

RDI Diamonds, Inc. Human Rights Policy

COMMITMENT

At RDI Diamonds, Inc. we are committed to respecting the human rights as defined in the Universal Declaration of Human Rights; the International Covenant on Civil and Political Rights; the International Covenant on Economic, Social and Cultural Rights; and the ILO Declaration on Fundamental Principles and the Rights at Work.

This policy applies to RDI Diamonds, Inc. and our business partners, vendors, and suppliers.

We believe that the right not to be subjected to inhuman treatment, elimination of all forms of all forced or compulsory labor, effective abolition of child labor are fundamental human rights, and we are taking steps to improve our approach across our business. We believe that our business can help to promote human rights through our supply chain, but also acknowledge that without proper oversight, it can present risks to human rights as well.

APPROACH AND KEY IMPACT AREAS

Our approach to human rights begins with understanding how our activities, including our products and services, as well as the activities of our business partners, may impact, either positively or negatively, our rightsholders. These include rightsholders, employees, contractors, customers, supply chain workers, and the broader diamond community.

We strive to ensure that the rights of these rightsholders are respected and promoted through our activities and those of our business partners. We work to meet this commitment through the activities outlined below.

Supply Chain Partners: We believe in doing business with partners that share our values and commitments to respect human rights. While we strive to work only with partners that share our human rights commitments, sometimes this might not always be the case. To mitigate risks of human rights violations further down our supply chain, we will strengthen our ongoing partnerships, including a review of potential human rights considerations as part of that due diligence, and use our leverage when partner-related risks are identified.

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GOVERNANCE AND REMEDIATION

Human rights at RDI Diamonds, Inc. is part of our wider strategy and is implemented through a number of policies and procedures, including our Supply Chain Policy found on our website. We report on our progress against our targets and goals, including Human Rights, in our annual RJC report also found on the RJC section of our website.

Ultimate oversight of human rights at RDI Diamonds, Inc. falls with our Due Diligence Department. Operational oversight of human rights is managed by Sam Indelicato, Director of Jewelry, in addition to our partners across our business units.

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