

Supply Chain Due Diligence Reporting

Preamble:

PUSHPAM BV has aligned its Supply Chain Due Diligence communication and reporting on RJC's Guidance for this subject. As a result, this document recaps the reporting requirements for Tier 1 and downstream companies (the company's position in the diamond supply chain).

Reporting:

1. Management Systems:

PUSHPAM BV has created a Supply Chain Policy document which has been sent to all its suppliers. The Management responsibility for the due diligence programme has been assigned to the Company's Director, and adequate record-keeping systems and processes for information collection have been installed as per the Company's procedures for this subject.

2. Risk Assessment:

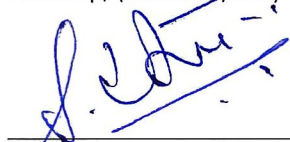
In preparation of its RJC Audit, PUSHPAM BV has engaged with all its suppliers by sending them its Supply Chain Policy and a Due Diligence Questionnaire, both accompanied by an explanatory letter on RJC's COP 7 and the Company's obligations in this respect. To date, the majority of suppliers have sent this questionnaire back, and the Company strives for 100% completion of supplier-response.

Response:

To date, no specific risks have been identified in our supply chain, as such, no specific extra steps needed to be undertaken by the Company to manage risks, monitor and track performance of risk mitigation or to follow up any specific risk-areas.

Note: The same remarks apply to PUSHPAM COLLECTON BV

Antwerp, (effective) May 15th 2026



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