



581 5th Ave. Suite 560, NEW YORK, N.Y. 10017 • (212) 319-3300

Supply Chain Policy

- 1) Antwerp Diamond Distributors is a wholesaler of loose polished diamonds based in New York, NY. This policy confirms Antwerp Diamond Distributors' commitment to respect human rights, avoid contributing to the finance of conflict and comply with all relevant UN sanctions, resolutions and laws.
- 2) Antwerp Diamond Distributors is a certified member of the Responsible Jewellery Council (RJC). As such, we commit to following policies relating to the RJC OECD (Organization for Economic Co-operation and Development) Guidance and a commitment to identify and assess risks related to conflict affected and high-risk areas (CAHRA's). The areas of concern are:
 - A)
 - a) respect human rights according to the Universal Declaration of Human Rights and International Labour Organization Declaration on Fundamental Principles and Rights at Work;
 - b) do not engage in or tolerate bribery, corruption, money laundering or finance of terrorism;
 - c) support transparency of government payments and rights-compatible security forces in the extractives industry;
 - d) do not provide direct or indirect support to illegal armed groups;
 - e) enable stakeholders to voice concerns about the jewelry supply chain; and
 - f) are implementing the OECD five-step framework as a management process for risk-based due diligence for responsible supply chains of minerals from conflict-affected and high-risk areas (CAHRA's).
 - B) Regarding serious abuses associated with the extraction, transport or trade of minerals: We will neither tolerate nor profit from, contribute to, assist or facilitate the commission of:
 - a) torture, cruel, inhuman and degrading treatment;
 - b) forced or compulsory labor;
 - c) the worst forms of child labor;
 - d) human rights violations and abuses; or
 - e) war crimes, violations of international humanitarian law, crimes against humanity or genocide.
- 3) We also commit to using our influence to prevent abuses by others by informing our suppliers and stakeholders of our policies through e-mailings and online vehicles. Antwerp Diamond Distributors requires KYC forms from vendors and customers to prove legitimization in the diamond industry, as well as an acknowledgement letter that partnering companies will follow the points of interest of the RJC. Complaint mechanisms are in place through contacting our office and online. Companies that have proven to be blatant non-compliant with RJC policies will be removed from vendor/customer list until proof of correction can be shown. Companies that are suspected of abuses will be given up to 6 months to correct abuses and we will offer our guidance to correct the abuse. If after this time period said company has not changed its practices, we will stop working with said company. If it is suspected (internally or externally) that any of our upstream suppliers are sourcing materials from any Conflict-Affected and High-Risk Areas (CAHRA's), they shall immediately alert the Highest-ranking Company Officer available. Their alert shall remain anonymous and will be investigated by upper Management. Each potential alert will be handled individually and will be thoroughly reviewed. Due diligence will be used to confirm or dismiss the alert presented to Antwerp Diamond Distributors. Whether the alert is deemed to be in violation will be based on the discretion of Antwerp Diamond Distributors, the outlined guidelines in this document and in addition to all guidelines set forth by RJC. If there are any questions or complaints, please contact Phyllis Lisker at mail@antwerpdistributors.com or call (212) 319-3300.
- 4) Whereas Antwerp Diamond Distributors requires the OECD due diligence from our suppliers, we in turn expect our suppliers to conduct their own OECD due diligence from their suppliers.
- 5) Regarding direct or indirect support to non-state armed groups: 1) We only buy or sell diamonds that are fully compliant with the Kimberley Process Certification Scheme and System of Warranties and 2) will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring minerals from, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates who illegally:
 - a) control mine sites, transportation routes, points where minerals are traded and upstream actors in the supply chain; or
 - b) tax or extort money, or minerals at mine sites, along transportation routes or at points where minerals are traded, or from intermediaries, export companies or international traders.

- 6) It is the policy of Antwerp Diamond Distributors and its suppliers to be fully compliant with the Kimberley Process Certification Scheme and the World Diamond Council System of Warranties (SoW). All diamond invoices are to be compliant with the WDC SoW, stating “The diamonds herein invoiced have been {sourced} purchased from legitimate sources not involved in the funding of conflict, in compliance with United Nations Resolutions and corresponding national laws {where the invoice is generated}. The seller hereby guarantees that these diamonds are conflict free and confirms adherence to the WDC SoW Guidelines.”
- 7) Where national law prevents the SoW statement from being included in your invoice, you should include it in separate accompanying documents.
- 8) We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are sourcing from, or are linked to, any party providing direct or indirect support to non-state armed groups as described in paragraph 2 or 5.
- 9) Regarding public or private security forces: We affirm that the role of public or private security forces is to provide security to workers, facilities, equipment and property in accordance with the rule of law, including law that guarantees human rights. We will not provide direct or indirect support to public or private security forces that commit abuses described in paragraph 2B or that act illegally as described in paragraph 5.
- 10) Regarding bribery and fraudulent misrepresentation of the origin of minerals, we will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of minerals or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of minerals.
- 11) Regarding money laundering: We will support and contribute to efforts to eliminate money laundering where we identify a reasonable risk resulting from, or connected to, the extraction, trade, handling, transport or export of minerals.
- 12) Regarding material nature of diamonds: It is the policy of Antwerp Diamond Distributors to only deal with “earth grown” natural diamonds and gemstones; no Lab Grown or simulants. Any “unnatural” diamonds or gemstones found to have been purchased will be returned to supplier for a full refund.
- 13) As part of its core business, the following minerals are used by the company: Loose Polished Diamonds.
- 14) Members of the supply chain shall respect third-party intellectual property rights and abide by licensing agreements, wherever applicable.
- 15) We hereby guarantee our diamonds have not originated from the Mbada and Marange regions of Zimbabwe.
- 16) All minerals used in the manufacturing of jewelry for Antwerp Diamond Distributors are responsibly sourced and conflict free.
- 17) All suppliers and customers must complete a Know Your Counterparty (KYC) document that contains basic background information, including: company contact information, owners/directors and beneficial partners. KYC’s must be included for all partner companies. Suppliers must also complete the “Supplier Compliance Packet” that includes acknowledgement of above principles for Human Rights, sourcing of goods and accepted trade practices.
- 18) KYC information will be fact checked against government databases including OFAC Sanctions List, World Bank Listing of Ineligible Firms & Individuals and United Nations Security Council. We will not work with any company that has been sanctioned by these government organizations.
- 19) Adherence to U.S. Department of Treasury’s Office of Foreign Assets Control (OFAC) Sanctions against Russia for Diamonds, Gemstones and Precious Metals, based on Personal Knowledge and/or Written Guarantees.
- 20) Jewelry materials that are sold to Antwerp Diamond Distributors are to be compliant with the State of California lead and cadmium policies (See: Article 10.1.1 Chapter 6.5, Division 20, of the California Health and Safety Code (Sections 25214.1-25214.4.2)).

Policies are updated through government notices and trade notifications including:

www.responsiblejewellery.com, www.kimberleyprocess.com, www.worlddiamondcouncil.org, www.un.org
www.awdc.be, www.gold.org, www.lbma.org.uk, www.agta.org

This policy is reviewed yearly and will be modified per updates to RJC protocols or due to a change in sourcing practices.

Phyllis Lisker is the manager of the Supply Chain Policy.

Phyllis Lisker
President
July 31, 2025

To file a grievance against Antwerp Diamond Distributors, please email mail@antwerpdistributors.com.
Antwerp Diamond Distributors ensures that the person / company filing this grievance shall do so without fear of
blowback, retaliation, dismissal or harassment. The grievance filed shall remain confidential.



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July 31, 2025

Annual statement to company stakeholders

In Mid-2025, Antwerp Diamond Distributors will undergo a re-certification audit as a certified member of the RJC (Responsible Jewellery Council) based on the COP 2024. The COP 2024 audit includes due diligence of our Supply Chain Policy including policies regarding OECD's (Organisation for Economic Co-operation and Risk Development) and CAHRA's (Conflict-Affected and High-Risk Areas). The policies and procedures the company follows include:

- Anti Bribery & Facilitation payments
- Anti Money Laundering and Finance of Terrorism
- Adherence to the Kimberley Process and World Diamond Council System of Warranties
- Supply Chain Policy-OECD-CAHRAs
- Diamonds to be purchased from responsible and legitimate sources
- Company policy with regards to synthetic diamonds
- Security of People and Products
- Sexual Harassment Policy
- Product Integrity Practices
- Human Rights
- Health & Safety Performance
- Community Relations
- Environmental Performance
- Relationship with Business Partners
- Statement of commitment to RJC policies and procedures
- Commitment to employee policies manual

This statement has been posted online.

Antwerp Diamond Distributors is committed to the safety and human rights of our employees and have trained our staff on proper workplace behavior and complaint mechanisms. By informing our business partners of our RJC requirements, we are committed to educating the jewelry industry in proper workplace practices and procedures throughout the supply chain.

Policies and procedures are available at www.antwerpdistributors.com and upon request.

Phyllis Lisker
President, Director of Operations



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Anti-Bribery Policy

Bribery means giving or offering (as well as demanding or receiving) any undue advantage to (or from):

- a public or government official (politically exposed persons);
- a political candidate, party or official; or
- any private sector employees, directors or officers, or their agents or representatives.

Corruption is any unlawful or improper behaviour that seeks to gain a private advantage through illegitimate means. Any kind of bribery is a form of corruption; but corruption also includes abuse of power, extortion, fraud, deception, collusion, cartels, embezzlement and money laundering. Employees include both directly employed workers that have contracts with the RJC member and indirectly employed workers that regularly work at members' sites and that have employment contracts with a third party, such as a labor agent, labor provider or contractor/subcontractor.

Facilitation payments are sums of money paid to get preferential treatment for something the receiver is otherwise still required to do—for example, paying an official to speed up, or 'facilitate', an authorisation process.

This policy confirms Antwerp Diamond Distributors' commitment to prohibit bribery and corruption in all business practices and transactions

Antwerp Diamond Distributors commits to protect our employees from any penalty or adverse consequences for identifying in good faith concerns related to suspected bribery, refusing to participate in bribery or refusing to pay a facilitation payment where facilitation payments are prohibited, even if this action may result in the loss of business.

If an employee wishes to raise a suspicion of bribery, they may do so through the company grievance mechanism.

If an employee is found to have paid or accepted a bribe, they will be disciplined per the decision of the principals of the company.

Below we set out our criteria and approval procedures for employees to follow when offering and/or accepting gifts to or from third parties:

- Employees can accept and give gifts on behalf of the company of up to and including the value of \$150.00 per the discretion of Dov Lisker, Director of Operations
- Employees should register all such gifts by contacting Dov Lisker, Director of Operations.

Antwerp Diamond Distributors does not allow political donations to be made on behalf of the company

Antwerp Diamond Distributors may make charitable contributions. These will always be done adhering to this policy document.

Dov Lisker is responsible for this anti-bribery and corruption policy and implementation of our related system.

Phyllis Lisker
President
June 5, 2025



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-POLICY-
California's "Lead-Containing Jewelry Law"
Compliant

Antwerp Diamond Distributors, Inc. does not intentionally add lead or cadmium to any of our products. Incoming materials and production melts are carefully checked for lead and cadmium content. Products you purchase from Antwerp Diamond Distributors, Inc. do not contain a level of lead or cadmium that would prohibit the product from being sold or offered for sale pursuant to Article 10.1.1 Chapter 6.5, Division 20, of the California Health and Safety Code (Sections 25214.1-25214.4.2).



Antwerp

Diamond Distributors, Inc.

581 5th Ave. Suite 560, NEW YORK, N.Y. 10017 • (212) 319-3300

Employee Grievance Report

Employee Name	
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Date of the Grievance	
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Description of the grievance:

Were there any witnesses?

How would you like this matter to be resolved?

Date

Employee Signature

Date

Supervisor Signature

Reported to		on	
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Antwerp Diamond Distributors ensures that the person / company filing this grievance shall do so without fear of blowback, retaliation, dismissal or harassment. The grievance filed shall remain confidential.

Send complaint to: Phyllis Lisker, mail@antwerpdistributors.com or hand deliver.



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Employee Grievance Procedure

Antwerp Diamond Distributors is a wholesaler of loose polished diamonds. This policy confirms Antwerp Diamond Distributors' commitment to prohibit harassment and violence in all forms in the workplace. This includes outside the physical location of the workplace to include business trips, social events and all forms of communication. Antwerp Diamond Distributors commits to respect the Human Rights of our employees and those we may affect directly or indirectly through our business activities.

Antwerp Diamond Distributors has established a grievance mechanism for employees to raise grievances with the company. We prohibit retaliation against any employee who raises a grievance using this mechanism.

Employees can and should raise a grievance if:

- raising it informally has not dealt with the issue satisfactorily
- it's a very serious issue.

Mrs. Phyllis Lisker is responsible for implementing and reviewing this procedure.

Concerns can be raised by interested parties via email or telephone to:

Phyllis Lisker

Tel: 212-319-3300

Email: mail@antwerpdistributors.com

On receiving a grievance, we aim:

- To process the grievance in a timely manner
- To assess the eligibility/scope of the grievance and, where applicable, decide who should handle it internally
- where the issue can be handled internally, seek further information where possible and appropriate;
- Senior management will review complaint and consult (via web or attorney) how to implement corrective actions
- To obtain information about the grievance, such as where it occurred (location), the period over which the grievance occurred, and whether the complainant has any supporting information, such as emails, video, pictures, witnesses or witness statements
- To find out if the complainant would like to request anonymously
- find out how the complainant would like it handled;
- In cases where we are unable to address the grievance internally (e.g. where our company is too far removed from the origin of the issue raised in the complaint), we may redirect it externally, such as an industry body
- To identify any actions, we should take including hearing from all parties concerned, and monitor the situation
- To advise the complainant of our decisions or outcomes, confidentially if appropriate
- To protect the complainant's anonymity and protect them from possible retaliation for complaints brought in good faith
- If corrective actions are required, they will be implemented in policies and procedures
- To keep records on complaints received and the internal process followed, for at least five years.

Antwerp Diamond Distributors ensures that the person filing this grievance shall do so without fear of blowback, retaliation, dismissal or harassment. The grievance can be filed anonymously by company employees via anonymous email or phone accounts. The grievance filed shall remain confidential.

Grievance procedures shall be reviewed with company employees annually as part of the employee policies annual review.

This grievance procedure has been approved by senior management and is included in the employee handbook, is available online and is posted in the office.

Phyllis Lisker

President

July 31, 2025

*Examples of workplace harassment and abuse; all are considered unacceptable behaviours:

- Verbal abuse or use of foul language
- Shouting, with the intent to demean, bully or intimidate
- Making threats of any kind
- Pushing, pulling, hitting or shoving
- Pulling hair
- Slapping, pinching, pricking with pins
- Abusive name-calling
- ‘Staring’ or standing too close to the opposite sex
- Inappropriately touching hands, arms or hair
- A man intentionally brushing up next to a woman in a queue
- Making inappropriate comments about a woman’s or man’s appearance, body or sexual habits
- Asking for sexual favours in return for something (for example, overtime or job security)
- Forced kissing or fondling
- Coercive sex (rape)
- Using sexually explicit language
- Displaying sexually explicit pictures on the wall
- Sending abusive or sexual messages, photographs or images by phone, email or social media.



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Environmental Office Policy Statement

At Antwerp Diamond Distributors, we are committed to operating in an environmentally responsible and sustainable manner. We recognize that our activities have an impact on the environment and are dedicated to minimizing this impact through continuous improvement of our environmental practices.

Our Commitments:

1. **Compliance:**

We will comply with all applicable environmental legislation, regulations, and other requirements relevant to our operations.

2. **Pollution Prevention:**

We aim to reduce pollution and minimize waste by promoting responsible resource use, including energy, water, paper, and other office materials.

3. **Sustainable Practices:**

We will integrate sustainability into our everyday business activities by encouraging recycling, reducing single-use items, and choosing environmentally friendly products and services wherever possible.

4. **Energy Efficiency:**

We will monitor and strive to reduce our energy consumption by promoting energy-efficient technologies and behaviors among staff.

5. **Awareness and Training:**

We will educate and train our employees on environmental issues relevant to our operations and promote environmental awareness across all levels of the organization.

6. **Continuous Improvement:**

We will regularly review our environmental performance and seek opportunities for improvement, innovation, and sustainable development.

This policy is communicated to all employees and made available to stakeholders. It is reviewed annually to ensure its relevance and effectiveness.

Phyllis Lisker
President
July 31, 2025



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Health and Safety Office Policy Statement

Effective Date: July 31, 2025

Introduction

At Antwerp Diamond Distributors, the health, safety, and well-being of our employees, contractors, and visitors are our top priority. We are committed to providing a work environment that meets or exceeds all applicable federal, state, and local safety regulations, including those set by the Occupational Safety and Health Administration (OSHA) and the New York State Department of Labor (NYSDEL).

Objective

The purpose of this Health and Safety Policy is to establish clear principles and procedures to prevent accidents, injuries, and illnesses in the workplace. Our goal is to foster a proactive safety culture where every employee contributes to maintaining a safe working environment.

Responsibility

- **Management** is responsible for providing the necessary resources, training, and support to ensure that safety standards are met.
- **Supervisors** are responsible for ensuring that health and safety policies are followed in their areas of responsibility and for reporting any unsafe working conditions immediately.
- **Employees** are required to follow all health and safety guidelines, promptly report hazards, and actively participate in training and safety programs.
- **Safety Officer/Coordinator** is responsible for overseeing the implementation and enforcement of safety policies and procedures.

Policy Commitment

1. **Compliance with Laws and Regulations:** Antwerp Diamond Distributors will comply with all federal, state, and local regulations, including but not limited to OSHA standards, the New York State Labor Law, and any other safety-related regulations.
2. **Risk Assessments:** We will conduct regular risk assessments of our workplace to identify hazards and implement preventive measures.
3. **Training:** We will provide regular safety training to all employees to ensure they are aware of potential risks, know how to respond in an emergency, and are equipped with the skills to work safely.
4. **Accident Reporting:** Employees are encouraged to immediately report any accidents, injuries, or near misses. An investigation will follow to determine the cause and implement corrective actions.
5. **Workplace Inspections:** Routine safety inspections will be conducted to identify hazards, and corrective actions will be taken to mitigate risks.
6. **Personal Protective Equipment (PPE):** PPE will be provided as needed and employees will be trained in its proper use and maintenance.
7. **Emergency Preparedness:** We will establish and regularly review emergency evacuation plans and ensure that employees are trained in emergency procedures.
8. **Posting of policies:** Workplace safety policies, federal and local laws will be posted in the office and/or employee handbook

Employee Involvement

We believe that safety is everyone's responsibility. Antwerp Diamond Distributors encourages employee participation (without fear of blowback) through safety recommendations, meetings, and feedback to continuously improve the health and safety culture of the company.

Conclusion

This Health and Safety Office Policy Statement reflects our dedication to providing a safe and healthy work environment. We believe that safety is an ongoing process that requires the active participation of everyone at Antwerp Diamond Distributors

Phyllis Lisker has been assigned to implement, manage and review the Health and Safety protocols of Antwerp Diamond Distributors.

This policy will be reviewed periodically to ensure its effectiveness and compliance with applicable laws.

Phyllis Lisker
President
Antwerp Diamond Distributors
July 31, 2025



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Human Rights Policy

We, at Antwerp Diamond Distributors, recognize our responsibility to respect human rights. We believe that our business has a role to play in protecting and promoting human rights.

Antwerp Diamond Distributors is committed to respect internationally recognized human rights throughout our operations and supply chains. In line with the UN Guiding Principles on Business and Human Rights, our Policy is based upon the international standards enshrined in the Universal Declaration of Human Rights and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

Human rights refer to a set of basic rights and freedoms that belong to every person in the world, regardless of where they are from, what they believe or how they choose to live their life. It is a broad concept, with economic, social, cultural, political and civil dimensions. For Antwerp Diamond Distributors, respecting human rights means ensuring that any person involved in, or coming into contact with, our operations, supply chains and products is treated with dignity, respect, fairness and equality.

Our Policy sets out overarching principles for how we conduct business at Antwerp Diamond Distributors. Together with our employees and business partners, we are committed to drive forward the implementation of this Policy throughout our operations and supply chains. We recognize unique challenges to these standards may arise and we will work to address these challenges in partnership with relevant partners and stakeholders.

1. Employment is freely chosen
2. Freedom of association
3. Working conditions are safe and hygienic
4. Child labor shall not be used
5. Living wages are paid
6. Working hours are not excessive
7. No discrimination is practiced
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed

Antwerp Diamond Distributors will continuously work to embed this Policy throughout the relevant processes and procedures of the company to ensure its effective implementation.

We recognize that we must take steps to identify and address any actual or potential adverse impacts, whether they are directly or indirectly linked to our business activities or relationships. We understand that human rights due diligence is a dynamic, on-going process which requires acting on the findings, tracking our actions, and communicating to our stakeholders how we address impacts.

As our human rights risks and impacts may vary over time, this policy will be subject to review if proven inadequate by our human rights due diligence process.

Dov Lisker is responsible for this Human Rights policy and implementation of our Human Rights due diligence process, grievance mechanism and reporting on Human Rights.

Phyllis Lisker
President
April 25, 2025



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Kimberley Process & System of Warranties Background, Regulations & Processes

Definition and applicability

The Kimberley Process is a joint government, international diamond industry and civil society initiative to stem the flow of conflict diamonds. Conflict diamonds is a term for rough diamonds that are used by rebel movements to finance wars against legitimate governments. (Source: <http://www.kimberleyprocess.com/>)

Background

The issue of conflict diamonds began gaining public prominence in the late 1990s. Human rights nongovernmental organizations (NGOs) drew attention to the illegal trade in rough diamonds. This trade was funding rebel movements in Angola and Sierra Leone and indirectly contributing to human rights atrocities. The diamond industry was brought into the media and consumer spotlight.

In response, the diamond and jewellery industry, through its designated representative organization the World Diamond Council (WDC), began working with the United Nations, key governments and NGOs to seek a solution. These meetings became known as the Kimberley Process. The outcome was the Kimberley Process Certification Scheme (KPCS) which aims to prevent conflict diamonds from entering the supply chain. The system is implemented by governments and tracks the export and import of shipments of legitimate rough diamonds between participating countries. To support it, the WDC also created a voluntary program of industry self-regulation called the System of Warranties (SoW) which extends to the trade in cut and polished stones.

The diamond industry has made a strong commitment to the Kimberley Process and the effectiveness of the KPCS and the WDC SoW is being closely monitored by NGOs. This includes both the performance of governments and that of the diamond industry. Exposure of ineffective systems or complicity in the sale of conflict diamonds poses a significant risk to the reputation of individual companies and for the industry as a whole. For companies, failure to abide by KPCS or the WDC SoW exposes the Member to expulsion from industry organizations and loss in trade.

At an industry level, if self-regulation is seen to be ineffective, the pressure for stronger regulatory action will grow.

Regulations

The Kimberley Process Certification Scheme (KPCS)

The Kimberley Process Certification Scheme came into effect in 2003. The KPCS requires participating nations to keep conflict diamonds out of legitimate channels of commerce. All imports and exports of rough diamonds must be via a government office. This office verifies the source, packs diamond consignments to be transported in tamper-resistant containers and issues the accompanying government-validated Kimberley Process Certificate.

Each forgery-resistant certificate must be uniquely numbered and include data describing the shipment's contents and the country of origin. Government signatories to the Kimberley Process are required to implement internal controls on the movement of diamonds and can only export/import diamonds to/from other countries that are part of the KPCS.

The World Diamond Council System of Warranties (SoW)

To provide industry support for the KPCS and additional assurance to end-consumers, the World Diamond Council (WDC) created a voluntary program of self-regulation, the System of Warranties (SoW). It requires that all consignments of diamonds, whether rough, polished, or set in jewellery, be accompanied by a written warranty on all invoices through the supply chain. This applies each time the diamonds change hands and extends down to retail jewelers (but not to end-consumers). The official WDC warranty statement reads:

"The diamonds herein invoiced have been {sourced}* purchased from legitimate sources* not involved in funding conflict, in compliance with United Nations Resolutions and corresponding national laws {where the invoice is generated}**. The seller hereby guarantees that these diamonds are conflict free and confirms adherence to the WDC SoW Guidelines."

*{sourced} - may be used by companies that do not purchase from open market, but source and aggregate diamonds from production facilities that are owned/partly owned by them

**{where the invoice is generated} - may be used by companies if they specifically want to reference the country of invoice issuance

Records must be kept of the warranty invoices received and issued, which must be auditable and reconciled on an annual basis. If asked for by a duly authorized government agency, these records must be able to prove compliance with the Kimberley Process for rough diamonds.

Industry Principles of Self-Regulation

In addition to KP and SoW adherence, all diamond and jewellery industry organizations and their Members have adopted the following principles of self-regulation, obliging them to:

- 1) Trade only with companies that include warranty declarations on their invoices;
- 2) Not buy diamonds from suspect sources or unknown suppliers, or which originate in countries that have not implemented the Kimberley Process Certification Scheme;
- 3) Not buy diamonds from any sources that, after a legally binding due process system, have been found to have violated government regulations restricting the trade in conflict diamonds;
- 4) Not buy diamonds in or from any region that is subject to an advisory by a governmental authority indicating that conflict diamonds are coming from or available for sale in such region, unless diamonds have been exported from such region in compliance with the Kimberley Process Certification Scheme;
- 5) Not knowingly buy, sell or assist others to buy or sell conflict diamonds;
- 6) Ensure that all company personnel that buy or sell diamonds are well informed regarding trade resolutions and government regulations restricting the trade in conflict diamonds.

Antwerp Diamond Distributors' management approach to the Kimberley Process

Phyllis Lisker has been identified as the representative of Antwerp Diamond Distributors to manage and implement the KPCS and SoW program.

Thus, all rough and polished diamond purchases must meet regulations as outlined above as part of the Industry Principles of Self-Regulation.

April 28, 2025



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Annual Reporting

Company Name:	Antwerp Diamond Distributors
Date:	July 31, 2025
Reporting period:	2025
OECD Due Diligence Guidance	Action taken
Step 1: Establish strong company management systems	
1.A Adopt, and clearly communicate to suppliers and the public, a company policy for the supply chain of minerals originating from conflict-affected and high-risk areas.	Supply chain policy sent to all suppliers and customers, as well as posted on company website. Policy includes all regulations dealing with OECD's and CAHRA's.
1.B Structure internal management systems to support supply chain due diligence.	Phyllis Lisker manages the internal supply chain and makes final decisions if any issues have arisen.
1.C Establish a system of controls and transparency over the minerals supply chain.	All suppliers must complete a KYC and also list sourcing origins for product supplied to Antwerp Diamond Distributors. In addition, suppliers must complete Supplier conformance documents, following RJC guidelines, thereby supplier agrees to required sourcing protocols. Diamond invoices must contain System of Warranties.
1.D Strengthen company engagement with suppliers.	Supplier pamphlet recommends our suppliers continue up the supply chain to have their suppliers agree and establish similar protocols that we have established based on RJC. Our supply chain protocols include ability to work with any suppliers with infractions to adjust to our standards. RJC certification is on our emails and website, promoting the ideals of RJC.
1.E Establish a company-level, or industry wide, grievance mechanism as an early warning risk-awareness system.	Grievance mechanism has been established and is posted online and in the office.
Step 2: Identify and assess risk in the supply chain	
Identify and assess risks in the supply chain and assess risks of adverse impacts.	Risk reviews have been conducted on our supply chain relating to all aspects of the business model. No red flags have been identified this year. Precautions are in place to identify any Lab Grown Diamonds and prevent from mixing with Natural diamonds.
Step 3: Design and implement a strategy to respond to identified risks (if applicable)	
Report findings of the supply chain risk assessment to the designated senior management of the company.	Phyllis Lisker is responsible for dealing with any red flags in our risk assessments. No red flags identified.
Devise and adopt a risk management plan.	Risk protocols are documented to identify any red flags and what would happen if red flags are found.
Implement the risk management plan and monitor performance of risk mitigation efforts.	No red flags found at this time.
Internal training	Staff training was conducted on Supply chain procedures and establishing new suppliers.
Communications	Yearly report sent to stakeholders and posted online to update on policies and if any red flags have been identified that have not been corrected.
OPTIONAL INFORMATION ON Step 4: Carry out independent third-party audit	
RJC COP audit	Recertification scheduled for Mid-2025
Grievances and remediation	No grievances reported.



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OECD Supplier Information Yearly Report

Antwerp Diamond Distributors, Inc. has conducted a Supply Chain review per the OECD (**O**rganisation for **E**conomic **C**o-operation and **R**isk **D**evelopment) standards to meet due diligence guidelines for Responsible Supply Chains of Minerals from **C**onflict-**A**ffected and **H**igh **R**isk **A**reas (CAHRA's) for the year 2025.

Antwerp Diamond Distributors, Inc. has found its suppliers in Diamonds and minerals to be responsive in completing due diligence forms to satisfy risk-related issues relating to OECD. We have not found any red flags when dealing with our suppliers.

Review of Antwerp Diamond Distributors, Inc.'s completed due diligence was conducted and matched the internal investigation results.

For more information regarding the OECD results, please contact us at 212-319-3300 or mail@antwerpdistributors.com

Phyllis Lisker
President
July 31, 2025

Compliance with RJC COP 2024 Standards

Antwerp Diamond Distributors, Inc. has established policies and is compliant with the due diligence standards of the RJC COP 2024 relating to the below COP categories for the period of 2025:

- Anti Bribery & Facilitation payments
- Anti Money Laundering and Finance of Terrorism
- Adherence to the Kimberley Process and World Diamond Council System of Warranties
- Supply Chain Policy-OECD-CAHRA's
- Diamonds & Gemstones to be purchased from responsible and legitimate sources
- Company policy with regards to synthetic diamonds
- Security of People and Products
- Sexual Harassment Policy
- Product Integrity Practices
- Human Rights
- Health & Safety Performance
- Community Relations
- Environmental Performance
- Relationship with Business Partners
- Statement of commitment to RJC policies and procedures
- Commitment to employee policies manual

Antwerp Diamond Distributors, Inc. has completed and is compliant with its Human Rights Due Diligence annual review for the period of 2025 per the RJC COP 2024 standards.

Phyllis Lisker
President
July 31, 2025



581 5th Ave. Suite 560, NEW YORK, N.Y. 10017 • (212) 319-3300

Responsible Jewellery Council (RJC) Policy

Antwerp Diamond Distributors is a wholesaler of polished loose diamonds.

We have one location which is 581 Fifth Ave, Suite 560, New York, NY 10017.

Antwerp Diamond Distributors is a certified Member of the Responsible Jewellery Council (RJC).

The RJC is a standards-setting organization that has been established to advance responsible ethical, human rights, social and environmental practices throughout the diamond, colored gemstones, gold, silver and platinum group metals (PGM's) jewelry supply chain.

The RJC has developed a benchmark standard for the jewelry supply chain and credible mechanisms for verifying responsible business practices through third party auditing.

As a RJC Member we commit to operating our business in accordance with the RJC Code of Practices which is available at www.responsiblejewellery.com. We commit to integrating ethical, human rights, social and environmental considerations into our day-to-day operations, business planning activities and decision-making processes.

Specific policies relate to:

- Anti Bribery & Facilitation payments
- Anti Money Laundering and Finance of Terrorism
- Adherence to the Kimberley Process and World Diamond Council System of Warranties
- Supply Chain Policy-OECD-CAHRA's
- Diamonds to be purchased from responsible and legitimate sources
- Company policy with regards to synthetic diamonds
- Security of People and Products
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- Health & Safety Performance
- Community Relations
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- Statement of commitment to RJC policies and procedures
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Antwerp Diamond Distributors' RJC policy is available upon request for public viewing.

Phyllis Lisker

President

July 31, 2025



Antwerp

Diamond Distributors, Inc.

581 5th Ave. Suite 560, NEW YORK, N.Y. 10017 • (212) 319-3300

Supply Chain Complaint Form

Name of Company	
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Date of the Complaint	
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Description of Supply Chain complaint:

How has the complaint been resolved?

Comments:

Authorized Signature		Date	
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Antwerp Diamond Distributors ensures that the person / company filing this grievance shall do so without fear of blowback, retaliation, dismissal or harassment. The grievance filed shall remain confidential.

Send complaint to: Phyllis Lisker, mail@antwerpdistributors.com or hand deliver



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Supply Chain Grievance Procedure

Antwerp Diamond Distributors has established this employee grievance procedure to hear concerns about Corporate Human Rights violations, circumstances in its workplace, operations, statements, supply chain procedures or OECD supply chain involving diamonds and precious metals from conflict-affected and high-risk areas.

Mrs. Phyllis Lisker is responsible for implementing and reviewing this procedure.

Concerns can be raised by interested parties via fax, email or telephone to:

Phyllis Lisker

Tel: 212-319-3300

Email: mail@antwerpdistributors.com

On receiving a complaint, we will aim to:

- get an accurate report of the complaint;
- Senior management will review complaint and consult (via web or attorney) how to implement corrective actions;
- explain our complaints procedure;
- find out how the complainant would like it handled;
- decide who is the appropriate person internally to handle the complaint, or help redirect the complaint to another entity, such as the relevant supplier, or a relevant industry body;
- where the issue can be handled internally, seek further information where possible and appropriate;
- identify any actions we should take, or monitor the situation;
- If corrective actions are required, they will be implemented in policies and procedures;
- advise the complainant of any decisions or outcomes; and
- keep records on complaints received, and the internal process followed, for at least five years.

Antwerp Diamond Distributors ensures that the person / company filing this grievance shall do so without fear of blowback, retaliation, dismissal or harassment. The grievance filed shall remain confidential.

This grievance procedure has been approved by senior management and is available online.

Phyllis Lisker

President

January 28, 2025