

Policy on Bribery, Corrupt Practices and Facilitation Payments

Commitment:

Diacore stands against corruption. Diacore does not permit illegal, improper, corrupt, or unethical payments to be made in cash, property, or services by or on behalf of the Group in order to secure or retain business or other advantages. Diacore will comply with national, and where appropriate, international legislation and regulations with regards to Bribery, facilitation payments and gifts.

The compliance officer is committed to conducting due diligence on existing business relationships through our '*know your client*' ["**KYC**"] procedure.

Implementation:

Diacore are committed to: -

- Not offering or accepting any payments, gifts in kind, hospitality, expenses or promises that could compromise the principles of fair competition or constitute an attempt to gain or renew business for or with any person, or to influence the course of the business or governmental decision-making process,
- Providing means for workers to report bribery or facilitation payments without fear of retaliation,
- Identification of high-risk areas (including unusual or complex transactions) for bribery and Facilitation Payments and monitoring and/or investigation of allegations of attempted bribery or inappropriate gifts,
- Protecting workers 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 enterprise losing business.
- Ensuring that a thorough investigation will take place following any reports made to the compliance officer, and appropriate action will follow such investigations,
- Where necessary, hearings with an outside third party will take place to ensure the accused is given a fair hearing to determine guilt,
- Abiding by national legislation,
- Ensuring each entity complies with their local legislation,
- Where appropriate and relevant, abiding by the appropriate international guidelines, standards, declarations, and conventions as per the Best Practice Principles,
- Training all relevant managers and workers in the company policies and procedures,
- Setting the criteria and approval procedures in line with internationally recognized standards for workers to follow when offering and/or accepting gifts to or from third parties (where relevant).
- When dealing with high-risk individuals, politically exposed persons, or prominent influential persons, the company will conduct an enhanced due diligence and obtain any additional information to assist its investigation. In these instances, prior to conducting business we shall:
 - Obtain management approval prior to concluding any business relationship,

- Takes reasonable measures to establish to source of funds of the prospective customer; and
- Establish the occupation of the customer if this is not clear; and
- Should a business relationship be concluded, ensure ongoing monitoring of this relationship.
- we have the following information when undertaking in a wire transfer:
 - The originator's account number or unique transfer reference number (or any other identifying information),
 - The originators address and national identity number,
 - The name of the beneficiary,
 - The beneficiary's account number; and
 - The source and purpose of the funds.
- We will ensure that prior to engaging in the wire transfer, we have verified the originators' identity and keep this information on record.
- A whistle-blowing policy will be incorporated for workers or other Affected People or Groups to raise concerns.
- Diacore aims to eliminate all facilitation payments. If such facilitation payments are inevitable for whatever reason, we will publicly disclose such facilitation payments made to public or government officials.

Diacore's policy on bribery, corrupt practices and facilitation payments will be effectively communicated to all Workers.

Policy on Money Laundering, Terrorism Financing, and other Financial Offences:

Commitment:

Diacore is opposed to and does not engage in the condoning, facilitating, and supporting of illegal activities and/or money laundering and recognises that such practices are prohibited. Accordingly, Diacore will only conduct business with companies who, to the best of Diacore's knowledge, conduct business legally and whose funds come from lawful sources.

As such, Diacore will comply with national and, where appropriate, international legislation and regulations with respect to money laundering, terrorism financing, bribery, corruption, smuggling, embezzlement, fraud, racketeering, transfer pricing and tax evasion. In particular:

- UN Anti-Money Laundering Convention,
- FATF 40 + 9 Recommendations,
- OECD Guidelines for Multinational Enterprises,
- The US Patriot Act,
- The EC Directive 2001/97,
- UN Convention against corruption and against illicit traffic in narcotic drugs and psychotropic substances,
- The UAE Federal Law No. 4 of 2002 [for Diacore DMCC],
- The General Data Protection Regulations [GDPR.]

In addition, each individual entity within the Diacore Group will ensure that they comply with their own local legislation [and pay specific attention to restrictions on cash payments.] Furthermore, Diacore will act in accordance with national law with respect to the auditing of its financial accounts.

Implementation:

In order to ensure the practical achievement of our commitment, Diacore will use all reasonable endeavours to:

- Ensure anti-money laundering policies and procedures are adopted,
- It should be noted that although the Group does not engage in cash transactions, if these were to take place, we would ensure that they are within the limit prescribed by the specific jurisdiction,
- Maintain records of all single or apparently linked cash or cash-like transactions equal to or above 10,000 euros/US dollars or the threshold defined by the applicable law (whichever is lower). Where required by law (depending on each jurisdiction), the relevant Diacore entity shall report such transactions to the relevant designated authorities.
- Appoint a Financial Compliance Officer to monitor compliance who is a fit and proper person and has not been convicted of a criminal offence,
- Apply high standards in the selection, screening and acceptance of suppliers and purchasers of rough and polished Diamonds, including due diligence processes,
- Ensuring the "KYC" [know your client] procedure is followed, and all required documents are collected from potential purchasers and suppliers,

- During the vetting process we will check government issued identification and government listings for money laundering, fraud, involvement in prohibited organizations and/or financing conflict,
- Maintain records on the identification data through the client due diligence process, account file and business correspondence for a period of at least five years (or longer if required by law) following the termination of the business relationship,
- Protect the personal information provided to it through this due diligence process by ensuring compliance with the General Data Protection Regulations [GDPR],
- Report any suspicions of money laundering or terrorist financing and make sure reporting takes place to the relevant institutions/persons in each jurisdiction as required by legislation,
- Apply continued transaction monitoring,
- Implement appropriate worker training,
- Regular document review to ensure policies remain up to date,
- Appoint an auditor to independently audit the financial accounts of the company on an annual basis. The auditor must be:
 - Properly qualified to international accounting standards; and
 - Free of any bias and influence in his appointment.

Diacore's policy on money laundering, terrorism financing and other financial offences will be effectively communicated to management and to all Workers.