainably sourced options. By optimizing our supply chain and collaborating with responsible partners, we aim to eliminate unnecessary waste, improve material efficiency, and support a circular economy.

KPI 1: DEMONSTRATE COMMITMENT TO CONTINUOUS IMPACT ON SCOPE 1 & 2

- In 2024, Windiam introduced biodegradable bags and began organizing recalls for all our Loose Diamond Display Cases. Customers are now encouraged to return these cases twice a year for reuse, significantly extending their lifecycle and reducing waste.
- In 2025, Windiam's in-house climate team, composed of employees from across operations, continues to drive impactful solutions. This team evaluates every aspect of Windiam's operations to identify areas for reducing emissions and waste. One notable initiative was the replacement of fossil-based LCA grip-bags with bio-based alternatives, achieving a 75% reduction in CO₂ emissions. Despite higher initial costs, these bio-based bags were adopted for all sales and shipping departments.
- Looking forward, Windiam remains committed to exploring additional sustainable initiatives. The ongoing efforts not only set a benchmark for Windiam's future actions but also aim to inspire other companies to adopt similar environmentally responsible practices.

Impact Category /1000 pieces	Bio-Based Grip Bag	50% Recycled Grip Bag	Conventional PE Grip Bag
Land Use (m ² .yr crop)	32,1	3,2	3,1
Global Warming Potential (kg CO ₂ eq)	6,4	20,0	26,7
Water Usage (m ³)	4,3	0,3	0,4
Material Circularity (n)	0,2	0,3	0,2
Fossil Fuel Scarcity (kg oil eq)	6,8	6,8	12,6

MAIN TOPIC 3: BIODIVERSITY

- As a member of the Watch & Jewellery Initiative 2030 (WJI 2030), Windiam has committed to establishing a comprehensive roadmap for nature conservation that aligns with its ambitions and capabilities. While the initial commitment to address the biodiversity crisis remains intact, the company acknowledges that the development and implementation of this roadmap have been slower than anticipated due to a very demanding agenda in 2025.
- It is important to note that the progression of Windiam's biodiversity initiatives has been impacted by the broader strategic priorities and the intensive focus on other critical projects. This pause allows Windiam to approach biodiversity with greater realism, clearer priorities, and stronger alignment with its operational and supply-chain realities from 2026 onwards.



CLUSTER *5.*

ECONOMIC RELEVANCE

OUR COMMITMENT:

Windiam is committed to building a resilient and responsible business model that aligns long-term economic performance with high ESG standards. Our approach to sustainability is not separate from our business strategy; it is a core driver of value creation, risk management, and competitiveness in a rapidly evolving diamond industry. In 2025, the integration of manufacturing into Windiam's business model through the opening of its own workshop in India represents a strategic evolution. It strengthens economic resilience by improving operational control, efficiency, and reliability, while simultaneously increasing accountability for social, environmental, and governance impacts. By bringing production closer to our organization, Windiam reinforces transparency, traceability, and responsibility across the value chain.

Cluster 5: Economic relevance

MAIN TOPIC 1: JOURNEY TO THE MOST SUSTAINABLE BUSINESS MODEL

Windiam's journey toward a more sustainable business model is based on continuous improvement, progressive integration, and measurable impact. Historically focused on responsible sourcing, the company is now extending its responsibility deeper into the value chain through direct manufacturing.

The integration of manufacturing enables Windiam to move from indirect influence to direct responsibility, reinforcing both ESG performance and long-term business resilience. This journey includes:

- Upholding the highest ethical, social, and environmental standards throughout sourcing and manufacturing
- Strengthening traceability and data reliability, enabled by closer operational oversight

MAIN TOPIC 2: STRIKING THE BALANCE

The diamond industry is facing an unprecedented recession, with structural disruptions affecting demand, margins, and financing across the value chain. In this context, sustainability must be built on a foundation of economic viability.

As a significant economic player in the diamond sector, Windiam carries a responsibility toward its employees, partners, and stakeholders. Maintaining financial stability is essential to sustain long-term ESG commitments.

Key principles guiding this balance include:

- Recognising that strong financial performance is a prerequisite for credible and lasting sustainability efforts
- Acknowledging the rising structural costs of sustainability, including regulatory compliance, audits, specialised expertise, internal resources, and reporting requirements
- Understanding that comparable standards and policies are applied by its strategic business partners, ensuring that responsibility is shared across the value chain.
- Strategically integrating upcoming obligations such as SBTi alignment and CSRD compliance into long-term business planning

The decision to invest in an exclusive manufacturing partnership model reflects this balance. By improving operational efficiency, predictability, and quality control, the workshop strengthens Windiam's economic foundations while enabling deeper ESG engagement.

Cluster 5

POLICY & PROCEDURES FRAMEWORK

General Requirements	Legal Compliance	Fair Competition	Sustainability/RJC Policy	Reporting Policy
Responsible Supply Chains, Human Rights & Due Diligence	Human Rights	Responsible Sourcing	Bribery & Facilitation Policy	Anti Money Laundering & Combatting of Terrorisms
	Security Policy	Provenance Claim Policy		
Labour Rights & Working conditions	General Employment Policy	Working Hours Policy	Remuneration Policy	Harassment, Discipline & Grievance
	Non Retailiation	Child & Forced Labour	Non-Discrimination	Freedom of Association & Collective Bargaining
Health, Safety & Environment	Health & Safety Policy	Environmental Policy	Hazardous Substances	Wastes & Emissions
Product Related Standards	Product Disclosure	Kimberley Process Certification Scheme	World Diamond Council System of Warranties	

Resources

List of Acronyms

- **CAHRAs** – Conflict-Affected and High-Risk Areas
- **COP** – Code of Practices (RJC)
- **CSRD** – Corporate Sustainability Reporting Directive
- **ESG** – Environmental, Social, and Governance
- **EU** – European Union
- **GHG** – Greenhouse Gas
- **GRI** – Global Reporting Initiative
- **HRD** – Hoge Raad voor Diamant (Diamond High Council)
- **IGI** – International Gemological Institute
- **ISO** – International Organization for Standardization
- **KPI** – Key Performance Indicator
- **KYC** – Know Your Customer
- **LCA** – Life Cycle Assessment
- **NGO** – Non-Governmental Organization
- **OECD** – Organisation for Economic Co-operation and Development
- **RJC** – Responsible Jewellery Council
- **SBTi** – Science-Based Targets initiative
- **SCDD** – Supply Chain Due Diligence
- **SDGs** – Sustainable Development Goals
- **SoW** – System of Warranties (World Diamond Council)
- **UBO** – Ultimate Beneficial Owner
- **UN** – United Nations
- **WEPs** – Women’s Empowerment Principles
- **WJI** – Watch & Jewellery Initiative
- **WTAP** – Windiam Traceability Assurance Platform

A new chapter for Accountability

Reporting Scope:

The WINDIAM group of companies is composed of:

- WINDIAM NV (Belgium)
- WINDIAM JEWELLERY BV
- WINDIAM PARIS SAS (France)
- WINDIAM ISRAEL LTD
- WINDIAM ITALY SRL

Reporting Principles:

This report refers to the Global Reporting Initiative (GRI : Foundation 2021) Standard, and follows the Guidelines, Required Disclosures and Material Topics as laid down respectively in the GRI 1, GRI2 and GRU 3 Universal Standards. Where necessary, reference is made to relevant Topic Standards. In time; we may adopt reporting principles as laid down either by legal initiatives (like the Corporate Sustainability Reporting Directive_CSRD).

Reporting Period:

This report covers the period from July 1st 2024 to June 30th 2025.

Reporting Methodology:

Prepared with external ESG expertise

Subject to independent audits and continuous improvement

For further information, remarks and suggestions on this report, please contact us at **ESG@Windiam.com**



Windiam's 2025 Sustainability Report reflects the evolution of our ESG approach—from intent to action. As sustainability becomes increasingly embedded in our operations, governance, & manufacturing activities, we continue to advance transparency, accountability, & long-term impact across the diamond value chain.

Contact: esg@windiam.com

