



S.E. Barbi Diamonds Ltd

RESPONSIBLE SOURCING POLICY

Introduction

S.E. Barbi Diamonds Ltd ("S.E. Barbi" or "we" or "our") is committed to ethical business practices. This means that we conduct business lawfully, appropriately, and with honesty and integrity by adhering to applicable laws and regulations and exercising sound judgment.

We are a certified member of the Responsible Jewelry Council ("RJC") and comply with the Kimberley Process governing the purchase of rough.

As a member of the RJC, we are independently audited against the Responsible Jewelry Code of Practices. The S.E. Barbi's Code of Conduct sets out our ethical commitment, standards of behavior. We expect that our business partners including suppliers, share this commitment, and we are committed to working with our suppliers to ensuring high social, environmental, and business ethics standards.

This Responsible Sourcing Policy ("the Sourcing Policy" or "RSP") sets out the principles and standards that S.E. Barbi applies when selecting and working with its suppliers. It details our approach to managing social, environmental, and business ethics impacts and risks in our supply chain including how we address violations of the Suppliers' commitment.

We will continuously improve our understanding of our supply chain and the traceability of our product by mapping our supply chains and undertaking due diligence.

Suppliers must ensure that this policy is also observed by sub-suppliers.



THE FUNDAMENTAL PRINCIPLES

Every aspect of this policy is focused on achieving and upholding the Fundamental Principles, which are both the foundation and vision to realise our responsible business ambitions. As we work with suppliers who share and commit to these Principles, within their own business and across their extended supply chain, we will be able to effect change. The Principles are not a our 'creation'. They are anchored in internationally recognised standards. We endorse the UN Guiding Principles on Business and Human Rights and are embedding them throughout our operations. In line with the Fundamental Principles, we base our Human Rights commitment on the International Bill of Human Rights consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights; and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. We support the OECD Guidelines for Multinational Enterprises and resulting commitments to compliance with applicable laws, and to fighting corruption in all its forms.

THE FUNDAMENTAL PRINCIPLES ARE:

1. Business is conducted lawfully and with integrity
2. Work is conducted on the basis of freely agreed and documented terms of employment
3. All workers are treated equally and with respect and dignity
4. Work is conducted on a voluntary basis
5. All workers are of an appropriate age
6. All workers are paid fair wages
7. Working hours for all workers are reasonable
8. All workers are free to exercise their right to form and/or join trade unions or to refrain from doing so and to bargain collectively
9. All workers' health and safety are protected at work
10. All workers have access to fair procedures and remedies
11. Land rights of communities, including indigenous peoples, will be protected and promoted
12. Business is conducted in a manner that embraces sustainability and reduces environmental impact



MANDATORY REQUIREMENTS FOR DOING BUSINESS WITH S.E. BARBI

In this section, we describe the Mandatory Requirements relevant to each of the Fundamental Principles which our suppliers must achieve to establish and maintain a business relationship with S.E. Barbi. We require all suppliers who work with or for S.E. Barbi to respect and comply with these Mandatory Requirements.

1. Business is conducted lawfully and with integrity

Compliance with Laws

All laws and regulations are complied with in the countries in which the supplier operates. All other applicable international laws and regulations are complied with including those relating to international trade (such as those relating to sanctions, export controls and reporting obligations).

Kimberley Process

Implementation of the Kimberley Process Certification Scheme and the World Diamond Council voluntary system of warranties whose purpose is to avoid contribution to conflict diamond trade, and will support similar future initiatives aiming to protect human rights and the integrity of our supply chain.

Our purpose is to identify the product origin/source under our risk assessment

Anti-bribery and corruption

There is a prohibition on any and all forms of bribery, corruption, extortion or embezzlement and there are adequate procedures in place to prevent bribery in all commercial dealings undertaken by the supplier.

Anti-money Laundering and terrorist financing

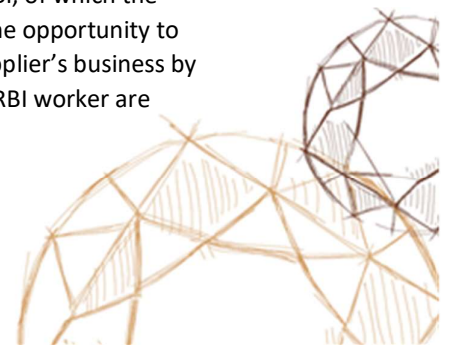
All business and commercial dealings are transparently performed and accurately recorded in the supplier's books and records. There is no actual or attempted participation in money laundering.

Gifts and Hospitality

Any business entertaining or hospitality with S.E. BARBI is kept reasonable in nature, entirely for the purpose of maintaining good business relations and not intended to influence in any way S.E. BARBI's decisions about how S.E. BARBI awards future business. Gift giving should occur sparingly and always be legitimate and aligned with company policies.

Conflicts of Interest

All and any conflict of interest in any business dealings with S.E. BARBI, of which the supplier is aware, will be declared to S.E. BARBI to allow S.E. BARBI the opportunity to take appropriate action. Any ownership or beneficial interest in a supplier's business by a government official, representative of a political party, or a S.E. BARBI worker are



declared to S.E. BARBI prior to any business relationship with S.E. BARBI being entered into.

Confidential Information

S.E. BARBI's confidential information must not be shared with any third party unless expressly permitted by S.E. BARBI.

Reporting Concerns and Non-retaliation

All workers (whether directly employed or not) are provided with means by which to raise their concerns about any of these requirements and processes are in place to ensure that workers who raise concerns and speak up in good faith are protected from retaliation.

2. Work is conducted on the basis of freely agreed and documented terms of employment

All workers, both permanent and casual, are provided with employment documents that are freely agreed upon and which respect their legal and contractual rights.

3. All workers are treated equally and with respect and dignity

All workers are treated with respect and dignity. No worker is subject to any physical, sexual, psychological or verbal harassment, abuse or another form of intimidation. There is no discrimination in employment, including hiring, compensation, advancement, discipline, termination or retirement. Discrimination based on race, ethnicity, age, role, gender, gender identity, color, religion, country of origin, sexual orientation, marital status, pregnancy, dependants, disability, social class, union membership, or political views is prevented. In particular, attention is paid to the rights of workers most vulnerable to discrimination.

4. Work is conducted on a voluntary basis

Under no circumstances will a supplier use forced labour, whether in the form of compulsory or trafficked labour, indentured labour, bonded labour or other forms. Mental and physical coercion, slavery and human trafficking are prohibited.

5. All workers are of an appropriate age (child labour)

Under no circumstances will a supplier employ individuals under the age of 15 or under the local legal minimum age for work or mandatory schooling, whichever is higher. When young workers are employed they must not do work that is mentally, physically, socially or morally dangerous or harmful or interferes with their The rights of workers to freedom of association and collective bargaining are recognised and respected. Workers are not intimidated or harassed in the exercise of their right to join or refrain from joining any organisation. schooling by depriving them of the opportunity to attend school.

6. All workers are paid fair wages

All workers are provided with a total compensation package that includes wages, employer's operations. overtime pay, benefits and paid leave which meets or exceeds



the legal minimum standards or appropriate prevailing industry standards, whichever is higher, and compensation terms established by legally binding collective bargaining agreements are implemented and adhered to.

7. Working hours for all workers are reasonable

Workers are not required to work more than the regular and overtime hours allowed by the law of the country where the workers are employed.

8. All workers are free to exercise their right to form and/or join trade unions or to refrain from doing so and to bargain collectively

The rights of workers to freedom of association and collective bargaining are recognized and respected. Workers are not intimidated or harassed in the exercise of their right to join or refrain from joining any organization.

9. All workers' health and safety are protected at work

A healthy and safe workplace is provided to prevent accidents and injury arising out of, linked with, or occurring in the course of work or as a result of the employer's operations.

10. All workers have access to fair procedures and remedies

All workers are provided with transparent, fair and confidential procedures that result in the swift, unbiased and fair resolution of difficulties which may arise as part of their working relationship.

11. Land rights of communities, including indigenous peoples, will be protected and promoted

The rights and title to property and land of the individual, indigenous people and local communities are respected. All negotiations with regard to their property or land, including the use of and transfers of it, adhere to the principles of free, prior and informed consent, contract transparency and disclosure.

12. Business is conducted in a manner that embraces sustainability and reduces environmental impact

Operations, sourcing, manufacture, distribution and the supply of products and services are conducted with the aim of protecting and preserving the environment.

DUE DILIGENCE AND RISK ASSESSMENT

The due diligence is performed in alignment with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-affected and High-risk areas





Reporting on Breaches

Any failure to comply with this Policy of which the supplier is aware should be reported to S.E. Barbi as soon as possible. Failure to do so will be a breach of this RSP.

We strongly support a culture of speaking up for both suppliers and their workers without fear of retaliation against those who report actual or suspected breaches

Suppliers, their employees, workers or contractors may report actual or suspected breaches of this RSP to S.E. Barbi by phone or email. Reports can be submitted confidentially and anonymously (where permitted by law).

S.E. Barbi will investigate any concern raised and discuss findings with the supplier. The supplier shall assist with any such investigation and provide access to any information reasonably requested.

If remediation is required, the supplier will devise and inform S.E. Barbi of their corrective action and implementation plans and timeline to effectively and promptly resolve the breach.

