

Human Rights Policy

1. PURPOSE:

The purpose of this policy is to ensure that the WINDIAM group demonstrates its commitments to internationally accepted human rights standards in its employment practices. We are committed to provide an environment in which every employee is treated fairly, respected, has the opportunity to contribute to business goals and also to realize their full potential as individuals.

2. POLICY:

The WINDIAM group works to ensure that fundamental human rights and the dignity of the individual are respected at all times. We therefore comply with and respect all internationally recognized international rights such as the United Nations Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights.

We subscribe to the following Human Right principles (non-exhaustive selection):

- Employees have the right to have their dignity respected and protected;
- Working conditions and practices will not infringe on the inherent dignity of employees;
- Physical, sexual, racial, religious, psychological, verbal or any other form of harassment, threat or abuse, whether manifested in behaviors, language or gesture is strongly condemned and will not be tolerated;
- Corporal punishment, mental or physical coercion or verbal abuse will not be tolerated, encouraged or supported;
- Employees have the right to make political choices and to exercise these rights outside of working hours;
- Employees and employers will be free to form associations for the protection of their interests and to bargain collectively but will not be compelled to do so.

3. SYSTEMS AND PROCEDURES

- A yearly Human Rights Due Diligence Risk Assessment will be performed to ensure adherence to Human Rights principles.
- The HR Due Diligence will be completed by a continuous Supply Chain Due Diligence.

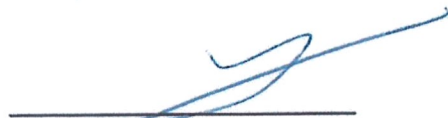
4. RESPONSIBILITY FOR THE POLICY:

The Director. Appropriate training will be foreseen for each member of staff, either at induction or at regular intervals. Employees are encouraged to report any breach of policy via the Grievance and Complaints procedures and or directly to the Director.

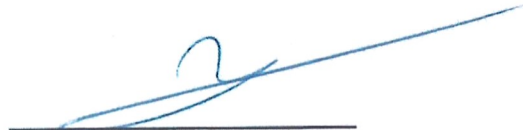
5. REPORTING REQUIREMENTS:

Breaches of this policy will be reported to the Director and will be part of the yearly reporting on Human Rights Issues. This policy must be read in conjunction with our Supply Chain Policy.

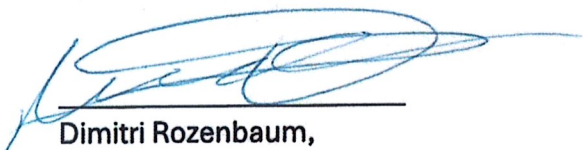
Antwerp, September 24th, 2025



Gon Raz,
Executive Director, Windiam N.V.



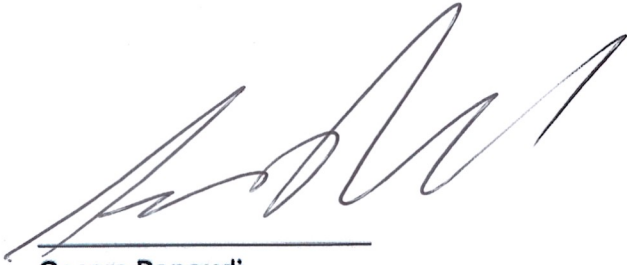
Gon Raz,
Executive Director, Windiam Jewelry B.V.



Dimitri Rozenbaum,
Director T2A Diamonds B.V.



Thomas Colombin
Director Windiam – Paris SAS



Cesare Renaudi
Director Windiam Italy Group Srl